

Navigating OSHA Recordable Hearing Loss and the OSHA 300 Log

In the realm of workplace safety, vigilance is key to protecting employees from potential hazards. When it comes to hearing health, OSHA (Occupational Safety and Health Administration) sets forth specific criteria for recording incidents of hearing loss on the OSHA 300 log. In this blog, we'll delve deeper into the criteria that determine when hearing loss becomes recordable according to OSHA guidelines, empowering employers and employees alike to navigate this aspect of workplace safety with confidence.

OSHA's criteria for recording hearing loss on the OSHA 300 log revolves around two primary metrics: Standard Threshold Shift (STS) and whether or not the current test exceeds OSHA's criteria for normal.

1. Standard Threshold Shift (STS):

- An STS is defined as a change in hearing threshold levels averaging 10 dB or more at 2000, 3000, and 4000 Hertz (Hz) in either ear when compared to the current baseline audiogram.
- The baseline audiogram serves as the reference point for monitoring an employee's hearing status, however a revised baseline may be established under specific conditions outlined by OSHA.
 - Follow-up: If an STS has occurred, the following steps must be completed:
 - Employee to be notified in writing within 21 days.
 - A follow-up investigation to determine the potential causes of the STS and implement appropriate measures to protect the affected employee's hearing health.
 - Fitted or refitted with hearing protection along with education on proper use and care of the hearing protection.

2. Current Test Exceeds Normal Criteria:

- If the calculated age-corrected hearing thresholds for the current test exceed 25 dB at 2000, 3000, or 4000 Hz in either ear, and the employee has experienced a Standard Threshold Shift (STS), the hearing loss is considered recordable.

Other Considerations:

1. Age Correction (if allowed):

- Age correction factors are applied to adjust for the natural decline in hearing that occurs with age. OSHA specifies age correction values based on the employee's age at the time of the audiogram.

2. Retesting:

- A retest may be conducted within 30 days of the annual audiogram.
- If the STS is confirmed on the retest, and meets OSHA's criteria, the employer must record the incident on the OSHA 300 log within 7 days of the retest.

3. Work Relatedness Determination:
 - Determinations must be made by a physician or “licensed health care professional”.
 - Completed on a case-by-case basis.
 - Other considerations may include, but are not limited to, the following:
 - Occupational noise exposure
 - Work environment
 - Hearing protection use, attenuation, fit, and insertion
 - Ototoxic exposures
 - Acoustic trauma events
 - Pre-existing conditions
4. STS Repealed on Future Test:
 - If an STS is no longer present on a future routine test, the employer may line out the entry on the OSHA 300 Log.
 - This does not require review by the reviewing professional.
5. Construction, Agriculture, Oil and Gas Drilling and Servicing, and Shipbuilding Industries:
 - These industries are not required to test under the OSHA Noise Standard, however, if they do provide their employees with audiometric testing, then they must record any STSs that meet OSHA’s criteria for recording.

Once an employee's hearing loss meets the criteria outlined by OSHA, it must be recorded on the OSHA 300 log. Here's how the process typically unfolds:

1. Identification: Employers must identify employees who have experienced an STS or age-corrected hearing loss based on audiometric testing results.
2. Documentation: The affected employee's name, job title, date of the audiogram, and hearing loss information must be accurately documented on the OSHA 300 log.
3. Privacy Considerations: Employers should ensure that employee privacy is maintained by withholding specific medical information from the OSHA 300 log, such as the actual numeric values of the hearing thresholds.
4. Retention: OSHA mandates that records of occupational injuries and illnesses, including cases of recordable hearing loss, be retained for a specified period, typically five years.

Navigating the criteria for recording hearing loss on the OSHA 300 log requires a thorough understanding of OSHA's guidelines regarding Standard Threshold Shifts (STS) and age correction. By adhering to these criteria, employers can fulfill their obligations to maintain accurate records of workplace injuries and illnesses, while also prioritizing the health and safety of their employees. Remember, proactive monitoring and compliance with OSHA regulations are essential elements of a comprehensive workplace safety program.