

**FEDERAL INTERAGENCY  
WILDLAND FIREFIGHTER  
MEDICAL QUALIFICATION  
STANDARDS**

**INTRODUCTION**

## **Introduction**

The Federal Fire and Aviation Leadership Council authorized an interagency team to address a common perception that the present physical examination processes for employees who participate in arduous wildland fire fighting duties are not adequate.

The team underwent basic firefighter training, gathered information on the present procedures involved with physical examinations, reviewed relevant studies, interviewed fire managers and firefighters (both in an office setting and on the fire line) and discussed their findings.

It was the consensus of the team that the current physical examination process is inadequate for the intended purpose of reasonably assuring a level of employee health necessary so that the employee will not be at unnecessary risk, or put others at risk, in performing arduous duties associated with firefighting. There were very real questions concerning whether the physician was given enough information to make a medically sound judgement of whether the individual being examined could safely perform the duties required by these positions. There was also the question of what relevant health factors should be assessed and what was the most effective and economic method of assessment.

## **Medical Standards Programs and Practices**

The publication of the Interagency Medical Standards Team final document on August 7, 2000 established the medical standards program and practices. Since the Federal Interagency Wildland Firefighter Medical Standards Program implementation in FY02, several changes occurred. For FY04, BIA is 100% implemented; BLM/FWS/NPS are implemented in the geographic Southwest, Northwest, Alaska, California, and Hawaii; FS is implemented at seven co-located BLM/FS offices in Oregon.

The practices used by the five wildland firefighting agencies as of August 2000, and in areas not yet reached by the implementation schedule, vary widely, none of these practices are viewed as acceptable either from a good medical practice standpoint, nor from a potential legal standpoint considering changes in federal disability employment regulations brought about by the Rehabilitation Act of 1973 (Public Law 93-112).

At present, Department of the Interior land management agencies use a variety of government forms and provide varying levels of information to examining physicians in connection with firefighter physicals for present and prospective employees.

Information and forms provided by these agencies include:

### **BUREAU OF INDIAN AFFAIRS**

Standard Form No. 78, Certificate of Medical Examination

- Appendix A-#6 **STATEMENT OF PHYSICAL ABILITY FOR ARDUOUS/HEAVY PHYSICAL WORK**

- 53 BIAM(manual) SUPPLEMENT 8, FOREST AND RANGE MANAGEMENT, Fire Management Operations

## FISH AND WILDLIFE SERVICE

- Standard Form No. 78, Certificate of Medical Examination
- Form 1400-108, Physical Requirements for Firefighters and Smoke jumper Positions
- Explanatory material (pages 1.5-17 through 1.5-20) from the Fire Management Handbook.

## BUREAU OF LAND MANAGEMENT

- Standard Form No. 78, Certificate of Medical Examination
- Form 1400-108, Physical Requirements for Firefighters and Smoke jumper Positions
- SPECIFIC INSTRUCTIONS TO PHYSICIAN

## NATIONAL PARK SERVICE

- Standard Form No. 78, Certificate of Medical Examination
- Physician Response Memo
- PERSONAL HEALTH HISTORY QUESTIONNAIRE
- PHYSICAL EXAMINATION POLICY AND PROCEDURES
- Instruction letter to physician
- PRE-APPOINTMENT PHYSICAL EXAM REIMBURSEMENT VOUCHER

Once an examination is completed, the common practice is for the examination results to be forwarded to the Servicing Personnel Office of the employing agency. The Servicing Personnel Office reviews the Standard Form 78 to determine whether the examining physician has marked, in the conclusions block, either “No limiting conditions for this job” or “Limiting conditions as follows:” If “No limiting conditions for this job” is marked, the individual is either hired, or, in the case of a present federal employee, is allowed to participate in arduous duties. If “Limiting conditions as follows:” is marked, the Servicing Personnel Office meets with agency management to determine whether a reasonable accommodation can be made.

## U. S. FOREST SERVICE

The U. S. Forest Service currently has not initiated a medical review/medical clearance program for firefighters.

Perceived problems with the current practices include:

- Lack of consistency among agency programs even though wildland firefighters from different agencies frequently perform the same duties side by side.
- Lack of a formal documented waiver/accommodation process for firefighters who do not meet medical standards.
- Lack of a comprehensive medical history as part of the examination process.
- Examination form(s) which are inconsistent with needed elements of the examination.

