MODEL HEARING CONSERVATION PROGRAM
TEMPLATE

THE PROBLEM: The most onerous part of the OSHA Occupational Noise Exposure standard (Sec. 1910.95) is the requirement that employers develop and implement a so called hearing conservation program. Such programs must provide for monitoring, audiometric testing, use of hearing protectors, training and recordkeeping, among other things.

HOW TOOL HELPS SOLVE THE PROBLEM: Every employer subject to the requirements must develop a hearing conservation program based on the sound hazards and conditions of their particular site, test results and operations. But here’s a basic Model Hearing Conservation Program that you can use as a template to organize your own Program—or measure if your current Program has all the elements OSHA requires.
I. PURPOSE

The purpose of this hearing conservation program is to prevent occupational hearing loss and ensure ABC Company complies with OSHA Standard CFR 1910.95, Occupational Noise Exposure.

[Insert statement indicating senior management’s recognition of occupational noise risks and commitment to take measures necessary to control the hazard and protect workers.]

Name____________________, Title____________________, is responsible for assuring implementation of Company policy concerning hearing conservation.

II. NOISE MONITORING

A. Noise Survey

1. Identify surveyor (e.g. company, insurance agency, government agency etc. by name):
   __________________________________________

2. Date of survey: ____________________________

3. Method of survey:
   __________________________________________
   __________________________________________
   __________________________________________
   __________________________________________
   __________________________________________

   ______ (brief description of how the noise was measured, e.g. dosimeter study, sound level meter measurements, brief description of any sampling strategy use e.g. type of sound measurement equipment used)

4. Results of survey: The following activities, locations, operations, etc. (as applicable) were found to equal or exceed 85dBA as an eight-hour average:
   __________________________________________
   __________________________________________
   __________________________________________
   __________________________________________

B. Monitoring

1. When information indicates any employee’s exposure may equal or exceed an eight-hour time weighted average of 85 decibels, a monitoring program will be implemented.

2. Where circumstances such as high worker mobility, significant variations in sound level, or a significant component of impulse noise make area monitoring generally inappropriate, representative sampling will be used to comply with the monitoring requirements of the standard unless sampling produces equivalent results.
3. All continuous, intermittent and impulse sound levels from 80 decibels to 130 decibels will be integrated into the noise measurements.

4. Instruments used to measure employee noise exposure will be calibrated to ensure measurement accuracy.

5. Monitoring will be repeated whenever a change in production, process, equipment or controls increases noise exposure to the extent that:

- Additional employees may be exposed at or above the action level; or

- The attenuation provided by the hearing protection devices being used by employees may be rendered inadequate to meet the requirements of paragraph (j) of the standard.

III. AUDIOMETRIC TESTS

A. Testing

1. Audiometric testing will be performed at no cost on all employees whose exposures equal or exceed an 8-hour time-weighted average TWA of 85 decibels (Action level).

2. Audiometric tests will be performed by:

   ________________________________
   ________________________________
   ________________________________
   (Specify a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations). A technician who operates microprocessor audiometers does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist or physician.
3. Audiograms will be conducted at least annually after obtaining the baseline audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels.

**B. Baseline Audiogram**

1. A baseline audiogram will be conducted within 6 months of an employee's first exposure at above the action level in order to establish a valid baseline audiogram against which subsequent audiograms can be compared.

2. *Include if a mobile test van is used.* Where a mobile test van is used to meet the audiometric testing obligation, the _________________(Position designated) will obtain a valid baseline audiogram will be obtained within 1 year of an employee's first exposure at or above the action level. Where baseline audiograms are obtained more than 6 months after the employee's first exposure at or above the action level, employees will wear hearing protectors for any period exceeding six months after first exposure until the baseline audiogram is obtained.

3. Testing to establish a baseline audiogram will be preceded by at least 14 hours without exposure to workplace noise. Hearing protectors may be used as a substitute for the requirement that baseline audiograms be preceded by 14 hours without exposure to workplace noise.

4. The _________________(Position designated) will notify employees of the need to avoid high levels of non-occupational noise exposure during the 14-hour period immediately preceding the audiometric examination.

**C. Records**

1. The _________________(Position designated) will maintain a record of all employee audiometric test records. This record will include:

   * Name and job classification of the employee.
   * Date of the audiogram.
   * The examiner's name.
   * Date of the last acoustic or exhaustive calibration of the audiometer.
   * Employee's most recent noise exposure assessment.

**IV. AUDIOMETRIC EVALUATION**

1. Annual audiograms will be compared to the baseline audiogram to determine if a standard threshold shift had occurred. Standard threshold shift is defined as a change in hearing threshold relative to the baseline threshold of an average of 10 dB of more at 2000Hz, 3000Hz, and 400Hz. The technician who is administering the audiometric test may do the comparison.
2. Comparison of an annual audiogram to an audiogram from the preceding year is not acceptable unless the audiogram of the preceding year is the baseline audiogram.  

(State the policy for evaluation of the audiograms. When selecting a vendor, determine how and who will provide the interpretation. Assure that the vendor understands that the annual audiograms must be compared to the baseline audiogram.)

3. Baseline audiograms may be revised if in the judgment of the audiologist, otolaryngologist or physician, the standard threshold shift is deemed to be persistent or if there is significant improvement in subsequent audiograms.)

4. Retesting may be done within thirty days after the annual audiogram to determine if the annual audiogram should be regarded as valid. If the follow up audiogram shows improvement, it may be used as the annual audiogram. (Interface with the vendor to determine how this might be accomplished and document policy for retesting here if it is to be considered an option. Consideration of another vendor may be necessary for such follow up testing if mobile testing services are used.)

