

Post-Offer Employment Testing: Ensuring Your Employees Are Fit For Work

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Are you hiring employees who are FIT FOR WORK? Do you have a process in place to “capture” those employees with a previous injury or those who are at risk of sustaining an injury? If you are unable to accurately answer these questions, maybe you should consider implementing post-offer employment testing at your facility.

For many companies, pre-employment medical physicals and fitness screenings are often overlooked. Having the ability to identify and manage inappropriate or fraudulent worker's compensations claims directly impacts bottom line profitability. It is important to identify and document pre-existing impairments in workers entering jobs with risk factors for musculoskeletal injuries. How do companies do this? They initiate baseline examinations of prospective employees to evaluate whether the employees can perform the essential functions of the position. This is called post-offer employment testing.

Post-offer employment testing is a growing area of interest in business and industry. This type of testing is a medical screening under the ADA and may occur during the post-offer stage of the hiring process. The primary purpose of the test is to determine if an applicant can perform the essential functions of the job. Evaluating strength, flexibility, balance, endurance, and coordination provides information as to whether the applicant meets the physical demands of the job. The second purpose is to make the testing process beneficial to the applicant and to the employer by instructing the employee in proper posture, body mechanics, material handling strategies, and injury prevention techniques. The third purpose of the post-offer employment test is to provide recommendations regarding reasonable accommodations if the applicant is a qualified person with a disability and can meet the essential functions of the job with reasonable accommodations.

The ADA requires only post-offer employment testing be conducted as a separate, second step of the selection process, after an individual has met all the other job requirements. The employer may make a job offer to such an individual, conditioned

on the satisfactory outcome of a medical examination. If the employer requires post-offer employment testing, all entering employees in that particular job category must meet the essential functions of the job, as outlined in the testing. The testing does not have to be given to all entering employees in all jobs, only to those in the same job category.

For example, Company A identifies three out of the 16 positions at their facility are the most physically laboring positions and have also been identified as having the highest injury rates. Therefore, Company A would implement post-offer employment testing for all employees entering these physical labor jobs, rather than those entering sedentary or clerical jobs. The ADA does not require an employer to justify its requirement of a post-offer employment test. An employer may wish to conduct a post-offer employment test to determine if the employees have the physical or mental qualifications necessary to perform certain jobs. If a job requires continuous heavy level work (100#), the test would be useful to determine whether the applicant's physical condition would permit him/her to perform the job.

The traditional “employee physical,” including solely the medical physical examination by the physician only gives employers information about whether or not the employee has achieved the medical clearance to perform the job (blood pressure, heart rate, urinalysis/drug screen, etc.). The post-offer employment test looks at the physical requirements. For example, does a 23-year-old, 123-pound female meet the essential functions of a construction worker? If the applicant can safely lift, push, pull, and carry the required physical demands of a construction worker, which are between 75# and 100#. If yes, the applicant would “meet” the essential functions of a construction worker. Does a 40-year-old, 185-pound male meet the essential functions of a “roof bolter” in the coal mine? If the applicant safely meets the requirements for range of motion and pushing/pulling the required amount (100#), but does “not meet” the functions of kneeling, squatting, lifting, and carrying, then the prospective employee would “not meet” the essential functions of a “roof bolter” in the coal mine. In both instances, the employer is only given information describing “met” or “not met,” in regard to the applicant's performance. In such an instance where the applicant did not meet the essential functions of the test, the employer has the final decision as whether or not to hire the applicant.

What are the goals of implementing post offer employment testing?

- Reduce injuries
- Educate employees
- Reduce costs

What are the risks of not implementing post offer employment testing?

- Increased workers compensation costs
- Inappropriate or fraudulent work-related injury claims
- Lost productivity

- Excessive turnover or replacement costs
- Increased future liability and legal expenses

Are you ready to start implementing post-offer employment testing? What about the process? Although the process of establishing the test can be time consuming, once the test is developed, you have implemented a screening tool to identify if the applicant meets the required essential functions to do the job.

The process we use to assist employers with implementing post-offer employment testing includes the following:

- Review current injury data and select those positions which are at high risk for work related injuries.
 - Perform a job analysis for each “high risk” position.
 - Integrate the functional portions of the job analysis into each job description.
 - Develop a test, which includes the most physically demanding parts of the job.
 - Establish test validity to ensure the test measures what it is supposed to measure. We do this by selecting a sample of incumbents (current employees) to perform the test we developed. It is beneficial to make sure that the current employees can “meet” the physical demands of the test and to ensure the test is not too hard or not too easy, but it is a good representation of what is physically required on the job.
- The employees give feedback and make recommendations regarding the test. If needed, the test is then modified to outline the recommendations identified by the employees.
 - Institute the post-offer employment testing into the employment process and add this as a policy for the positions you have identified to test.
 - Consult with your legal counsel and senior management staff to review the process to ensure you are ready to proceed with testing.
 - The test is then ready to begin implementing with new hires for the identified positions.

There are many businesses and industries who have implemented post-offer employment testing. Our team has assisted these employers with developing the right tools and resources in order to successfully mitigate health risks related to hiring and retaining employees.

The question is this, “Are you ready to jump on board and start reducing your worker’s compensation costs?”

If you would like information regarding the legislative guidelines related to employment practices, visit the Equal Employment Opportunity Commission (EEOC) at EEOC.gov or the Department of Justice – American’s With Disabilities Act at USJO.gov. ◀



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