CAOHC organized a special Focus Group on Occupational Hearing Conservation (OHC) certification on April 17th in Salt Lake City, Utah. The purpose of the meeting was to determine how to better respond to needs among OHCs and their professional supervision in occupational hearing conservation programs.

CAOHC’s Council is interested to hear what causes the variations in the certification process. For example, many OHCs apply for certification directly after a CAOHC-accredited training program. Others delay the certification process or never certify at all.

CAOHC is selecting methods to improve the certification process and to determine the strengths and shortcomings related to CAOHC certification.

In the past, OHCs have expressed concern that the certification process is not clearly explained in the training programs. Many OHCs leave the OHC training courses with the impression that mere attendance at the course grants CAOHC certification. This is not the case—there is an application process to complete once the course is finished.

Over the past few years, CAOHC has equipped Course Directors with more information and more materials to educate the OHC on the certification process. Some Course Directors—in order to expedite the certification process—will include the price of certification with the course fee.

Government and private authorities look on CAOHC as the major recognized authority on the training and certification of occupational hearing conservationists in the U.S. CAOHC certification gives the individual OHC more credibility and offers training recognized by the highest standards.

The April 17th Focus Group was hosted by CAOHC’s Immediate Past Chair Barbara Panchorst, its current Secretary-Treasurer Richard Dahlenden, and CAOHC’s Executive Director Janet Haynes. The Council invited five participants active in the field of occupational hearing conservation and training: Andrew P. Stewart, MA, CCC-A, Timothy Swisher, MA, CCC-A, Melanie Meyers, MS, Robert W. Edris, and Linde Doddly, RN.

The Council has selected this to be an important part of CAOHC’s ongoing Long Range Strategic Plan and is interested in input from Update readers. If you have any comments regarding the certification process, please let the CAOHC office know.

Applications Being Accepted for Fall Course Director Workshop

The October 1996 Course Director Workshop will be held Monday, October 7 at the Sheraton New Orleans in New Orleans, Louisiana. You should attend this workshop if you are planning to certify by the workshop method and are a CD who certified/recertified within the last five years. If you plan to attend the workshop for initial certification, you must complete an application, pay a $100 non-refundable certification fee, and be approved by CAOHC’s Screening Committee prior to the Workshop. Applications are currently being accepted and reviewed by CAOHC’s Screening Committee.

Screening Process takes a number of days to complete, so don’t delay getting the application submitted. Applications will be accepted until September 6, 1996. Registration for the workshop is $225 and includes a CAOHC manual. After September 6, a late fee of $25 is added.) Recertification is an additional $25.

This is an ASHA-approved program offered for 7 CEUs of continuing education credit. A brochure on the workshop is now available.

For more information on the CD application, refer to page 6, “The CD Application: Some Guidelines.”
The issue of OSHA recordability is more than an emotional one for managers and OHCS working in industry. It is a fact that company’s safety records are often reviewed by outside contractors, insurance companies, potential employees and, of course, OSHA. This is not a matter to be taken lightly, as a high incidence of recordable events can create costs to the employer in the form of higher contractor bids, insurance premiums and potential loss of corporate image.

The amount of hearing shift required to trigger a recordable event is currently 25 dB (average at 2, 3, and 4 kHz) at the federal level. State OSHA requirements may vary (see “Notice in Washington over Hearing Loss Recordability”, Susan McGregor, Update, Vol. 6, No. 1, April 1999). As the article on page 4 of this issue outlines, OSHA is now recommending an average shift of 15 dB for the recordable event. Needles to say, that has raised a great deal of response from both industry and professional associations, and is under consideration by the Agency.

As the debate intensifies over recordability, all parties should not lose sight of the other important issues surrounding this action. OSHA has also recommended as part of their proposal that all shifts are to be recorded within 30 days of the test. This means that if a retest is conducted within 30 days of the test, the employer could not exercise the line out procedure. Often companies do not receive the actual results of the annual test for several weeks following the test setting. In addition, scheduling the optional retest may exceed the 30-day period due to work schedules, clinic setbacks or employee absences and vacations. This would undoubtedly mean that many shifts in hearing would be recorded that are not persistent.

