

# Reclamation Manual

## Directives and Standards

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**Subject:** Qualification Requirements (Medical)

**Purpose:** Clarifies Reclamation procedures concerning medical qualification determinations and mandatory physical examinations for placement.

**Authority:** Title 5 CFR 339 Medical Qualification Determinations; Title 5 CFR 293, Subpart E, Employee File System Records; 370 DM 339, Qualifications Requirements (Medical); Office of Personnel Management Operating Manual, Qualifications Standards for General Schedule Positions; and DOI Occupational Medicine Program Handbook

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1. **Objective.** Pre-placement medical evaluations will be used to assess an individual's physical qualifications before assignment to a position with established medical standards or physical requirements to ensure they are physically qualified to perform essential duties of the position without endangering the health and safety of themselves or others.
2. **Definitions.** Additional definitions and responsibilities are published in the Occupational Medicine Program Handbook: <http://medical.smis.doi.gov/handbook.smis.doi.gov.html>.
  - A. **Medical Standard.** Qualification standard set by OPM (or an agency if it has more than 50% of the positions in that occupation Government wide) that identifies certain medical conditions that would be disqualifying because there is a direct relationship between the condition and the essential duties of the specific positions to be filled. A medical standard means that a particular medical condition, by its very nature, is disqualifying in **all** cases because no individual with this condition would be presumed to be able to successfully perform the duties of the position without undue hazard to himself/herself or others. Example: persons who are blind in both eyes are excluded, without an individual evaluation, from eligibility for a license to operate a Government vehicle.
  - B. **Physical Requirement** is established by an agency to describe specific **activities** that an employee must be able to do in order to accomplish the duties of the position. Example: firefighters may require the ability to climb ladders; materials handler positions would likely include a requirement that employee be capable of lifting a certain weight.
  - C. **Pre-placement Medical Evaluations** are to assess an individual's health status before assignment to a position with physical qualification standards. The purpose of the evaluation is to ascertain whether the individual has any health condition that prevents him/her from performing the job, including the ability to wear protective equipment (e.g., a respirator) required for the job. Evaluation should also identify any health

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problems that could be substantially aggravated and/or accelerated by the anticipated physical demands and working conditions of the job.

- D. **Arduous or Hazardous Positions** means positions that are dangerous or physically demanding to such a degree that an incumbent's medical condition is necessarily an important consideration in determining ability to perform safely and efficiently.
- E. **Review of Medical Documentation** means assessment of medical documentation by, or in coordination with, a physician to ensure that the following criteria are met:
  - (1) The diagnosis or clinical impression is justified in accordance with established diagnostic criteria, and
  - (2) The conclusions and recommendations are not inconsistent with generally accepted medical principles and practices.

### 3. Responsibilities.

- A. **Servicing Personnel Offices** must ensure that employees in arduous and/or hazardous occupations are medically fit and physically capable of performing their duties without undue risk to themselves or others based upon written documentation provided by the examining licensed physician or practitioner.
- B. **Employing Offices** must modify the stated job requirements or the physical surroundings of the work environment to allow a disabled employee to perform the essential functions of a job, as long as these accommodations do not present an undue hardship for the employer (e.g., they are not excessively expensive or create a significant difficulty for the employer).
- C. **Office Requiring the Examination** will pay for all medical examinations ordered or offered, whether conducted by the agency's physician or the applicant's physician.
- D. **Supervisors** must ensure position descriptions and accompanying job analyses document physical requirements for positions when such requirements are considered essential for successful job performance. Technical assistance may be provided by the servicing personnel office or safety office as requested.
- E. **Applicant** will be required to cooperate, participate, and comply with the portions of the medical evaluation program that apply to the applicant's position or known exposures, providing complete and accurate information as requested.
- F. **Examining physician/clinic** will complete appropriate portions of the Certificate of Medical Examination, or similar form provided, to document physical findings.

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Medical documentation must be provided by a licensed physician or other appropriate **practitioner** (person providing health services who is not a medical doctor, but who is certified by a national organization and licensed by a State to provide the service in question).

