The PDA: One Tool with Multiple Applications

Physical demands assessments can be used within your organization to support multiple objectives and activities.

In their quest to gain collaboration among various otherwise siloed functions within an organization, safety, claims, human resources, legal, health and benefits, operations and risk management professionals may have a silver bullet in physical demands assessments (PDAs).

By their design, well-constructed PDAs can have positive and measurable impact on the continuum from hiring practices through the return-to-work process and between overlapping activities.

More importantly, PDAs can be used within an organization to support multiple objectives and activities, such as:

- Candidate hiring inquiries on essential functions
- Post-offer employment testing (POET)
- New employee and recurrent employee training
- Temporary transitional duty task identification
- Permanent restrictions and the Americans with Disability Act Amendment Act (ADAAA) interactive process
- Disability and wellness management initiatives
- Work hardening – physical and occupational therapy
- Post-incident injury analysis
- Risk-reduction strategies
- Job and task rotation

Ultimately, utilizing PDAs across the injury and safety management spectrum can improve outcomes and support initiatives that help reduce the total cost of risk (TCoR).

The implementation of an effective and sustainable PDA initiative can be structured around five key steps. The initiative begins with the creation of the PDA format and continues through a well-orchestrated process that includes evaluation using measurable goals and objectives.

**Step 1: Creating a Validated PDA**
By definition, and when properly implemented, PDAs provide a detailed description of job requirements including lifting, pushing, pulling, hand forces, posture data and repetitions, such as lifting 25 pounds approximately 40 times during a shift. Task frequencies may be rated according to general Department of Labor requirements, such as never, infrequent, occasional, etc.

Some employers also link task frequencies to corresponding limbs or body parts and describe skills needed to perform jobs safely. At the same time, the PDA should capture specific equipment in use when the tasks are being performed.

Together, all these elements are necessary to validate the job requirements, as well as to support ADAAA and Equal Employment Opportunity Commission (EEOC) compliance with actionable information in the workplace.

Step 2: Outlining Pre- and Post-Loss Initiatives

The information gathered from the PDA collection process provides the foundational basis to make the job task elements actionable and applicable to multiple departments within an organization.

Notably, they can provide a consistent framework for candidate hiring, safety training and program development, injury reduction initiatives, job rotation assignments, health and wellness programs, claims management considerations and the return-to-work process.

The process of creating a PDA gives EHS and ergonomics professionals an opportunity to break down the elements of the individual job tasks and look for additional areas of improvement. Once completed, PDAs then can be integrated into injury and illness prevention plans or ergonomics initiatives. In these situations, a detailed hazard analysis may be required to ensure the PDA also recognizes specific task needs (i.e., PPE requirements), but the foundational aspects of the job requirements are validated through the PDA data collection process.

At the same time, through the use of technology, employers can leverage information gathered during the creation of PDAs for various job functions for wider application throughout their organization. For example, they might compile a database or matrix of job tasks and create a searchable master list of tasks for use in job rotation, as well as for development or application of engineering solutions to improve task ergonomics. Additionally, the database can be accessed to determine temporary, transitional duty/return-to-work task assignments and during the ADAAA interactive process when assessing potential reasonable accommodations.

Step 3: Creating a Consistent Framework

Although an employer’s safety and ergonomics professionals may initiate the data collection process for the creation of a PDA and perform a central role in obtaining direct measurements of the actual physical demands, input should be obtained across departments to properly define and validate job task requirements for other applications within an organization. For instance, the involvement of an expanded and integrated team helps ensure all physical requirements of a job are captured so the PDA can be applied from safety and prevention through the return-to-work process and all steps in between.
Furthermore, each PDA should be reviewed thoroughly by each department within an organization to make sure it includes all associated tasks, as well as to make sure all beneficial applications for use of a PDA are recognized across the organization.

The process of validating each of the job tasks with operational supervisors and human resources also can help with an employer’s efforts to ensure concurrence within their organizational structure. Taking the process a step further, an employer can work with a certified professional ergonomist (CPE) to validate defined tasks and help facilitate compliance with ADAAA and EEOC objective validation requirements.

**Step 4: Identifying the Integrated Team and Overlap**

Safety professionals can guide and manage the PDA implementation; however, achieving the best outcomes calls for the involvement of multiple disciplines and individual departments engaged in any and all aspects of employee recruitment, management, engagement, retention, safety, health and wellness and performance.

Although the benefits of PDAs may be ubiquitous, organizational structures can present barriers to their development and deployment. It’s fairly common for organizational functions to be siloed with various departments operating independently and with different reporting lines. In most cases, core objectives and performance metrics are independent of each other.