# Federal Interagency Medical Qualification Standards Program

## Highlights

The medical qualification program presents several significant departures from current agency practice. These changes include:

### Personnel Required to Administer the Program

**Servicing Personnel Office(r) (SPO)** - The servicing personnel office(r) is responsible for providing appropriate medical forms to GS/WG seasonal temporary position and permanent position applicants.

**Fire Management Office(r) (FMO)** – The fire management office(r) is responsible for providing appropriate medical forms to incumbent personnel; and AD/EFF firefighters over 45 years of age.

**Central Medical Consultant (CMC)** - A central medical consultant is needed to provide medical interpretation of the findings of medical examinations, medical histories, provide quality assurance/quality control on medical documents, and provide medical clearance determinations on the baseline, periodic, and exit examinations. This CMC should be a licensed medical care provider, with experience in occupational health and wildland firefighting. Training may be required in recognition of the medical conditions that may represent a substantial risk of harm in the performance of arduous wildland firefighting duties.

**Medical Review Officer (MRO)** - The Interagency Wildland Firefighter Medical Qualification Program includes the formal designation of a Medical Review Officer who can interpret adverse medical findings using actual knowledge of the condition under which wildland firefighters duties are performed. The designation of an MRO may be done on an agency or interagency basis, depending upon specific needs. The MRO must be familiar with wildland firefighter operations in order to render expert opinions relating to medical fitness. While the examining physician may see one or a few firefighters and can reasonably render a fitness determination when there are no potentially disqualifying medical conditions, the MRO will see and render a consistent medical recommendation on all firefighters who have any medical condition that may (or may not) be disqualifying. The examining person will be licensed to conduct physical examinations and familiar with general physical examination procedures while the MRO will be a board certified or board eligible occupational medicine physician with intimate knowledge of the conditions of employment.

**Program Manager** - The Interagency Wildland Firefighter Medical Qualification Standards program includes the formal designation of an overall Program Manager who will provide tracking and continuity to the second level review process. This individual will track and review incoming medical files for completeness, and control the flow of medical files to the MRO. This individual should have a background in wildland firefighting and expertise in safety. Ideally the Program Manager will be a member of the Interagency Medical Review Board. This position is a full time responsibility.

**Interagency Medical Review Board** - The Interagency Wildland Firefighter Medical Qualification Standards program includes the formal designation of an overall Interagency Medical Review Board (IMRB) that will provide a variety of professional expertise to the second level review process. The Board members will ideally come from a variety of backgrounds including occupational safety, occupational medicine, wildland firefighting safety, management, union, human resources, etc. The board will take medical review findings from the MRO and determine, with input from the SPO and local management, whether any waiver or accommodation is pertinent to the individual case. The IMRB will consider the specific details of each second level review on a case by case basis, providing continuity to the overall program.

**Timing (See next page for a quick reference chart)**

Incumbents or Applicants for permanent positions Less Than 45 Years Old

A medical history and physical examination are to be conducted and the “Medical History, Examination, and Clearance Form” completed **every five years**. In those years in which an exam is not scheduled, an “Annual Medical History and Clearance Form” is to be completed by the firefighter. Every year, therefore, the appropriate form is to be completed and reviewed prior to scheduling an arduous duty performance test (currently the ‘pack test’.)

Incumbents or Applicants 45 Years Old or Greater

A medical history and physical examination are to be conducted and the “Medical History, Examination, and Clearance Form” completed **every three years**. In those years in which an exam is not scheduled, an “Annual Medical History and Clearance Form” is to be completed by the firefighter. Every year, therefore, the appropriate form is to be completed and reviewed prior to scheduling an arduous duty performance test (currently the “pack test”).

There are factors that may make a conventional medical examination impractical. The lack of adequate medical services, the distance from the employee residence to appropriate medical facilities, time sensitive hiring processes (especially during periods of “fire emergencies”), all create situations where the agencies may need to gather medical information within a very limited timeframe. In these situations, the “Annual Medical History and Clearance Form” may be used prior to scheduling an arduous duty performance test. Agencies may individually or collectively agree upon the terms and conditions of the use of this method. The Medical Standards Team cannot recommend the “Annual Medical History and Clearance Form” as a substitute for a scheduled medical examination/interim medical history program, but recognizing the logistics of hiring numerous firefighters in compressed timeframes and under difficult logistical circumstances, we feel that this form is the closest to a comparable substitute that we can provide.

