Policy Needs

Company policies relating to the hearing loss prevention program should be carefully planned and executed to benefit the affected employee and the employer. Experiences with successful hearing loss prevention programs show certain policy areas that management needs to address at the beginning:

1. Corporate environment should promote a safety culture where the employees are empowered to protect their own health and to facilitate the protection of the health of fellow workers.

2. Program policies should be based on effective practices rather than on minimum compliance with government regulations.

3. The hearing loss prevention program must be a functional part of the overall company safety and health program. It should not be a stand-alone, separately-budgeted operation.

4. A key individual (referred to as the program implementor for the rest of this guide) should have ultimate responsibility for the program. This person may not necessarily perform all of the functions of the hearing loss prevention program, but is in charge of the overall program. Experience with successful hearing loss prevention programs shows that a single individual often makes the crucial difference between success and failure. This person is often a nurse or an audiometric technician, but may be a safety and health officer, a supervisor, or a designated employee. This program implementor acts as the conscience and champion of the hearing loss prevention program. He or she focuses the attention of both management and employees on the hearing loss prevention program's policies and ensures that they take the necessary steps to implement them. The program implementor should also have stature in the hearing loss prevention program's organizational chart, with authority to make decisions, correct deficiencies, and enforce necessary actions.

5. The program implementor should work with management and employees to develop and implement hearing loss prevention plans and policies for an effective program. As a team leader, the program implementor should be given the authority to establish hearing loss prevention provisions that meet or exceed the letter and intent of OSHA's noise control and hearing conservation regulations.

6. Employee and administrative compliance with the company's hearing loss prevention program policies and procedures should be a condition of employment.

7. Hearing loss prevention program policies should clearly describe standard operating procedures for each phase of the program. Specific policy statements should be developed for the important elements of the program. For example, it should be company policy to require the participation of all noise-exposed employees in the audiometric program and to require the consistent and proper wearing of hearing protectors in posted areas, even if employees or supervisors are only passing through these areas. These requirements should be conditions of employment. Other important policy statements should be written to cover:

   a. Adopting a prescribed schedule for monitoring of employee noise exposure levels and other risks, including ensuring that equipment and personnel training are
appropriate to the task.

b. Counseling of employees immediately following each audiometric test, whether it is the initial, annual, retest, threshold-shift confirmation, or termination examination.

c. Determining the adequacy and correct use of hearing protection devices by on-site equipment checks.

d. Educating, training, and motivating employees to support the company's hearing loss prevention program provisions; assessing employee attitudes and assessing knowledge gained from periodic training.

e. Establishing a program of quality assurance for the performance of audiometry and management of audiometric records.

f. Reviewing audiometric data to verify the effectiveness of the hearing loss prevention program.

g. Encouraging employees to use company-provided hearing protectors for off-the-job exposure.

h. Purchasing hearing protectors, audiometers, noise measuring equipment, and quieter machinery. This policy should address the reasons why the program implementor responsible for the hearing loss prevention program, not the purchasing department, should have final decision about anticipated purchases.

8. Companies may have varying needs for services which they cannot undertake with in-house staff. These can include noise surveys, employee education, audiometric testing, medical counseling, or the fitting of hearing protection devices. Outside vendors or contractors should be selected carefully so their services complement the abilities of the company staff and functional conduct of the in-house program elements. Vendors must understand and agree to abide by the company's hearing loss prevention program policies and standards of operation. On-site personnel must supervise contractors to make sure that they carry out their obligations. Regardless of whether outside vendors or contractors are used, responsibility for the program stays with the program implementor.

Companies that issue clearly defined hearing loss prevention policies, and then adhere to these policies consistently, will have smoothly running hearing loss prevention programs. Employees will be fully informed, will comprehend their functional role, and will know what is expected of them. Equipment will be appropriate, hearing protection will be used by the right people in the right places, and the program elements will be implemented in a timely fashion.

Further Reading