5. Evaluation of problem audiograms will be done by a __________________ (Specify physician, audiologist, or otolaryngologist) to determine if there is a need for further evaluation. The evaluator will be provided with the following information:

* A copy of the hearing conservation amendments to the noise standard

* The baseline audiogram and the most recent audiograms of the affected employee

* Measurements of the background sound pressure levels in the audiometric testing room or chamber (which the vendor should be able to supply, and

* The record of audiometer calibration as prescribed in the noise standard, paragraph (h)(5).

6. Follow-up procedures. If there is a standard threshold shift, the employer has certain specific obligations.

a. In writing inform the affected employee of any standard threshold shift within 21 days of receipt of the results by __________________ (Indicate responsible party). The employee will also be informed of what will be done as a consequence (e.g. provide repeat testing within 30 days). A Standard Threshold Shift letter is an appropriate method of documenting this information to the employee. A copy of the STS letter will also be forwarded to the employee’s supervisor.
b. Unless the __________________ (Specify physician, audiologist or otolaryngologist) has made a
determination that the standard threshold shift is not work related, the following steps will be taken:

* Hearing protection will be provided for all affected employees not already using them;

* Employees will be fitted and trained in the care and use of the protective devices; and

* Protective devices are required to be used as a condition of employment.

* Refitting and retraining will be provided for all employees who are already wearing hearing
protection; hearing protection devices with greater attenuation will be provided.

* If additional testing is necessary or if there is reason to believe that there is a medical pathology
that is created or aggravated by the use of hearing protection devices, the employee will be referred
to ______________ (Specify physician, audiologist, or otolaryngologist) for a clinical audiological
evaluation.

* The employee will be informed of any need for further otological examinations that might result
from determination of a medical pathology that is not related to the use of hearing protection devices
by ______________(Specify procedure).

* Hearing loss will be entered on the OSHA 300 log if determined to be work related and as required
by 29 CFR 1904.0 – 1904.46.

* If subsequent audiometric testing of employees who have noise exposures that are less than 90
dBA as an eight hour weighted average are determined to have improved, the affected employees
will be informed of the new audiometric determination and may discontinue the use of required
hearing protection.

V. PERSONAL PROTECTIVE EQUIPMENT

1. Provision and use of hearing protection is required as a condition of employment for all employees who
work in areas or at operations in which their noise exposure exceeds 90 dBA as an eight hour
average.

2. Where use of PPE is required because of an exposure to noise in excess of 90 dBA as an eight
hour average, policy must include a disciplinary procedure that, at a minimum, provides for a
warning (re-training), intermediate discipline (e.g. suspension without pay), and finally dismissal for
any employee who consistently refuses to abide by the policy for using the required PPE.
3. PPE will be available on request for all employees who work in areas or at operations in which their noise exposure equals or exceeds 85 dBA as an eight hour average.

**Provision of PPE**

A choice of several types of hearing protective devices will be provided to allow employees to select the most comfortable hearing protection. It is recommended that at least two types of earplugs and one type of earmuff be made available. The OSHA Standard 1910.95 requires that a variety of hearing protection devices be made available.

a. Types of PPE provided: ______________________________________
   ______________________________________

b. Employees will obtain and replace PPE by contacting ______________________(Specify position).

c. Hearing protectors will be selected because they are capable of providing attenuation to at least _____ dBA. A choice of several types of hearing protection devices is provided to allow employees the most comfortable style or type. Employees are encouraged to try different types in order to determine their preference.

d. Hearing protection devices must provide sufficient attenuation to assure protection to at least 90 dBA.

e. If the employee has experienced a standard threshold shift (hearing loss), as defined in the noise standard, the hearing protection must be capable of providing sufficient attenuation to assure protection to at least 85 dBA.

f. Procedures for defining the appropriate attenuation rating are provided in Appendix B of the noise standard (1910.95).

g. The ______________________(Position designated) will evaluate the attenuation characteristics of the hearing protection devices to ensure that a given device will reduce the employee’s exposure to the required decibel level. (See Form #3)

**VI. EMPLOYEE EDUCATIONAL TRAINING**

A. An annual training program will be provided for all employees who are exposed to noise levels at or above an eight-hour average of 85 dBA.

B. Training will be conducted by ______________________(Position designated) and will include information on:

   1. The effects of noise on hearing.
   2. The purpose and use of hearing protectors.
3. The advantages and disadvantages of various types of protection.
4. Instruction in the selection, fitting, use and care of protectors.
5. The purpose of audiometric testing and an explanation of the test procedures.

C. The training program will be repeated annually of all employees exposed to noise at or above an eight hour average of 85 dBA.

D. The following information must be made available as a part of the training program:
   1. A copy of the OSHA Noise Standard 1910.95
   2. Any informational materials pertaining to the standard that are provided by OSHA
   3. Any materials related to the employer’s training and education program upon request to any representative of the Commissioner of the

VII. RECORDKEEPING

A. Audiometric testing records will be maintained ________________ (Position designated) and will be available for the duration of employment.

B. Noise exposure measurements will be maintained for two years.

C. The record of audiometric testing will include the following:
   1. The name and job classification of the employee
   2. The date of the audiogram
   3. The examiner’s name
   4. The date of the last acoustic or exhaustive calibration of the audiometer
   5. The employee’s most recent noise assessment
   6. An accurate record of the background measurements in the testing room or chamber