## MEDICAL STANDARDS EVALUATION PROCESS

### QUICK REFERENCE CHART

<b>MEDICAL STANDARDS EVALUATION PROCESS</b>  <b>The following chart is presented to summarize the requirements for firefighters who perform in arduous firefighter situations.</b>	Incumbent/ Applicant (permanent positions) < 45 years of age	Incumbent/ Applicant (permanent positions) ≥ 45 years of age	GS/WG Seasonal Temporary positions < 45 years of age	GS/WG Seasonal Temporary positions ≥ 45 years of age	AD/EFF < 45 years of age	AD/EFF ≥ 45 years of age
<b>Medical                      Clearance/Surveillance                      Examination (<i>Baseline</i>)</b>	<b>Yes - initial</b>	<b>Yes - initial</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
<b>Medical                      Clearance/Surveillance                      Examination (<i>Periodic</i>)</b>	<b>Every 5 yrs</b>	<b>Every 3 yrs</b>	<b>No</b>	<b>Yes -                      initial</b>	<b>No</b>	<b>No</b>
<b>Annual Medical History                      and Screening                      (given on years that no                      examination is scheduled)</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>	<b>Yes, at                      FMO                      discretion                      when                      indicated                      by the                      HSQ*</b>	<b>Yes</b>
<b>Medical                      Clearance/Surveillance                      Examination                      (<i>Exit</i>)</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

\* - The HSQ is not part of the Interagency Wildland Firefighter Medical Standards Program.

## **Medical Standards**

Medical standards were developed and validated by on-site visits to wildland and prescribed fire operations. The written and validated medical standards, including the medical examination elements, are shown in the medical standards section. These standards include the statement of medical fitness for the physiological element as well as a list of potentially disqualifying factors for use by the examining physician/CMC/MRO. Please note that the medical standard is a technical document designed for use by a medical provider and is subject to a case-by-case individualized assessment. The sample conditions listed in the individual standards should not be considered as automatic disqualifications but rather as typical conditions that may be of concern to the medical professional for safety or efficient job performance reasons.

## **Medical Examination and Forms**

A consistent set of medical examination criteria, a medical examination form, and an annual medical history and clearance form were developed to provide uniform tools for agencies to use in the administration of the medical program. This allows for the comprehensive collection of medical data important to the determination of medical fitness for firefighter duties.

**Baseline Exam:** The baseline (or initial) exam is focused on the medical requirements to perform arduous firefighter duties and is more comprehensive than the periodic exams to allow for the collection of adequate data.

**Periodic Exam:** A focused periodic medical examination is to be conducted every five years on firefighters until they reach the 45 years of age. At age 45, the periodic medical examination is to be conducted every 3 years.

**Exit Exam:** The exit exam is performed when an incumbent terminates federal service as an arduous duty wildland firefighter.

**Baseline/Periodic/Exit Medical Examination Form:** The “Federal Interagency Medical History, Examination and Clearance” form is used, with some differences, for baseline, periodic, and exit medical examinations. The shaded area of the medical examination form is filled out by the firefighter prior to, or at the time of, the examination. The examining physician completes the medical information sections, standards review, and clearance sheet during the course of the medical examination. After receipt of the blood and other test data, the examining physician forwards the completed medical examination form to the agency designated location for review.

Examination forms (Baseline/Periodic) revealing abnormal or suspect medical conditions will be forwarded to the CMC/MRO for further review and a medical fitness determination.

**Annual Medical History and Clearance Form:** An obligatory annual medical history questionnaire is required of firefighters in those years when an actual medical examination is not scheduled. This “Federal Interagency Annual Medical History and Clearance” form will be reviewed by a physician or an allied medical care provider (e.g.

registered nurse, nurse practitioner, or physician's assistant). The form is then submitted to the agency designated location for review and storage.

## **Qualification Review Process**

The medical documents are reviewed in order for management to make a medical qualification decision. The medical qualification decision process is the same for all arduous duty wildland firefighters enrolled in the program. However, there are factors that may make a conventional medical examination impractical (i.e. lack of availability of medical services, the distance from the employee residence to appropriate medical facilities, time-sensitive hiring processes, etc.).

