



A Year's End HLPP Review May be Worth Your Time

At year's end or within the first two weeks of a new year, it is a good time to affirm that you have fulfilled compliance in response to actionable events associated with your Hearing Loss Prevention Program. Arguably, the greatest challenge in maintaining an effective and compliant Hearing Loss Prevention Program is records management and documentation. Many a citation has been levied not from failure to test annually, but failure to "cross your T's and dot your I's" on paper in response to actionable shift events.

If new hires have occurred throughout the year, it is wise to check your records to ensure that a baseline test was conducted within six months of the hire date-if they work in 85 dB (or greater) environment. If your company uses our mobile testing service, OSHA waives the six month requirement as long as a valid baseline test is secured within 12 months of hire; appropriately attenuating hearing protection must however be in use.

The clerical requirements of actionable 10 dB Standard Threshold Shift (STS) and potentially OSHA Recordable Shift events are clear. Mandated follow-up in response to identification of a 10 dB STS requires written notification of the event within 21 days of determination/notification. If for some reason a retest is not conducted, or when a shift is confirmed by retest, additional training must be conducted and documented to assure proper protective practices and appropriate protector fit and insertion.

Potential OSHA Recordable events also require clerical oversight. If a 30 day retest is not attempted or anticipated in response to a Recordable event, and/or an event is confirmed (or shown to be persistent), that event must be posted to the OSHA 300 log form within 7 days of notification or knowledge of the STS.

In the event that a year's end review does in fact reveal unresolved clerical issues, the adage "better late than never" certainly applies and take comfort in knowing that T K Group can provide replacement documentation (i.e. notification letters, determinations, etc) if for some reason documents are misplaced.

T K Group management reports inform you if a potentially Recordable shift event remains unconfirmed by retest and/or if that event was shown persistent or non-persistent by a latent (non-30 day) retest. In the event that an unconfirmed Recordable event is revealed upon a year's end review, you may conduct what would be considered a "latent" retest to determine if that event is persistent or non-persistent; a non-persistent outcome would allow you to line that event off the 300 log form (assuming that you logged it at the time of initial notification).

If you elect not to conduct a latent retest, you may elect to request a Work Relatedness Determination, retrospectively. If a determination deems the event non-work related, a line-off is also permitted



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