



## HEARING CONSERVATION PROGRAM SUMMARY

The Hearing Conservation Program (29 CFR 1910.95) ensures that University employees, staff members, and students who are exposed to hazardous noise levels are adequately protected to prevent hearing loss. This program overview describes the key components to the program including the groups and personnel working together to implement the program and the internal procedures. [Appendix A](#) provides more detailed regulatory information for reference.

- 1. Noise Assessments:** EH&S works with schools and departments to identify potential work areas and operations where a potential noise exposure exists. Many facilities related operations e.g. steam or chilled water plant, etc.) are areas where noise exposures can approach or exceed the action level of 85dBa (8-hour time weighted average). In addition, in some cases, an individual pieces or set of equipment within a lab or building can present a potential noise hazard for employees depending upon their work in or around this equipment during the workday. EH&S conducts noise surveys of the work area and employees to determine noise levels. If an action level or PEL is reached, EH&S will investigate with customers potential engineering controls to lower noise level and minimize exposure. If infeasible to implement engineering or administration controls, affected employees (typically by job class or category in that area) become enrolled in the Hearing Conservation Program and receive baseline testing and personal protective equipment.
- 2. Baseline Hearing Exam and Training:** Initial baseline testing and training must occur immediately and can be achieved at Mt. Auburn Hospital or a third-party audiometric testing vehicle. Copies of the baseline test must be maintained in personnel file. Following testing/training, employees will then be tested annually with a third-party audiometric testing.
- 3. Annual Audiometric Testing:** EH&S and Human Resources contract a third-party vendor, *Industrial Hearing Testing (IHT)*, to conduct annual testing for the employees enrolled in the program. Each employee tested views a safety DVD which meets the training requirements of 29 CFR 1910.95(k). Training topics covered include;
  - the effects of noise on hearing;
  - the purpose of hearing protection,
  - the advantages/disadvantages and attenuation of various types of protectors,
  - instructions on selection, fitting, use and care of protectors;
  - the purpose of audiometric testing,
  - and an explanation of testing procedures



After an analysis is complete, *Industrial Hearing Testing* provides the Human Resources and EH&S with a report detailing the audiological findings for each employee enrolled in the program. Human Resources must promptly (no more than 21 days) deliver the reports to each respective supervisor. Supervisors are responsible for providing reports to their employees with an explanation of the content of the report.

- 4. Standard Threshold Shift:** For employees whose test results indicate a significant hearing loss from the baseline data, EH&S will work with Supervisors and HR to implement necessary steps. These include checking the fit of hearing protection, re-educating employees and re-assessing noise levels. The supervisor (and EH&S) will coordinate to notify the employee and require them to be re-tested immediately at Mt. Auburn hospital. This will typically be OSHA reportable and EH&S will conduct an evaluation to determine alterations to PPE or administrative controls.



## Appendix A

### Regulatory Overview:

The employer must administer a continuing, effective hearing conservation program whenever employee noise exposures are at or above an eight hour time-weighted average (TWA) of **85 dBA** or, equivalently, a dose of 50 percent ([29 CFR 1910.95\(c\)\(1\)](#)). This is referred to as the action level ([29 CFR 1910.95\(c\)\(2\)](#)).

In 2011, 84 Campus Services employees were enrolled in the Hearing Conservation Program from the following operations:

- Blackstone Steam Plant**
- Landscape Services**
- Electrical Distribution**
- The Chilled Water Plant**

Campus Services and the Human Resources Department currently schedules annual testing of employees enrolled in the hearing conservation program every March.

### Minimum requirements of a hearing conservation program are included in the following sections:

- [Monitoring Program](#)
- [Audiometric Testing Program](#)
- [Hearing Protection Devices \(HPDs\)](#)
- [Employee Training and Education](#)
- [Recordkeeping](#)

### Publications:

#### OSHA Hearing Conservation Program

OSHA's hearing conservation program is designed to protect workers with significant occupational noise exposures from hearing impairment even if they are subject to such noise exposures over their entire working lifetimes.

This publication summarizes the required component of OSHA's hearing conservation program for general industry. It covers monitoring, audiometric testing, hearing protectors, training, and recordkeeping requirements.

**Link:** [OSHA Hearing Conservation Program Publication](#)



**National Institute of Occupational Safety & Health Fact Sheet (NIOSH)**

Work-related hearing loss continues to be a critical workplace safety and health issue. Noise-induced hearing loss is 100 percent preventable but once acquired, hearing loss is permanent and irreversible. Therefore, prevention measures must be taken by employers and workers to ensure the protection of workers' hearing.

**Link:** [Work Related Hearing Loss](#)

**Harvard University Hearing Conservation Program**

Harvard University has implemented a Hearing Conservation Program (HCP) to ensure that all employees, staff members, and students who are exposed to hazardous noise levels are adequately protected to prevent hearing loss. The HCP is designed to comply with the requirements established by the Occupational Safety and Health Administration's (OSHA) Occupational Noise Exposure Standard (29 CFR 1910.95).

**Link:** [Harvard Hearing Conservation](#)