The other issue of importance in this recommendation is OSHA’s persuasion of work relatedness. We know that Temporary Threshold Shift (TTS) is frequently an unexplainable event and frankly, often is not related to noise exposure on the job. Every OHC deals with employees that demonstrate fatigue, persistent tinnitus, composure, anger, uncooperative behavior or may have personal ear disorders. These are very tough situations to obtain reliable audiograms and are difficult to detect in the routine test setting. The outcome is frequently TTS that may not represent a valid test and certainly is not work related.

It appears that through these recommendations OSHA would like to encourage the rapid return of reports to the company by those professionals reviewing tests and simultaneously emphasize the importance of retesting in a prompt manner to effectively identify persistent shifts that are work related. If that is the case, I think we all can live with those axioms of good hearing conservation practice. In the course of setting the new criteria, the Agency should also consider the overall importance of the OSHA log on the employer’s bottom line and focus on the professionals that have the ultimate responsibility for the hearing conservation program. The article in this issue of the Update references the overwhelming support of those organizations.

Let your voice be heard. There are over 16,000 CAOHC certified OHCS, most of whom are working in industry and many who have the OSHA 200 log responsibility. You will have to live with whatever the Agency considers to be appropriate.

New Service to OHCS

You can find CAOHC on the Internet! Look for our web site at:
http://www.globaldialog.com/~caohc/
Or you can E-Mail our office at: caohc@globaldialog.com
Seeking Employment

The Update publishes job opportunities in the field of hearing conservation, from both employers and employees. If you are an employer and would like to advertise an available position, please send your classified ad in writing, with a $15 payment (check or money order) to CAOHC at 611 E. Wells Street, Milwaukee, WI 53202.

If you are an OHC looking for employment, please send a cover letter and your most recent resume. There is no charge to certify CAOHC OHC's for this service.

The Update received the following resume from an OHC who is currently seeking employment. If you would like additional information on any applicant, please contact the CAOHC office.

Patricia Midash-Kithas is seeking a full- or part-time position in the Pittsburgh, PA area starting in June 1996. She would like to work in corporations, businesses, and educational departments in meeting their needs in the area of clinical audiology, rehabilitation, hearing aid management, and hearing conservation.

She has experience with the Army's hearing conservation program. Ms. Midash-Kithas can be reached at 888 So. Dexter St. 304, Denver, CO 80222. Phone: 303/337-1548.

Please call Barbara Lechner at the CAOHC office for more information on publishing job opportunities.

Dr. Maurice H. Miller Receives Award

The American Academy of Audiology awarded its Award in Hearing to Maurice H. Miller, Ph.D., at its Annual Convention in Salt Lake City on April 18, 1996. The award is presented to Dr. Miller "in recognition of his distinguished career in Audiology spanning forty years in research, teaching, and clinical service."

Dr. Miller was the first audiology to be elected Chair of CAOHC's Council. He was also commissioned by the Council as the first co-edited the Hearing Conservation Manual which is used to train occupational hearing conservationists.

Dr. Miller, a resident of Lawrence, N.Y., a Professor of Speech Language Pathology and Audiology at New York University. He was formerly Chair of the NYU program. He has had academic positions at the SUNY Health Science Center in Brooklyn, Columbia University and the College of Physicians and Surgeons and at NYU since 1963. For over 40 years, he directed clinical programs in Audiology and Speech-Language Pathology at Kings County Hospital Center, Columbia Presbyterian Medical Center, Lenox Hill Hospital, Bethesd Medical Center and University Hospital of NYU Medical Center.

Dr. Miller is the Chief Audiological Consultant to the NYC Department of Health, a position he has held for over 35 years. He is also the Chair of the Health Department's Advisory Committee on Communicative Disorders. He has published over 125 articles in peer reviewed journals, five books, and numerous monographs and chapters in major texts.

