

# Annual Hearing Conservation Program Checklist

Use this audit to verify every OSHA 1910.95 requirement is in place. Check each item off as you confirm it. Six program areas. 52 line items.

Organization: \_\_\_\_\_ Site: \_\_\_\_\_ Reviewer: \_\_\_\_\_

Date: \_\_\_\_\_

## 1. Noise Monitoring & Exposure Assessment

*OSHA 1910.95(d) - Identify workers exposed at or above 85 dBA TWA*

- Conduct initial noise survey of all work areas
- Identify employees exposed at or above the 85 dBA action level
- Document noise exposure levels by job role and work area
- Deploy personal dosimeters for workers with variable exposure
- Repeat monitoring when processes, equipment, or controls change
- Maintain noise exposure records with date, location, and methodology
- Post noise monitoring results or notify affected employees

## 2. Audiometric Testing Program

*OSHA 1910.95(g) - Annual audiograms for all noise-exposed workers*

- Establish baseline audiogram within 6 months of first exposure
- Conduct annual audiometric testing for all exposed employees
- Testing by a licensed audiologist, otolaryngologist, or trained technician
- Compare annual audiograms against baseline for Standard Threshold Shifts
- Notify employees of STS within 21 days of determination
- Retest within 30 days if STS is detected (or use as revised baseline)
- Refer employees with confirmed STS for medical evaluation
- Calibrate audiometric equipment per ANSI S3.6 standards
- Ensure test environment meets ANSI S3.1 ambient noise requirements
- Retain all audiometric records for the duration of employment

## 3. Hearing Protection Devices (HPDs)

*OSHA 1910.95(i) - Provide and ensure proper use of hearing protection*

- Provide HPDs at no cost to all employees exposed  $\geq$  85 dBA TWA
- Offer a variety of suitable HPDs (earplugs, earmuffs, canal caps)
- HPDs attenuate exposure below 90 dBA (85 dBA for STS workers)
- Conduct individual fit testing to verify Personal Attenuation Rating
- Train employees on proper insertion, use, and care of HPDs
- Replace damaged or worn HPDs promptly
- Re-evaluate HPD selection when noise levels or conditions change
- Document fit testing results and HPD assignments per employee

#### 4. Training & Education

*OSHA 1910.95(k) - Annual training for all noise-exposed workers*

- Provide initial training at time of enrollment in the program
- Conduct annual refresher training for all exposed employees
- Cover the effects of noise on hearing (permanent & temporary shifts)
- Explain the purpose of audiometric testing and what results mean
- Demonstrate proper selection, fitting, use, and care of HPDs
- Explain the purpose and procedures of noise monitoring
- Inform workers of their right to access exposure and audiometric records
- Document training dates, attendees, and topics covered
- Update training materials when new hazards, equipment, or regulations arise

#### 5. Recordkeeping & Documentation

*OSHA 1910.95(m) - Maintain complete, accessible records*

- Maintain noise exposure measurement records (dates, equipment, methods)
- Retain all audiometric test results for the duration of employment
- Keep records of audiometer calibration and background noise levels
- Document STS determinations and employee notifications
- Store HPD fit testing results and assignment history
- Maintain training records (dates, content, attendees, instructor)
- Ensure records are accessible to employees and OSHA upon request
- Transfer records if the business is sold or an employee leaves
- Back up records in a secure, compliant system (SOC 2, HIPAA if applicable)

#### 6. Program Administration & Oversight

*Best practices - Ensure your program is actively managed and auditable*

- Designate a program administrator or safety officer responsible for the HCP
- Appoint or contract a licensed Professional Supervisor (audiologist/physician)
- Conduct annual program effectiveness review
- Review STS rates and compare against industry benchmarks
- Audit HPD compliance and usage across all sites
- Evaluate engineering and administrative noise controls annually
- Update the written hearing conservation program as regulations change
- Prepare documentation for potential OSHA inspections
- Brief management on compliance status, STS trends, and risk areas