#### 4. Scope.

- A. Appendix A identifies positions in the General Schedule (GS) for which OPM has established medical standards (see also OPM Qualification Standards Operating Manual, Section VI B). Physical requirements for positions in the Federal Wage System are published in the Federal Wage System Job Grading Standards for individual occupations published by OPM.
- B. As authorized by 5 CFR 339.203, Reclamation will establish physical requirements for additional individual positions when such requirements are considered essential for successful job performance. Physical requirements will be based on the arduous or hazardous nature of duties typically performed as documented in the position description or statement of duties. Documentation on specific physical requirements of the duties performed may be included in the job description or in a supporting job analysis included as an attachment to the job description. (Sample job analysis provided as Appendix B.) Failure to meet an established medical standard or physical requirement means that the individual is not qualified for the position unless there is sufficient evidence that he/she can perform the duties of the position safely and efficiently despite a condition that would normally be disqualifying. In some instances, a physical impairment will not disqualify an applicant if the condition is compensated for by a satisfactory prosthesis, mechanical aid, or by reasonable accommodation.
- C. Appendix C lists occupations for which physical requirements are typically established within Reclamation; however, individual positions may vary; therefore it cannot be assumed that all such positions are subject to established physical qualification standards unless such requirements are documented in the position description or statement of duties. Absent a listing of specific positions identified at the local or regional level, Appendix C will serve as a guide for physical requirements established for occupations within Reclamation.
- D. GS positions with sedentary, light or moderately active duties are covered by the medical standards published by the Office of Personnel Management, Operating Manual for Qualification Standards for General Schedule Positions, Section VI, Medical Requirements at <http://www.opm.gov/qualifications/sec-vi/sec-vi.htm>. Routine preappointment examinations are appropriate only for positions which have additional specific medical standards or physical requirements (5 CFR 339.301). Requirements for medical examination for sedentary, light, or moderately active duty positions are waived when there is sufficient documented evidence that an applicant,

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with or without reasonable accommodation can perform essential duties of the position without endangering the health and safety of the individual or others. Use of SF 177, Statement of Physical Ability for Light Duty Work, or similar form may be used at the discretion of the servicing personnel office to document such a determination.

### 5. Procedures.

- A. Selections for positions requiring physical examinations based upon medical standards identified by OPM or physical requirements established by Reclamation, will be subject to pre-placement medical examinations at government expense to ensure selectees are physically qualified to perform essential duties of the position without endangering the health and safety of themselves or others using the following procedures:
- (1) Position description or statement of duties (and job analysis if used as a supplement to the position description) prepared by supervisor will document physical requirements or medical standards which serve as the basis for the medical examination. Technical assistance may be provided by servicing personnel office and/or safety office as necessary.
  - (2) Reclamation will pay for all required medical examinations, and will inform the applicant in writing of the reasons for the examination and the consequences of failure to cooperate. Notification required under this paragraph must be made prior to a firm commitment of employment or placement in a position where duties document the need for the required physical exam.
  - (3) Certificate of Medical Examination, SF 78, Part B, or similar form, will be completed by the servicing personnel office, or as delegated locally, to identify physical requirements essential to perform duties in the position (see Appendix D for example). A copy of the position description or statement of duties will be attached to the request for medical examination which will be sent to the examining physician. The examining physician or practitioner will be requested to determine specific medical tests required and document medical findings in the appropriate blocks on the form and return the completed form to the servicing personnel office using a self-addressed return envelope which has been marked "Medical information - confidential/privileged." (DOI Occupational Medicine Program Handbook should be used as a reference in determining specific tests to be conducted. Any follow-up tests deemed necessary due to specific health factors of the employee not directly related to employment will be the responsibility of the employee).
  - (4) Results of the medical evaluation will be reviewed by or coordinated with a Medical Review Officer when non-routine medical findings indicate potential

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concerns. Services can be arranged for individually by regional or local agency management, or Reclamation may make arrangements for such reviews through the Department of Interior Occupational Health Program Manager.

- (5) If the medical findings indicate limits should be placed on an employee's physical activities which will impact the work or performance, the supervisor must decide if he/she can accommodate those limitations. For limitations of a temporary nature, light duties may be assigned for a limited time. If there is no accommodation available and the applicant cannot perform the major functions of the job, they do not meet established standards for the position and may not be placed in that position. The applicant's rights under applicable laws and/or regulations, must be protected, and the applicant counseled concerning the alternatives available. Employees who are covered by a bargaining unit may have rights under a collective bargaining agreement and should consult their local union representative.
- (6) DOI's Occupational Health Programs Office should be consulted when:
  - (a) An applicant requests reconsideration or disagrees with the results or recommendations of a medical examination,
  - (b) Medical Reviewing Officer is uncertain about the limitations or prognosis of the individual's condition, or
  - (c) If there is a disagreement about the condition or placement recommendation.
6. **Employee Medical Records.** Human Resources Offices will maintain and manage employee medical records in accordance with 5 CFR Part 293, Subpart E, Employee Medical File System Records. All medical confidential information will be handled in accordance with the Privacy Act of 1974. Routine uses allowed for employee medical file records are provided in Appendix E.
7. **Discretionary Services.** Some occupational health services are provided as a result of specific federal regulations, union/management-negotiated contract provisions or policies and directives. Such discretionary services may include for example, periodic health exams, routine occupational health center services and health promotion, health services related to provisions of union contracts, etc. Any discretionary services provided are in addition to, and not to be confused with nondiscretionary processes such as pre-placement examinations that are mandated by regulation.