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# The THRESHOLD

A T K GROUP PUBLICATION DEVOTED TO OCCUPATIONAL HEARING LOSS PREVENTION AND PROGRAM MANAGEMENT

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We are conducting a Certification/Re-certification class in July in Cherry Valley, IL. Stay tuned for dates.

## OSHA Reiterates Proper Consideration Guidelines When Determining Work Related Hearing Loss

In February of 2012, OSHA released a FAQ (Frequently Asked Questions) addressing proper consideration that health care professionals follow when determining if potentially Recordable hearing loss events are occupationally related.

Question 10-4 in the FAQ states the following: *What rules must an employer ensure that a physician or other licensed healthcare professional use to make a determination that a hearing loss case is not work related under section 1904 10(B) (6)?*

OSHA states the following: **“If an event or exposure in the work environment either caused or contributed to the hearing loss, or significantly aggravated a pre-existing hearing loss, the physician or licensed healthcare professional must consider the case to be work related. It is not necessary for work to be the sole cause, or the predominant cause, or even a substantial cause of the hearing loss; any contribution from work makes the case work related. The employer is responsible for ensuring that the PLHCP applies the analysis in Section 1904-5 when evaluating work related hearing loss; if the employer chooses to rely on the PLHSP’s opinion in determining recordability”**

Please be assured that T K Group has always taken this approach when determining potentially Recordable hearing loss.

All determination requests may be sent to [determinations@tkontheweb.com](mailto:determinations@tkontheweb.com)

## Medical Referrals: A Review

Upon professional review of test data by T K Group, an employee may receive a Medical Referral Recommendation and/or a Medical Referral Advisory. Medical Referral Recommendations are generated by computer analysis when certain audiometric criterion are met. Medical Referral *Advisories* are generated by the reviewing Audiologist when a potentially emergent condition is observed.

While some corporations opt to cover the cost of referral (physician) consultations, there is no requirement to do so unless a physician determines that a condition is directly related to employment.

Medical Referral recipients do not require a retest unless there is a concurrent 10 dB STS. The compliance requirement regarding Medical Referrals is that the recipient be notified of the referral status in writing; the recipient may, on their own accord, choose to seek physician consultation.

If your facility is mobile tested by T K Group and on-board Employee Notification Letters are provided, letters contain applicable (Medical) referral notification and thus your referral compliance requirement is satisfied.

If you opt not to receive on-board letters, be certain that you distribute the Employee Notification Letters provided to you in the final report to all persons with referral status.

Since OSHA does not mandate a referral criterion, T K Group adopts the American Association of Otolaryngology (AAO) Otologic Referral Criteria for use in Occupational Hearing Loss Prevention Programs:

(For Baseline [first test] Audiograms)

An averaged hearing level at 500, 1000, 2000, and 3000 Hz greater than 25 dB, in either ear.

A difference in average hearing level between the better and poorer ears of more than 15 dB at 5000, 1000, and 2000 Hz.

A difference in average hearing level between the better and poorer ears of more than 30 dB at 3000, 4000, and 6000 Hz.

(For Annual Audiograms)

A change for the worse in average hearing level, in either ear, compared to the baseline audiogram of more than 15 dB at 500, 1000, and 2000 Hz.

A change for the worse in average hearing level, in either ear, compared to the baseline audiogram of more than 20 dB at 3000, 4000, and 6000 Hz.

[datacenter@tkontheweb.com](mailto:datacenter@tkontheweb.com)

As a reminder, all data in electronic formats may be emailed to [datacenter@tkontheweb.com](mailto:datacenter@tkontheweb.com) T K Group asks that duplicate emails not be sent to Dr. Robert Williams. Thank you for your assistance!

## 10 dB STS and Potential Recordables Defined

As per 29 CFR 1910.95 (The OSHA Noise Standard), A 10 dB Standard Threshold is defined as a 10 dB or greater age corrected shift from baseline (or revised baseline) as averaged at 2000, 3000, and 4000 Hz. Ear ear must maintain separate baselines.

A 10 dB STS becomes potentially Recordable when the pure average at 2000, 3000, and 4000 Hz is 25 dB or greater.

A common misperception is that Recordable events drives baseline revision. Baseline revision is made solely on 10 dB STS activity.

If you are new to T K Group, or if you are simply interested in receiving email notification of new newsletter postings, please email [robertwilliams@tkontheweb.com](mailto:robertwilliams@tkontheweb.com) and type "Add to Newsletter" in the subject line.

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The Threshold is written by Robert Williams, A.u.D.

## Study Suggests Greater Risk of Falls With Increased Hearing Loss

A recent study published by Johns Hopkins University School of Medicine suggests greater risk of fall with advancing hearing loss.

The study found that a person's risk of falling three times for those with a 25 dB hearing loss compared to those with lesser hearing loss. With every additional loss of 10 dB, the risk increases nearly 1 and one-half times.

Dr. Frank Lin suggests that hearing impaired persons have less awareness of their general environment, thus raising risk of falls.

Another thing to keep in mind is that the inner ear controls our balance and equilibrium. With increased age and hearing loss, it is quite possible that the inner ear mechanisms responsible for maintaining equilibrium deteriorate as well.

## Occupationally Related Determinations For Non-Noise Exposed Employees

Very often, clients submit an Extended Questionnaire for a work relatedness determination when a potentially OSHA Recordable hearing loss event is sustained. After investigation, they learn that the employee is not exposed to noise equal to or greater than 85 dB 8 Hr. TWA. They will then contact T K Group and request the determination be reversed and re-written.

While T K Group cannot reverse the determination, the client may elect not to record the event if they have recent and reliable dosimetry on that employee, since they are not technically covered under the Federal noise standard (29 CFR 1910.95). If there, however, is any doubt as to the employee's noise exposure, T K Group suggests that the event be logged on the 300 form.