Dennis Driscoll Appointed President of NHCA

Dennis Driscoll, MS, PE, CAOHC's representative of the American Industrial Hygiene Association (AIHA), has been named President of the National Hearing Conservation Association (NHCA).

Driscoll is currently the President and Principal Consultant of Associates in Acoustics, Inc. in Evergreen, Colorado. His term with NHCA began in February and will end February 1997.

Events

AOHC Conference

-San Antonio, Texas-

CAOHC recently exhibited at the American Occupational Health Conference (AOHC) at the San Antonio Convention Center in San Antonio, Texas. The conference (April 30 - May 2) is the annual spring meeting of both the American Association of Occupational Health Nurses and the American College of Occupational and Environmental Medicine.

The exhibits are aimed at updating participants on the latest technology, products, and services relating to pharmaceuticals, equipment, drug testing, ergonomics, software, environmental products and services. CAOHC's presence at the conference helps AOHC attendees who are also CAOHC certified to verify their certification status; to review the Course Director Listing for upcoming CAOHC courses in their areas; to purchase the Hearing Conservation Manual; to review the CAOHC Update; or to find out how to become CAOHC certified.

CAOHC CD Workshop

-San Francisco, California-

CAOHC held its Spring Council Meeting and Course Director Workshop on February 20 and 21, respectively. The meetings were held at the Grand Hyatt on Union Square in San Francisco.

The workshop was designed to both certify new CDIs and recertify current CDIs whose certification period was ending. Workshop attendees gave the program very positive evaluations. CAOHC was an affiliate of the National Hearing Conservation Association Conference, and sponsored a Wine & Cheese reception for both NHCA and CAOHC attendees. Congratulations to all newly certified and recertifying Course Directors.
Development of an AIHA Statement on a Recommended Criterion for Recording Occupational Hearing Loss on OSHA Form 300

By Elliot Berger, MS; Chair, AIHA Noise Committee

On February 2, 1996, OSHA published a notice of proposed rule making (NPR) in the Federal Register regarding Occupational Injury and Illness Recording and Reporting Requirements. Among other items, it addressed the issue of recordability of noise-induced hearing loss. In brief, OSHA recommended:

Employers would record any work-related case resulting in an average shift of 15 dB or more at 2000, 3000, and 4000 Hz in one or both ears as measured from employee’s original baseline established under 29 CFR 1910.95. The hearing test may be adjusted for aging and the recorded case may be removed if a retest performed within 30 days does not confirm the original shift. A presumption of work-relatedness is used for hearing loss occurring to employees covered by the Noise Exposure standard, i.e., those who are exposed to noise levels in excess of an 85 dB 8-hour TWA.

OSHA also included questions in their proposal about whether 10, 20, or 25 dB would be more suitable, and if age corrections should be included. Public comments were welcomed at a meeting held from March 26 - 28 at the Department of Labor in Washington, and also in writing with a due date of May 2, 1996.

The American Industrial Hygiene Association (AIHA) Noise Committee previously took a leadership role in this debate with the publication in the AIHA Journal of a position paper by Driscoll and Morrill ([1987] “A position paper on a recommended criterion for recording occupational hearing loss on the OSHA Form 200,” Vol. 48(11), pp. A714-A716). Essentially the paper recommended a confirmed work-related STS (with age correction) as a recordable hearing loss. With this in mind, a coalition of professional and consumer organizations requested AIHA to re-visit and if needed, update, the 1987 position paper.

The following position statement was developed by the AIHA’s current Noise Committee. The position affirms the AIHA’s 1987 position statement, with clarification regarding the actual recording of STSs on Form 300 (the replacement for Form 200), discussion of new material on recommendations for listing out STSs after the fact, and the addition of answers to various questions that OSHA included in its notice of proposed rule making.

