

Recordkeeping and Program Evaluation

by: Kirsten McCall, AuD CCC-A

Purpose

To comprehend the components of hearing conservation program recordkeeping and evaluation.

Chapter Topics

- Requirements and Importance of Accurate Records
- Characteristics of Good Records
- Regulatory Recordkeeping Requirements
- Types of Records
- Hearing Conservation Program Evaluation

Requirements and Importance of Accurate Records

Most components of a **hearing conservation program** (HCP) typically involve face-to-face contact with workers. However, accurate and complete records are the only evidence that the HCP is working correctly and consistently. Valid records are needed for 1) comparison of baseline and annual/periodic audiograms, 2) documentation to give to the **professional supervisor** (PS) and 3) evidence of regulatory compliance and evaluation of the effectiveness of the program.

Regulations require recordkeeping. When a government inspector visits a company, they want to know about workers' **noise-exposure monitoring**. The inspector needs to examine records to see which workers are noise exposed and which ones, if any, have experienced a **standard threshold shift** (STS), and determine whether the **audiometric monitoring** was done properly by qualified technicians with calibrated equipment in a room with sufficiently low background noise levels. Only with clear and complete records can the regulatory requirements be satisfied.

Military HCP regulations meet, and in many categories exceed, Occupational Safety and Health Administration (OSHA) guidelines, including those pertaining to recordkeeping.¹ The military's level of standardization in terms of data generation, collection, transmission and storage is more rigid than those of some private industrial HCPs. Records are kept not only on the active-duty workforce but also on reservists, National Guard members, and all noise-exposed civilians who work for

the Department of Defense (DoD). Qualifications for the DoD are complex and beyond the scope of this manual. For more information, consult the relevant military service component instructions. Individual states have occupational HCPs as well. Like DoD and other US agencies, their programs are based on OSHA and must meet or exceed those requirements.

In all HCPs, accurate **audiometric** records are critical for comparing periodic results to baseline audiograms. Without them, this comparison is meaningless, and the program is in violation of government regulations. Comparison of records is the only way to identify an STS or a gradual deterioration of hearing. Records are also necessary to assess the effectiveness of an overall HCP, which is discussed in detail later in this chapter. Other reasons for keeping good records are to assess priorities for **engineering controls**, use for training and motivation (Ch. 15) and provide **audiogram** reviewers with the required documentation. According to OSHA and the Mine Safety and Health Administration (MSHA),^{1,2} the reviewer needs at least a copy of the noise regulation, records of the worker's **baseline audiogram** and most recent **hearing threshold levels**, measurements of the background sound levels in the **audiometric monitoring** environment, and records of **audiometer calibrations**. Individual workers and their representatives are also entitled to copies of their records on request.

Records create a "paper trail" in case information is needed for workers' compensation claims, a dispute involving OSHA or another employer, or a court case. Although all of a worker's records may be necessary, the pre-placement, or first audiogram, and the exit audiogram may be particularly important.

Characteristics of Good Records

The most important features of good records are accuracy, thoroughness, organization and legibility (if no one can read them, they won't be very useful.) Paper records should be typed or neatly written in pen with no erasures. Electronic records should be easily retrievable. These records are reviewed by the PS and, possibly, company officials, government inspectors, workers and others in the organization's medical or safety departments. In addition, records need to be consistent with company policies and procedures (eg, some companies ask workers to sign their audiometric records and case his-