## **Baseline Examination**

Applicants for permanent positions and incumbent arduous duty wildland firefighters will receive a medical examination and clearance by an agency funded health care professional familiar with physical examination procedures and licensed to conduct a physical examination. This examination is mandatory. The examination will be completed and reviewed before the employee can perform arduous wildland firefighting duties. In the event that arduous wildland firefighting is a job requirement (e.g. essential job function) and the individual is a new hire, then the medical examination and clearance must be completed and reviewed after a formal job offer is tendered, but before the individual is hired. When the results of the examination are received, there is an initial decision point resulting in a "GO - NO GO".

**Initial "GO" Decision** - A "GO" decision means the individual is medically qualified, and they proceed to the next step in the process, usually the agency administered "work capacity test" and then into mandatory training and ultimately into unrestricted duty as an arduous duty wildland firefighter.

**Initial "NO GO" Decision** - In those limited situations where an applicant/incumbent has a medical condition that may preclude safe and efficient job performance, a second level of review may be used, depending upon employment status or past experience, to consider the specific aspects of the applicant's medical condition and the need for follow-up information from the applicant's medical care provider(s). The FMO/SPO may utilize the services of the Central Medical Consultant (CMC) to interpret the results of a medical examination where a NO GO determination is initially made. The CMC may request that the applicant/employee provide additional information from their personal physician (at the applicant's/employee's expense) to put the medical condition in perspective with the expected conditions of employment. The CMC will then make a second level review medical determination concerning clearance for arduous wildland firefighting duties and report the findings of this review to the FMO/SPO and Program Manager. For incumbents, if clearance is not granted, the Interagency Medical Review Board (IMRB) process is initiated. This level of review is initiated by the CMC/FMO/SPO coordinating with the Program Manager. The CMC will send the results of the medical examination to the Program Manager. The Program Manager may, in turn, review the materials for completeness and forward the case to the Medical Review Officer (MRO) for review and recommendations. Either or both the CMC and MRO will prepare a summary of medical findings and recommendations which will be evaluated through the IMRB process in determining whether any waiver, waiver with restriction(s), or waiver with reasonable



accommodation is feasible for the position in question. If no waiver or accommodation can be made that is consistent with safe and efficient job performance, then the individual is not medically qualified to perform as an arduous duty wildland firefighter. In the case of an applicant for a position, temporary or permanent, the agency is under no legal mandate to waive/accommodate the medical qualification standards program. At agency discretion, applicants not meeting the medical qualification standards may be reviewed on a case by case basis. An applicant may submit additional information in an effort to become cleared for duty in the following season, or in a later season during that year.

## **Periodic Medical Examination**

Incumbent arduous duty wildland firefighters will receive a periodic medical examination and clearance by an agency funded health care professional familiar with physical examination procedures and licensed to conduct a physical examination **every five (5) years, until the age of 45, and thereafter every three (3) years.** This examination is mandatory. The examination will be completed and reviewed before the employee can perform arduous wildland firefighting duties. When the results of the examination are reviewed, there is an initial decision point resulting in a "GO - NO GO".

**Initial "GO" Decision** - A "GO" decision means the individual is medically qualified, and they proceed to the next step in the qualification process, usually the agency administered "work capacity test" and then into unrestricted duty as an arduous duty wildland firefighter.

**Initial "NO GO" Decision** - In those limited situations where an applicant/employee has a medical condition that may preclude safe and efficient job performance, a second level of review will be used to consider the specific aspects of the applicant's medical condition and the need for follow-up information from the applicant's medical care provider(s). The FMO/SPO may utilize the services of the Central Medical Consultant (CMC) to interpret the results of a medical examination where a NO GO determination is initially made. The CMC will review the examination or history to determine whether the medical condition identified during the examination or disclosed in the medical questionnaire is significant enough to warrant a second level of review. The CMC may request that the applicant/employee provide additional information from their personal physician (at the applicant's/employee's expense) in order put the medical condition in perspective with the expected conditions of employment. The CMC will then make a second level review medical determination concerning clearance for arduous wildland firefighting duties and report the findings of this review to the FMO/SPO and Program Manager. If clearance is not granted, the Interagency Medical Review Board (IMRB) process is initiated. This level of review is initiated by the CMC/FMO/SPO coordinating with the Program Manager. The CMC will send the results of the medical examination to the Program Manager. The Program Manager would, in turn, review the materials for completeness and may forward the case to the Medical Review Officer (MRO) for review and recommendations. The CMC/MRO will prepare a summary of medical findings and recommendations which will be evaluated through the IMRB process in determining whether any waiver, waiver with restriction(s), or waiver with reasonable accommodation is feasible for the position in question. If no waiver or accommodation can be made that is consistent with safe and efficient job performance, then the individual

is not medically qualified to perform as an arduous duty wildland firefighter.