This AIHA document formed the basis for a statement submitted to OSHA by the coalition of organizations referenced above. The coalition consisted of: Acoustical Society of America (ASA); American Industrial Hygiene Association (AIHA); American Speech-Language-Hearing Association (ASHA); Institute of Noise Control Engineering (INCE); National Hearing Conservation Association (NHCA); and the Council for Accreditation in Occupational Hearing Conservation (CAOHC).

The Position Statement is as follows:

The Roster study found that an STS of 10 dB or greater average at 2000, 3000, and 4000 Hz produced the largest annual percentage of unnecessary identifications/assignments (false positives) of the various definitions evaluated. Because of its concentration on the regressions that are the easiest or the most severely affected by noise, the resulting high degree of apparently appropriate identifications may follow-on and the simplicity of the definition, AIHA believes that the definition of STS which it is adopting today will contribute more to the effectiveness of hearing conservation programs than any other definition considered.

Recommended criteria for recording hearing shifts on Form 300

AIHA’s recommendation is to record confirmed (i.e., persistent, work-related OSHA Standard Threshold Shifts (STSs)) on Form 300. An STS is defined as a change from the baseline audiogram of 10 dB or more in the average of thresholds at 2000, 3000, and 4000 Hz in either ear, after adjustments for age correction. The noise level of exposure to TWAs of 85 dB or greater is considered sufficient to confirm that an STS is work-related; rather, the complete procedure outlined on page A-715 of the 1987 position statement should be implemented. Also on page A-715 is discussion of the importance of recording confirmed 10 dB work-related shifts even though they may not represent compensable hearing loss.

Specific details regarding recordability of hearing shifts

In the 1987 AIHA position, statements were made concerning the requirement for a 30-day retest, and presumption of a persistent STS in the absence of such a retest. Those statements were based upon the OSHA requirements in the Hearing Conservation Amendment pertaining to a retest; potential notification of the
employee concerning any hearing changes, and subsequent follow-up [29 CFR 1910.95(g)(7)]. However, in the current OSHA proposal it would appear that all shifts meeting the OSHA recordability criterion, confirmed or otherwise, are to be recorded on Form 300, and then later lined out if found to be persistent. This urgency in recording shifts, regardless of confirmation, does not appear justified, and creates additional burdens for the employer. A more efficient, and yet suitably protective and accurate approach is recommended as follows:

- Only confirmed (i.e., persistent) work-related STSs are to be recorded on Form 300, unless a follow-up audiogram is not administered as described in the following bulleted item. The scope involving confirmation of STSs and work-relatedness include an optional follow-up audiogram and the procedures summarized in the following section of this document, which are described in greater detail on page A-715 of the 1987 position statement.

- If a follow-up audiogram is not administered within 30 days of the initial determination of the STS, or if the follow-up audiogram confirms the STS, then the shift is considered persistent, and if determined to be work related, must be recorded on Form 300.

- A follow-up audiogram is given within 30 days of the initial determination of the STS that does not confirm the STS, nothing is to be recorded on Form 300.

Clarification regarding current OSHA proposal on work-relatedness

The current OSHA notice of proposed rulemaking attempts to make the presumption of work-relatedness whenever an STS is detected, whether or not it is confirmed, as long as the employee is exposed to TWA" in excess of 85 dBA. The A1HA position does not support this recommendation, but rather requires confirmation of the persistence of the STS, as well as consideration of the employee's prior occupational and non-occupational exposure, evaluation of calibration records and the audiometric environment, investigation of related activity and personal medical conditions that could influence thresholds, and age corrections, before a hearing loss is presumed to be work related. See page A-715 for suggested steps to follow in the determination of work-relatedness.

Procedure for lining out STSs from the Form 300

It is widely recognized that many occurrences of STS will be temporary in nature. Therefore, it is valuable to identify shifts in hearing while they are still temporary so that follow-up action can be taken before they become permanent. However, it is inappropriate to record such temporary shifts as indicative of the occurrence of occupational illness. Furthermore, companies are usually hesitant to record any incidents on Form 200 proposed for Form 300, even if lining out the event at a later date is an option. Therefore, the procedures in the preceding sections are intended to avoid needlessly recording and lining out. Despite these efforts, line outs may be necessary and should be permitted with the following stipulation:

- At the discretion of the reviewing professional, within 15 months of the initial identification of the STS, any STSs which are just confirmed by subsequent retesting or otherwise found to be not work related may be lined out on Form 300. Documentation justifying line outs must be provided and should be retained with the employees' records.

