Hearing Conservation

Program Audit

Why conduct an audit of your program?

Almost any control program, even when carefully developed and implemented, can lose its effectiveness over time. Other priorities and programs compete for your resources which include people, time, money and materials. Periodically, it is important to conduct an audit of your Hearing Conservation Program to help ensure that key program elements are in place and operating so that the goal of hearing loss prevention is realized. Essentially, and audit consists of a review of your current program operation and compares what you have to what you should have.

How to conduct an audit of your program.

Use this audit checklist to review your Hearing Conservation Program as it currently operates, not as you think it should be operating or as it was originally intended to operate. Review the pertinent records (e.g., noise survey reports, audiometric test results, and training records) to help you determine the status of key program elements on the checklist. After completing the checklist, determine which program elements need improvement (i.e., where there are "No" answers) and complete the Hearing Conservation Program Audit Results found at the end of this booklet.

Hearing Conservation

Program Audit Checklist

The following questions, which include statutory requirements and other important program elements, are designed as a management assessment tool for assessing a Hearing Conservation Program. The following checklist should readily identify weakness or gaps in the program and point to the appropriate actions and solutions. [An asterisk (*) indicates an advisory program element.]

A. Noise Monitoring

		Yes	No
1.	Has your company performed noise measurements? If not, when and how do you obtain this information?		
2.	Was noise survey equipment calibrated before and after the survey?		
3.	Is your noise survey specific to each machine, each operator location, and each area?		
4.	Were noise levels from 80 dBA to 130 dBA included in the dose computation?		
5.	*Do you have a noise map (a facility, plant or building plan) with noise measurements marked on it?		
6.	Are employees, if exposed above 85 dBA-TWA, informed of the results of the survey?		
7.	Is monitoring repeated after changes in production, equipment, or controls increase noise exposure such that the number of overexposed employees increases or the attenuation of hearing protection may be rendered inadequate?		

B. Control Strategies

		Yes	No
1.	Has your company explored engineering solutions to noise control? If yes, explain:		
2.	Have administrative controls been addressed and documented by a noise exposure survey? If yes, explain:		
3.	Has the effectiveness of these controls been addressed and documented by a noise exposure survey?		

C. Written Policy

	Yes	No
1. *Is there a WRITTEN policy on hearing conservation?		
2. *If you have a written policy, does it include all the necessary elements, including disciplinary action, methodology, referral sources, etc.?		

D. Audiometric Testing Program

	Yes	No
1. Are all employees exposed to noise equal to or greater than 85 dBA-TWA included in the audiometric testing program?		
2. Does your company have baseline audiograms on all employees exposed to 85 dBA-TWA or greater?		
3. Are baseline audiograms performed as soon as possible at the time of employment or at least by the end of six months?		
4. Were baseline audiograms preceded by at least 14 hours without exposure to workplace noise or were the employees monitored closely to ensure that they were wearing hearing protection?		
5. Are employees informed of the need to avoid high levels of nonoccupational noise during the 14-hour quiet period?		
6. Are annual audiograms performed on all employees exposed to noise 85 dBA-TWA or greater?		
7. *Are exit audiograms performed prior to termination of employment for all employees in the audiometric testing program?		
8. Are annual audiogram results compared to the baseline hearing test?		
9. Does an audiologist, otologist or qualified physician review the results and make recommendations?		
10. Is the audiologist, otologist or physician provided with a copy of current regulations, the baseline hearing test, the most recent hearing test, and background noise measurements of the test room and a copy of the most recent audiometer calibration?		

	Yes	No
11. If a standard threshold shift was determined, do you:		
a. inform the employee in writing within 21 days?	_____	_____
b. refit and retrain the employee in the use of hearing protection?	_____	_____
c. require the employee to wear hearing protection (even if not previously required)?	_____	_____
d. refer the employee for an audiological or otological examination?	_____	_____
12. Are the audiometric tests air conduction pure-tone threshold tests which include the frequencies 500 Hz, 1000 Hz, 2000 Hz, 3000 Hz, 4000 Hz, and 6000 Hz?	_____	_____
13. Are the audiometric tests conducted with equipment that meets ANSI standards S3.6-1969 (document on file)?	_____	_____
14. Are the audiometric tests conducted in an environment (room) meeting current OSHA requirements (document on file) and are the ambient noise levels recorded in your file?	_____	_____
15. Are biological audiometer calibrations, including listening checks, performed each day prior to testing (document on file)?	_____	_____
16. Are all audiograms calibrated electroacoustically at least once a year (document on file)?	_____	_____

E. Hearing Protection Devices

	Yes	No
1. Are hearing protectors made available to all employees exposed to noise 85 dBA-TWA or greater?	_____	_____
2. Are hearing protectors REQUIRED for employees:		
a. exposed to 90 dBA-TWA or greater?	_____	_____
b. who have recorded a standard threshold shift?	_____	_____
c. prior to establishing a baseline if the Mobile Test Van exemption is used?	_____	_____
3. Were employees involved in the selection of appropriate hearing protectors?	_____	_____
4. Are employees trained in the use and care of hearing protectors?	_____	_____

	Yes	No
5. Are employees fitted for correct size and type of hearing protector?		
6. *Are anatomical checks made of the ear canal and drum before insert-type protectors are issued?		
7. Are the hearing protectors provided adequate to attenuate noise exposure below 85 dBA-TWA, and is the attenuation method and data recorded?		

F. Training Program

	Yes	No
1. Are all employees exposed to 85 dBA-TWA or greater given an annual training program covering the following areas:		
a. The effects of noise on hearing?		
b. The purpose of hearing protection?		
c. The advantages and disadvantages, and attenuation of various types of hearing protectors?		
d. The selection, care, use and fitting of hearing protectors?		
e. The purpose of audiometric testing?		

G. Recordkeeping

	Yes	No
1. Are copies of the noise standard posted in the work place?		
2. *Is a copy of the most recent survey posted in the workplace?		
3. *Are noise hazard warning signs placed in all areas where exposures exceed 85 dBA-TWA?		
4. Does your company have the following documents on file for ready access upon request:		
a. Record of all employee exposure measurements?		

	Yes	No
b. Copies of all audiograms which have the following information: i. Name ii. Job Classification iii. Date of Audiogram iv. Examiner's name and qualifications v. Date of last electroacoustic calibration vi. Noise exposure of the individual (dBA-TWA)		
c. Records of background noise measurements for the audiometric test room?	_____	_____
5. Are audiometric records retained for the duration of employment?	_____	_____
6. Does your company provide a method of access to the records by the employee?	_____	_____
7. Are noise exposure records retained for the duration of employment or for at least two years?	_____	_____

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Program Audit Results

1. List below the item numbers that were answered "No" in the audit checklist.
2. Identify the Corrective Action that will be taken to address each item.
3. When the Corrective Action has been completed, fill in the Completion Date.

Example:

Item #	Corrective Action	Completion Date
G1	**Obtain and post copy of 1910.95 on Bulletin Board**	**5/30/02**

Item #	Corrective Action	Completion Date

Date of Audit: _____

Audited by: _____