

Overlooked Assessment Tools to Assist with the ADA Accommodation Process

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Even before the Americans with Disabilities Act (ADA), many employers were already seeking positive stay-at-work (SAW) and return-to-work (RTW) outcomes for employees experiencing disabilities. The ADA accommodation process gives us fresh motivation to revisit two important tools for this effort: the physical demands analysis and the ergonomics assessment.

In more than 20 years in the leave management industry, over thousands of accommodations, I have seen many employers that wanted to return employees to their jobs yet did not know what those jobs specifically entailed. Often they knew a job's responsibilities but didn't know the essential job functions. Or if they had those functions outlined, they didn't understand the physical demands entailed in performing the functions.

Many employers utilize job descriptions filed in their human resource (HR) departments as the basis for initiating the ADA accommodation process with the interactive dialogue. Job descriptions are a helpful place to start, yet many are generalized, summing up responsibilities and including blanket statements such as "must be able to lift 40 pounds" when the weight was only esti-

mated and not actually measured.

These summary descriptions often may not break jobs down into essential duties and functions, as well as component tasks, and they don't quantify the physical demands needed to perform each task. Since they lack this level of specificity, they often fall short in providing the information needed to make an appropriate accommodation, which could result in injury or furtherance of the presenting medical and/or psychological condition.

Physical Demands Analysis

A physical demands analysis (PDA) is a process to quantify and qualify the physical demands of the essential job functions and associated tasks. In other words, the PDA will outline what a job is in its entirety and serves as a cornerstone for determining the job's compatibility with a specific employee.

Some employers may request a job analysis, a physical demands checklist, or a functional job analysis. Frankly, these are the same evaluation, but terminology often varies throughout the industry. The main objective is to ensure an evaluator is properly trained in the process of assessing the job and measuring the physical demands it requires.

A PDA should be performed by a qualified health, ergonomics, or safety professional. For example, the assessor

could be a nurse, certified professional ergonomist (CPE), a certified safety professional (CSP), or even a certified athletic trainer (AT). And no matter the professional certification, the assessor should have in-depth education, training, and experience in human factors and biomechanics. In addition, they should be trained to develop a resulting report written in a manner compliant with the ADA. This is important as some cases might undergo litigation, and the resulting PDA report would then serve as a discoverable legal document.

In performing a PDA, the evaluator will visit the employer site, outline the essential job functions, break down those functions into tasks, and measure the physical demands of each task. For example, the expert might use a scale to measure weight in terms of lifting requirements, a tape measure to determine how far objects must be carried, and a force gauge to determine push-pull and grip requirements.

The resulting PDA report will outline the force, frequency, and duration of manual tasks, as well as environmental conditions such as temperature and noise. PDAs are typically ordered by either the HR department, a manager, or a health and safety professional at the employer.

The PDA report should receive review and signoff (after any corrections) by another employee who cur-

rently performs the job in question, along with another representative for the employer, such as a supervisor or manager. This ensures both parties have reviewed and validated the information. In addition, PDAs should be reviewed and updated regularly, especially if jobs evolve over time.

The employer can use the PDA report to determine if an employee's capabilities match the physical requirements of the job. Perhaps the employee can perform every essential function except one, which is outside of his or her capabilities. Knowing the physical requirements of that essential function will allow the employer to make a reasonable accommodation and speed up the interactive process.

In some cases, an employer may request PDAs for several jobs to determine if a particular employee, given his capabilities and restrictions, can perform one of them and to determine if accommodations should be made. Some employers are proactive and obtain PDAs for their most physically demanding jobs, as this can assist with RTW decisions across their integrated absence management program. Without a complete PDA report available to support the accommodation process, an organization can fall weeks behind on SAW and RTW, a huge loss to "early intervention."

Ergonomics Assessments in the ADA Accommodation Process

Most employers are aware of the role ergonomics assessments play in reducing repetitive strain or similar types of injuries in the workplace. Unfortunately, these ergonomics assessments may be overlooked during the ADA accommodation process when they can help identify and address issues that could prevent an employee from safely returning to or staying in a position.

Consider an employee who is returning to an office job in a wheelchair. The employer can use an ergonomics assessment to make sure the employee can access the office. Will he be able to work at his desk with his wheelchair? Will the employer need to install a keyboard tray?

The same types of benefits can be achieved for a stay-at-work situation. For example, an employee may want to stay in her position, but she's having difficulties with certain aspects of the job. Here again, an ergonomics assessment can help determine if reasonable accommodations can be made.

These accommodations can vary significantly depending on the employee's unique limitations and the position's essential job functions. For a factory position, an ergonomics assessment might recommend changing the location of tools and the orientation of material to make them more accessible, reduce physical demands, or eliminate certain postures for the employee.

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Ergonomic assessments are being used more frequently in the ADA accommodation process. There's even an increase in physicians initiating or requesting these assessments, which was unheard of 10 years ago. But in the last five years, more physicians are writing scripts for ergonomics assessments or even more specific items, like a sit-stand workstation or a new office chair because the employee is experiencing back pain.

Sound Assessments, Sound Investments

The most challenging aspect of making an ADA accommodation is not knowing the physical requirements inherent in a job. By obtaining a physical demands analysis or an ergonomics assessment, employers can significantly streamline this process. The assessment results will show employers what a job entails, so they will be empowered to make ADA accommodations faster and more accurately. This saves money and improves employee relations. Another advantage is these assessment tools don't carry a high price tag. When utilizing them, if employers are able to return an employee back to work just one week early, they can achieve a significant return on investment.