### **Annual Medical History and Screening**

In those years in which an examination is not scheduled, an “Annual Medical History and Clearance Form” is to be completed by the firefighter. In addition, a specified medical screening is to be performed and recorded by a health care professional. Any licensed or certified health care professional may perform the screening as long as the scope of practice delineated by their license or certification includes the required screening functions. This annual medical history and screen is mandatory. The annual medical history and screen must be completed and reviewed before the employee can perform arduous wildland firefighting duties. At the completion of the medical history review and screening by the local health care professional (LHCP), there is an initial decision point resulting in a "GO - NO GO".

**Initial "GO" Decision** - A "GO" decision by the LHCP means the individual is medically qualified, and they proceed to the next step in the qualification process, usually the agency administered "work capacity test" and then into unrestricted duty as an arduous wildland firefighter.

**Initial "NO GO" Decision** - In those limited situations where an applicant/employee has a medical condition that may preclude safe and efficient job performance, depending upon employment status, a second level of review may be used to consider the specific aspects of the applicant's medical condition and the need for follow-up information from the applicant's medical care provider (s).

**For Incumbents:** The FMO will utilize the services of the Central Medical Consultant (CMC) to interpret the results of a medical examination where a NO GO determination is initially made. The CMC will review the examination or history to determine whether the medical condition identified during the examination or disclosed in the medical questionnaire is significant enough to warrant a second level of review. The CMC may request that the applicant/employee provide additional information from their personal physician (at the applicant's/employee's expense) in order put the medical condition in perspective with the expected conditions of employment. The CMC will then make a second level review medical determination concerning clearance for arduous wildland firefighting duties and report the findings of this review to the FMO and Program Manager. If clearance is not granted, the Interagency Medical Review Board (IMRB) process is initiated. This level of review is initiated by the CMC/FMO coordinating with the Program Manager. The CMC will send the results of the medical examination to the Program Manager. The Program Manager may, in turn, review the materials for completeness and forward the case to the Medical Review Officer (MRO) for review and recommendations. The CMC/MRO will prepare a summary of medical findings and recommendations which will be evaluated through the IMRB process in determining whether any waiver, waiver with restriction(s), or waiver with reasonable accommodation is feasible for the position in question. If no waiver or accommodation can be made that is consistent with safe and efficient job performance, then the individual is not medically qualified to perform as an arduous duty wildland firefighter.

**For Applicants:** The applicant is responsible for providing additional medical information from their personal physician to the Central Medical Consultant. If additional medical information is provided, The CMC will review the examination or history to determine whether the medical condition identified during the examination or disclosed in the medical questionnaire is significant enough to warrant a second level of review. The CMC may request that the applicant/employee provide additional information from their personal physician (at the applicant's expense) in order put the medical condition in perspective with the expected conditions of employment. The CMC will then make a second level review medical determination concerning clearance for arduous wildland firefighting duties and report the findings of this review to the FMO and Program Manager.

In the case of an applicant for a position as a temporary employee the agency will probably withdraw the job offer, as the time required to complete the medical review will preclude the applicant from participating in the current year's program. An applicant may submit additional information in an effort to become cleared for duty in the following season, or in a later season during that year.