The 15-month time frame was selected since employers are only required to test hearing on an annual basis, and thus the recommended time frame should provide sufficient opportunity and leverage to apply the results of a succeeding annual test to the final determination of persistence and work-relatedness.

Response to OSHA queries

Implicit in the A1HA position are answers to other of OSHA's questions.

- The recommended recording criterion is 10 dB for reasons described in the 1987 position paper and in attachment #2. In brief, A1HA agrees with OSHA's assertion that an extra 5-dB allowance is needed to account for audiometric variability. The A1HA guidelines for evaluating work-relatedness take audiometric calibration shifts into account; such audiometric errors occur infrequently and should be avoided. Random measurement variability can be reduced through training, and A1HA's recommendation that only persistent confirmed shifts be recorded minimizes this problem. It is unfair to allow additional true hearing loss among employees in hearing conservation programs with stable data in order to account for data deficiencies in poorer programs.

- Baselines for Form 300 should either be reexamination audiograms or the revised baseline as defined in 1.1910.95(g)(9). Although the OSHA criteria for reexamination audiograms are general in nature allowing a wide latitude of professional judgment, the results of a five-year effort of an ad hoc committee of the National Hearing Conservation Association (NCHA), [NCHA #1990] have recently resulted in specific consensus professional guidelines for baseline revision, that merit consideration.

- Presbycusis corrections should be permitted as described in the 1987 A1HA paper.

Supporting technical information

Dr. Julie Royse has applied the calculation procedures of the ANSI S3.44-1996 to compute expected hearing loss resulting for typical occupational noise exposures, and she along with Mr. Andrew Stewart have also analyzed a number of industrial audiometric data bases. Their observations and conclusions (supporting document #2 and #3), substantiate the recommendations described above.

The supporting documents referred to in the position statement are available from A1HA.
The CAOHC Course Director Application: Some Guidelines

By William H. Monk
CAOHC Screening Committee Chair

As the new Chairperson for the Screening Committee, I thought it might be useful to provide some guidance and helpful hints for completing the application for certification or recertification as a CAOHC Course Director (CD). It is important to understand that there are differences in the requirements for certification and recertification.

Certification Requirements

2) Current license by state or territory of the United States for practice of medicine, nursing, or audiology; or certificate of clinical competence in audiology by American Speech-Language-Hearing Association; or board certification by American Board of Industrial Hygiene; or current membership in the American Society of Safety Engineers.

3) The experience requirement can be met in one of two ways:
   a) documentation of a minimum of one year experience and 1000 hours directly working in hearing conservation during the past five years. It is important to be specific when describing your work experience, or
   b) participation as a faculty member in four CAOHC-approved workshops and 1000 hours directly working in hearing conservation during the past five years.

   The 1000-hour experience must be met under both circumstances and must include letters or endorsements from your supervisor or professional colleague. Applications are due in the CAOHC office at least 30 days prior to the upcoming workshop. Applications received after this 30-day cutoff are assessed a $25 late fee.

New CDs must attend a CAOHC-approved 8-hour CD Workshop as well.

Recertification Requirements
1) Current certification as a CAOHC Course Director.
2) Current certification and/or license as indicated on the application.
3) The experience requirement can be met by:
   a) attendance at a CAOHC or CAOHC-approved CD Workshop,
   b) served on a CD for five 20-hour OHC courses with no more than two courses in the same year, or
   c) obtain at least 75 hours of continuing professional education with a minimum of 50 hours directly in occupational hearing conservation, or
   d) combination of options b and c above, with each OHC course counting as 15 Continuing Professional Education (CPE) hours and a maximum of two courses in any one year.

