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Noise Regulation Needed

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In today's society most activities are regulated: we are required to be trained and also to show that we are proficient in what we perform.

We cannot imagine driving a car without a valid licence, can we? Instead of a barber pulling out our teeth we go to a licensed dentist. When an electrician comes to our house, we expect him to be also licensed by some reputable organization.

Why this is not the case with people performing audiometric tests in the province of Ontario as is the case in other Canadian provinces? Believe it or not, we don't teach courses, nor do we require licensing. Having the equipment and doing business is sufficient for us.

Let's see what the existing legislation says it that respect:

The key document by the Ontario Ministry of Labor is the Occupational Health and Safety Act, Regulation 851, or Regulation 855 as amended. To help understand it, the ministry produced in 2007 (later amended in 2009) Health and Safety Guidelines to the Amendments to Noise

Requirements In the Regulation for Industrial Establishments & Oil and Gas-Offshore.[1] This is a 23 pages document that deals basically with the noise exposure limits, protective measures and warning signs. There are no requirements (or mention of them) regarding audiometric tests or for audiometric technicians. At the time when the document was produced, several institutions, the Occupational Hygiene Association among them, did signal this important omission. The answer from the ministry was that there will be important opposition for the inclusion and that it could be done at a later date.

Health and Safety Ontario is an umbrella-organization, which, among other functions provides information to employers, workers and small businesses. They have produced a comprehensive

brochure “Hearing Conservation” accessible on the Net.[2] The brochure includes Audiometric Testing as a part of a Hearing Conservation Program. As per the brochure, the following considerations help ensure accurate results:

- The tester must be qualified to conduct audiometric tests.
- Tests must take place in a controlled environment, preferably a testing booth.
- The instruments must be calibrated to ensure accuracy
- The results must be evaluated – either by examining individual audiograms, or by analyzing the results of a group of audiograms– using audiometric data base analytical technique.

However, there is nothing on how to ensure the above conditions.

The document that clearly spells out what is needed for training is the CSA Standard Z107.6-M90,

Pure Tone Air Conduction Threshold Audiometry for Hearing Conservation[3] (presently under

revision). Section 7 Requirements for Test Personnel (Technicians) spells out those requirements including the need for a course of a minimum of 20 hr. The course has to deal with issues such as anatomy of the ear, basics of noise, use of the instrument and ethic considerations.

In other words, it is not the lack of documentation that is generating the actual situation. In the past, several institutions, University of Toronto and the Hearing Society did teach 20-hours courses as mentioned in the standard. However, due to the lack of demand, they were discontinued.

Presently, the Centennial College offers a two-day, 16 hour course (HEAR-800). The only other institution is the University of Western Ontario that offers courses as a part of their Master's of Clinical Science (MClSc) program in audiology, largely exceeding the requirements set in the CSA standard.

In summary, the situation is the classical egg-chicken set-up. The Ministry of Labor does not require audiometric tests to be performed and there is no place that offers training as per the standard. Are we happy with that situation (already solved in some other provinces)? Definitely not! However, there is no doubt that something has to be done about it.

References

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3. CAN/CSA-107.6-M90 - January 1990.