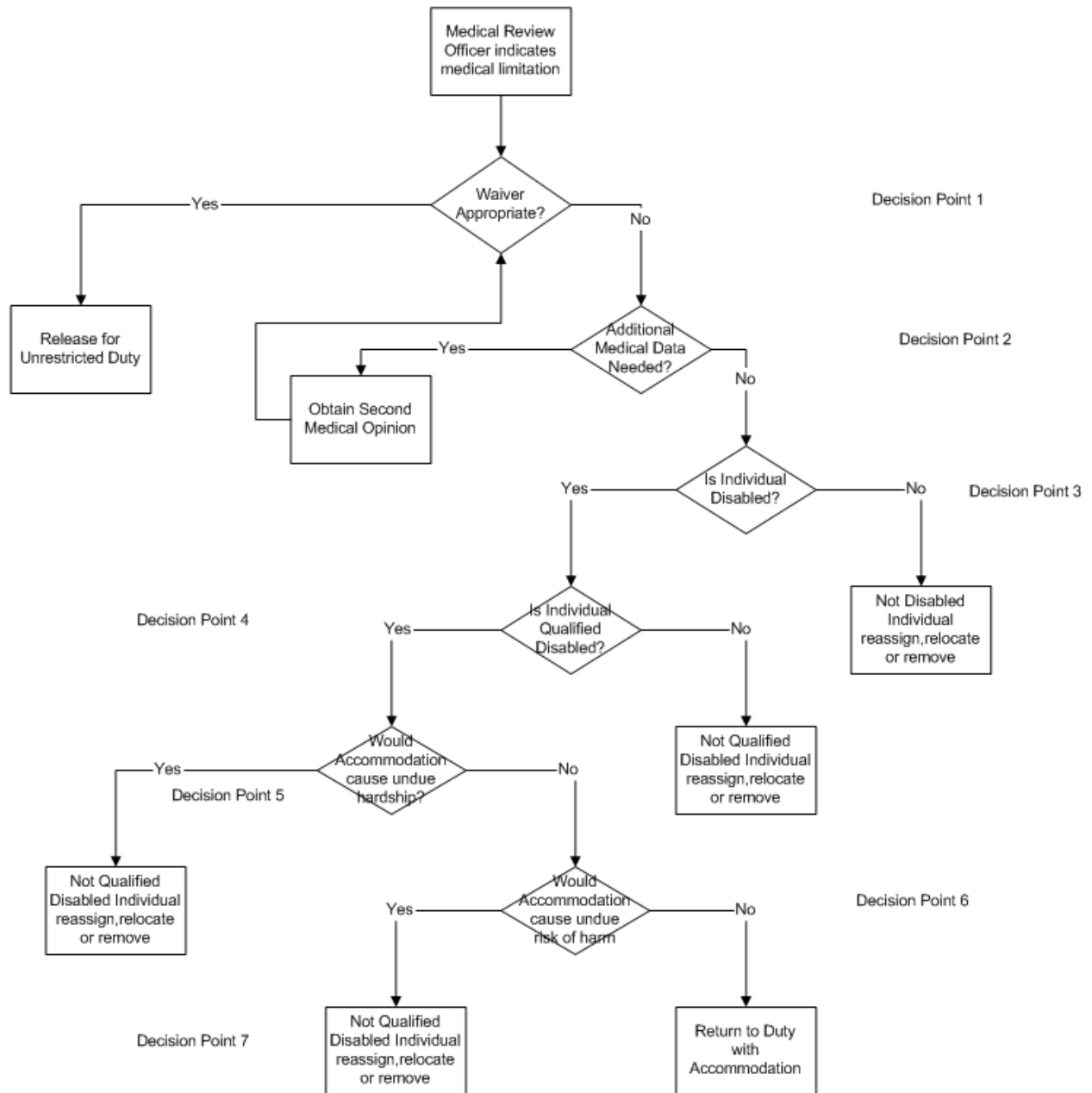
**Administrative procedures** - The medical examination program uses, minimally, a two-tiered approach to the medical process. The first tier is the medical examination and clearance; a firefighter receives a medical examination by a qualified medical provider according to a specific preset examination protocol. This examination includes an initial assessment of medical fitness by the examining physician. In cases where the examining physician questions the medical fitness of the firefighter to perform the full range of duties of the position, the case is referred to a CMC and/or MRO for a second tier review. The CMC/MRO then renders a recommendation relating to the medical fitness of the firefighter. All pertinent information is provided to the CMC/MRO to allow meaningful recommendations to be made, including but not limited to: the medical history, the results of the physical exam, a description of critical job duties, potential exposures, and any information about known exposures. In addition, the CMC/MRO should be told of any occupational illnesses which could affect the screening of individual workers. The CMC/MRO may request supplementary information from the individual's personal care physician.

The most important characteristic of the two-tiered medical approach is that the examining physician concentrates on the patient examination and initial assessment of medical fitness, and the CMC/MRO concentrates on the relationship between the medical data provided by the examining physician and the known characteristics of the job.

**Waiver/Accommodation Procedures** - This program delineates a formal administrative procedure, consistent with the requirements of the Rehabilitation Act of 1973 as amended, for agencies to use when an individual fails to qualify medically for the position of arduous duty wildland firefighter. This procedure includes the consideration of medical waivers and reasonable accommodation. If the examining physician indicates that there is a potential disqualifying medical condition, and the CMC/MRO substantiates this potential disqualification, then the Waiver/Accommodation procedure shall be used in a fair and consistent manner to

guide management in the disposition of the case. A flowchart delineating the steps and decision points for the Waiver/Accommodation process is provided on page 13. A narrative discussion of the decision points is also provided beginning on page 14.