In these situations, getting to a point where disparate functions and operations can share in the development and utilization of PDAs will require leadership support and a company-wide edict on aligning new integrated initiatives and applications. In some organizations, the starting point may be identifying and defining the overlap across departmental functions to support the integration of responsibilities. In addition, identifying the baseline performance benchmarks and establishing the key metrics to measure going forward will be instrumental for evaluating and managing the success of the PDA application.

Principal activities recommended within the initiation of a PDA implementation process include:

- Leadership edict on new initiatives and integration
- Identification of an integrated team
- Defined goals and metrics
- Establishment of baseline performance indicators
- Outline of team responsibilities and departmental overlap
- Defined communication triggers and hand-offs to the next team
- Team cross-training to manage connection points.
- Defined meeting platform and outcome-based reporting
- Secure support for continuous review and improvement.

An example of functional overlap can be seen in the safety and prevention initiatives shared by ergonomics, risk management, OSHA and regulatory compliance requirements. Similarly, an employer’s return-to-work initiatives, related temporary transitional duty process and the interactive process require close coordination with legal for successful ADAAA and EEOC compliance.
In making the internal case for collaboration, it’s worth noting that an integrated team process aligned through the use of a PDA will provide a consistent, company-wide foundation to support recognition of – and improved compliance with – OSHA, ADAAA and EEOC requirements.

Throughout the PDA implementation process and beyond, it particularly is important that each team understand the core objectives and obligations of each department: For example, safety professionals should understand the claims and injury management obligations and best practices, while claims professionals should be cognizant of OSHA compliance and injury prevention strategies. Key objectives may encompass such areas as the following:

- **Safety**: Injury prevention, best practices and regulatory compliance.
- **Claims**: Compensability decisions, claim management and the return-to-work process.
- **Operations**: Productivity, job procedures and SOPs.
- **Human Resources**: Benefit coordination, employment status, Family Medical Leave Act (FMLA) and leave-of-absence eligibility.
- **Finance**: Fiduciary impact and budgetary considerations.
- **Insurance**: Coverage, underwriting and marketability.
- **Risk Management**: Overall impact to the organization insurance program and the total cost of risk (TCoR).

In making a case for integration and the use of a PDA-based program, it is important to note that one PDA contains the most-relevant job-related physical task requirements in comparison to job descriptions, ergonomic assessment forms and job hazard analysis forms. While multiple forms often are maintained and managed by different departments and staff, one PDA contains the relevant information needed for multiple applications. This can improve efficiencies, streamline utilization and reduce the likelihood of conflicting information as all departments work from the same PDA document.

**Step 5: Defining Measurable Goals and Metrics**

PDAs can have a positive and measurable impact on several critical functions across an organization, from the continuum of candidate hiring through the safety and prevention application and the return-to-work process. Consequently, to support the effectiveness of the application, clear performance measurements should be established.

To assess the integrated strategic application, plans should have measurable goals, defined activities and performance metrics.

SMART (strategic, measurable, attainable, relevant, timely) goals should consider frequency, severity, leading and lagging. Leading indicators include activities such as meeting attendance, post-injury analysis report completion, corrective action completion and training and SOP refresh. Lagging indicators examine results, such as lag time, frequency, number of claims and injury rates, severity of claims (claims cost, number lost time injuries/days lost), claim descriptions (the type or cause of claims that are occurring) and body parts descriptions (the body part that was injured).

On a post-loss basis, PDAs play a significant role in the development of task identification in a temporary transitional-duty program by expediting the return-to-work process and alignment of transitional work, which
can result in significant and measurable savings for employers. Results often are seen through decreased indemnity costs, decreased legal expense or litigation and reduced medical costs.

The PDAs also can be used to educate medical providers on the objective task requirements of the pre-injury position and during the temporary transitional duty process. PDAs provide a validated framework to review with a medical provider when encountering barriers with the completion of a workability form and obtaining a release to return to temporary transitional duty. The form, which accompanies the employee to each medical appointment, documents permanent restrictions for engagement in the interactive process and potential reasonable accommodations.

In these cases, it’s preferable for a physician to provide a completed workability form so the employer then can determine which task assignments are available. However, when a physician is reluctant to release an employee to temporary transitional duty, the PDA can provide the objective information needed for a physician to reconsider the off-work status.

In addition, PDAs can be utilized when navigating the ADAAA interactive process. The PDA can be invaluable as an objective document to illustrate task requirements and guide the potential reasonable accommodations discussion process when permanent restrictions or a disability is presented.

A coordinated safety and injury management process utilizing properly designed PDAs can provide a foundation to facilitate inter-departmental collaboration and measurable improvements in employee safety, operational risk reduction and ADAAA, OSHA and EEOC compliance.

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