

Is this hearing loss recordable? How to interpret the New Recordkeeping Rule (in effect January 1st)

OSHA has always defined a Standard Threshold Shift as “an average change in hearing of 10 dB or more at the frequencies of 2000 Hz, 3000 Hz, and 4000 Hz” as compared to the employee’s baseline audiogram. This won’t change. Although follow-up was required for any employee with an STS of 10 dB or more, Federal requirements previously only required that shifts of 25 dB or more be recorded on the OSHA 300 Form. (Some states, including NC & SC, required STSs to be recorded at 10 dB or more.)

Beginning January 1, 2003, the recordability criteria will be determined in a two-step process: (1) A standard threshold shift of 10 dB or more, **and** (2) A 25 dB hearing level compared to audiometric zero.

So, the first thing you look at on your reports is the **Age Corrected Threshold Shift** line to determine if it is 10 or more in either ear. (See below, Step 1)

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INDIVIDUAL AUDIOGRAM

Employee: [REDACTED] SSN: [REDACTED] ID-Badge # [REDACTED]

Company/Plant: SHU [REDACTED]
 Department: FIN FINISHING
 Job: CLP CORE LOADER PACKER
 Location: 33 PLANT 33
 Birth Date: [REDACTED]
 Address: [REDACTED]

Date of Audiogram: 6/08/2002 Time: 3:28PM Audiometer Serial #: 11232
 Date of Baseline: 4/26/1984 Time: 12:00AM Calibration Date: 02/02

LEFT EAR										RIGHT EAR									
Freq	1k	.5k	1k	2k	3k	4k	6k	8k	Avg	Freq	1k	.5k	1k	2k	3k	4k	6k	8k	Avg
Ctrr	AAm	15m	10m	20m	35m	35m	45m	70m	30	Ctrr	15m	10m	15m	15m	30m	35m	45m	65m	27
Base	20	5	15	20	20	20	15	18		Base	15	15	5	15	20	45	30	13	
Shift	**	-5	5	5	15	15	25	55	12	Shift	**	-5	0	10	15	15	0	35	14

Age Corrected Threshold Shift LEFT: 8 RIGHT: 10

PBI Calculations: 0.0% (NO) (NO)

Examiner: 243 JEANNA CLARK

Noise Exposure: 0.0 Hours Since Exposure: [REDACTED]

NRR Recommended: 0 NRR Actually Used: 0

Protector Used: AIR AIRSOFT

Booth dB Levels
 800 (40) 1000 (40) 2000 (47) 4000 (57) 8000 (62)

Employee received feedback and training in the proper use and maintenance of the hearing protection device

Employee Confirmation: _____

Status/Comments: PERSISTENT THRESHOLD SHIFT Status Code 7

Results of audiometric testing for this employee indicate a PERSISTENT THRESHOLD SHIFT (PTS), which means that after retesting, results continue to demonstrate a threshold shift. This employee's baseline will be revised accordingly. The employee should be refitted with hearing protection and counseled as to its proper use on and off job. His/her hearing protectors should be evaluated for proper attenuation based on noise exposure in the workplace. These follow-up procedures should be documented. His/her name should remain on the OSHA 200 Form.

Step 2: Determine if the “average change in hearing from zero” is 25 dB or more.

Step 1: Determine if an STS has occurred (Average change in hearing of 10 dB or more at the frequencies of 2k, 3k, and 4k).

Note: With the new requirements, all states will be on the same playing field, so to speak. No state will be allowed to have requirements that are more strict than federal guidelines.

The result will likely be that states with current recordability criteria of 10 dB will have fewer recordables, and the states with current recordability criteria of 25 dB will have more recordables.

The additional criteria is referred to as a **25 dB shift from audiometric zero**. To determine this, look at the Current Test Average (See above, Step 2). If this number is 25 or more, then the STS is recordable. If it is less than 25, it is not recordable.

In a simplified summary:

- Step 1: Determine if the employee’s results indicate an STS as compared to the baseline. If NO, stop process. No recordability required. If YES, go to Step 2.
- Step 2: Determine if the employee’s results show a 25 dB average shift on current test. If NO, stop process. No recordability required. If YES, go to Step 3.
- Step 3: Determine whether the hearing loss is work-related. If NO, stop process. No recordability required. If YES, Record on OSHA 300 Form with 7 days.

We say “simplified summary” above only because there are other review criteria used for medical referrals, etc. that the audiologist considers.

In the sample test above, the STS would be recordable, because the average on the current test is greater than 25 db.

For more information, please call: Henderson & Associates, Inc. Mobile Healthcare Providers 888-696-4327