# Waiver/Accommodation Flowchart



## **Waiver/Accommodation Flowchart Narrative**

**Decision Point One - Waivers.** Can the employee perform the essential functions of their position without accommodation and without endangering the safety or health of themselves or others?

The agency must waive a medical standard if an employee has consistently demonstrated the ability to perform his/her job in a satisfactory manner without an undue risk of harm to themselves or others. If a waiver is recommended by the Interagency Medical Review Board (IMRB) and granted by management, then the employee can return to work without restriction. Waivers are good only until the next examination or when other evidence arises indicating that the condition has changed.

**Decision Point Two - Additional Medical Opinions.** Is there a disagreement on the nature of the medical condition or diagnosis and its effect on the employee's capability?

If an employee fails to meet the medical qualification requirements, is not granted a waiver, and has a personal (non-occupationally induced) medical condition, an employee may obtain at their option another examination by a physician of choice at the employee's expense. If the medical condition is occupationally related then the medical examination, limited to the area of disqualification, will be paid for by the agency and will be conducted on official time. If there is still a disagreement about the condition, a third physician (acceptable to both the agency and the applicant or employee) will be consulted. Medical information provided by an employee's physician of choice, at the employee's own expense will be appropriately considered by the IMRB as it develops recommendations to management. The employee will be allowed at least 30 days from the notice of failure to meet the physical qualifications, to provide this information to the agency.

**Decision Point Three - Disability Determination.** Does the medical condition result in an impairment of a major life function (including work)?

The Rehabilitation Act of 1973, as amended, prohibits employment discrimination against people with disabilities, and requires employers to hire (and retain) employees who, with or without the disability, would otherwise be qualified for the job. In doing so, the employer is required to provide "reasonable accommodation" to employees with disabilities. The first determination to be made in considering accommodation of the potentially medically disqualified employee is whether the medical condition is disabling. To make this determination, management must decide, with input from the IMRB, whether the condition results in an impairment of a major life function (including work). In the case of the major life function of working, management must determine if the potentially disabled employee is substantially restricted from working in either a class of jobs or a broad range of jobs in various classes compared to the average person in a comparable situation. If management determines that an individual is not disabled then the agency is under no obligation to accommodate the employee.

**Decision Point Four - Qualified Disability Determination.** Can the individual perform the essential functions of the job with or without accommodation?

If the potentially disqualified employee is considered disabled in the previous determination, then it is their responsibility to suggest an accommodation(s) to management that will allow the employee to perform the essential functions of their position. If there are no accommodation(s) suggested by the employee, then the employee cannot perform the essential functions of their position with or without accommodation and the agency is under no obligation to accommodate the employee. It is important for the agency and employee to engage in dialog so that all possible avenues of accommodation can be evaluated.

**Decision Point Five - Undue Hardship Determination.** Would accommodation cause undue hardship for the agency?

If the potentially disqualified employee has suggested an accommodation that would allow them to perform the essential functions of their position, management must determine whether this accommodation would cause undue hardship to the agency. This undue hardship could be in the form of excess or unaffordable cost, or excessive or unacceptable loss of efficiency. If management determines that an accommodation would cause an undue hardship, the agency is under no obligation to accommodate the employee.

**Decision Point Six - Health and Safety.** Would accommodation result in an undue risk of harm to the employee or others?

If the potentially disqualified employee has suggested an accommodation that would allow them to perform the essential functions of their position without undue hardship to the agency, management must determine whether this accommodation would result in an undue risk of harm to the employee or others. This excessive safety or health risk could be in the form of potential sudden or subtle incapacitation while on the job, potential reaction(s) to medication(s) or other concerns. If management determines that an individual cannot be accommodated without undue risk of harm to themselves or others, the agency is under no obligation to accommodate the employee.

**Decision Point Seven - Other Options.** After consideration of all available options for accommodating the medically disqualified employee at their present position, the IMRB may also evaluate other positions, locations, or alternatives identified by management. All of these options will be considered, and those that provide an acceptable outcome in term of medical risk management will be forwarded for management consideration.