CPE Option
When using the CPE option, you must provide documentation of the hours and the specific breakout of hours to indicate the 50-hour requirement in occupational hearing conservation. For example, a Course Director might attend the National Hearing Conservation Association Conference and then submit an NHCA program agenda with the application. Keep in mind it is important to keep accurate records of all your Continuing Professional Education experiences.

Certification Renewals
Any of the CAOHC Component Professional Organizations can request approval of a CD Workshop. If you attend one of these workshops (for example, the Military Audiology Association sponsors a CD Workshop every five years for their own Course Directors), you must still submit a CAOHC application and the required $25 recertification fee to be recertified.

If you have questions, please contact the CAOHC office for clarification.

OHC Tips: Procedures for Checking Attenuation

To date there is no standard method for checking the attenuation of hearing protectors in the field, but there are procedures that OHCs can use that will give some very good information on how much help a protector is providing. These procedures can also be useful educational tools.

One procedure is to give a group of workers an audiometric test before the beginning of the work shift and then again at the end of the shift. If the hearing threshold levels in certain workers show a deterioration in the second test, then the hearing protectors may not be providing sufficient attenuation (or they are not being worn). Counseling, refitting, and retraining should improve the situation, and the tests can be repeated at a later date.

Another procedure that assesses attenuation more directly applies only to ear plugs. The OHC approaches a worker during the work shift and hands the worker a sign that says "Please don't touch your earplugs," and "Follow me." The OHC takes the worker to the audiology test room and proceeds to test his or her hearing with the plugs in (Continued on pg. 7. See "Attenuation")
**Attenuation**

(Continued from page 6)

place. After that the OHC instructs the worker to remove the plugs and conducts another audiometric test. The difference between the two audiograms represents the amount of attenuation that the worker is receiving at each test frequency. Although the procedure may not be as exact as the laboratory tests, it gives both the OHC and the worker a very good idea of how the worker is doing with the ear plugs.

Council Members & Their Represented Organizations

American College of Occupational & Environmental Medicine
Alex F. Sanchez, Jr., M.D. (1998)
Director of Occupational Medicine, NatiClinic
25 S Randolf Road
Chillicothe, N.C. 28207
Office: (304) 342-8271

American Industrial Hygiene Association
Dennis Driscoll, MS, PE (1997)
Association Enquiries, Inc.
71 Aspen Place
Englewood, CO 80110
Office: (303) 761-9270

Secretary-Treasurer
Military Audiology Association
Walter Reed Army Medical Center
Bethesda, MD 20889

Immediate Past Chair (Ex Officio)
American Association of Occupational Health Nurses
Barbara Fancher, BSN, RN, COHN (1996)
220 Whitsitt Way
Taylors, S.C. 29687
Office: (864) 503-0388

American Speech-Language-Hearing Association
Larry Higdon, MS, CCC-A
Auditory/Speech Advisory Co.
P.O. Box 162073
Austin, TX 78718
Office: (512) 261-4814

American Academy of Otolaryngology
Head & Neck Surgery
Robert A. Dohic, MD (1996)
University of Texas Health Science Center
Department of Otolaryngology - Head & Neck Surgery
7701 Floyd Curl Drive
San Antonio, TX 78229-7777
Office: (210) 562-5615

American Association of Occupational Health Nurses
Nancy A. Craft, RN, COHN (1996)
Navy Environmental Health Center
2310 Whalnut Avenue
Norfolk, VA 23513-2017
Office: (864) 363-5581

American College of Occupational & Environmental Medicine
Michael G. Holthouser, MD, MPH (1997)
C.O.E. Practice, Medical Department
300 New England Ave
Pasadena, MA 01201-3657
Office: (413) 446-4929

BULK RATE
U.S. POSTAGE
PAID
MILWAUKEE, WI
PERMIT NO. 5438

Francisco Ivan Razo-Borrero, BSN
Campo Almager, Acuario Norte Street, I:
Phoenix, AR 06751

Page 8