



INTEROFFICE MEMORANDUM
Oregon Occupational Safety & Health Division

August 4, 2000

TO: All OSHA
FROM: Marilyn Schuster, Manager of Standards and Technical Services
SUBJECT: Hearing Loss and OSHA 200 log

This memo is to clarify requirements for Logging Occupational Hearing Loss on the OSHA 200 form.

In the early 1990's we adopted most of the Federal Noise standard with a few exceptions. One exception was not allowing the use of presbycusis charts (age correction factors) when evaluating an employee's yearly hearing test to determine if a Standard Threshold Shift had occurred. The practice of not using the charts for this STS determination is supported by NIOSH. Since the annual test is not to determine the causation of the hearing loss but rather screen and refer problems to a specialist, educate, refit with hearing protection and motivate employees, we are using a conservative proactive method to ensure employee protection.

In the past, since we did not adopt the presbycusis charts, we did not allow the use of them when determining recordability of hearing loss on the OSHA 200 log. We now will **allow the use of the age correction charts only when determining what cases should be recorded on the OSHA 200 log.**

The rationale for allowing this is that the federal rule allows the use of the charts for both determining the STS as defined in the rule and for logging the hearing loss on the OSHA 200. Oregon OSHA does not allow the charts for either. This inconsistency will result in higher and erroneous incidence rates for Oregon, since some of the recorded cases might be the result of aging. The level of protection for the employees will not be affected if we allow the use of the charts only in the recording of the illness.

ACTION:

- The rule will remain unchanged. The presbycusis charts can't be used to determine if a standard threshold shift has occurred, as defined by the rule.
- The use of the presbycusis charts can be used when determining if a case is recordable.