



**United States Department of the Interior
U.S. GEOLOGICAL SURVEY**

Human Resources Operating Procedure

Title: Pre-employment Medical Examination Procedures

Reference: 5 CFR 339, DOI, Personnel Bulletin 98-1 (339), DOI Occupational Medicine Program Handbook (485 DM 18), and USGS Memorandum from Julie Wozniak dated xx-xx-2016

Purpose: Guidance on the operational procedures for a pre-employment medical examination

Background: As required by 5 CFR 339, USGS must conduct pre-employment medical examinations for all positions that encounter arduous activities. Arduous positions are those defined as 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.

Information can be found in the DOI Occupational Medicine Program Handbook by clicking here:

https://www2.usgs.gov/humancapital/hr/documents/DOI_Occup_Med_Prog_Handbook.pdf

Examples of arduous activities can be found starting on page 292.

Procedures:

1) Determination for Pre-employment Medical Examination:

The Staffing/Classification (S/C) Specialist reviews the position description to determine if a pre-employment medical examination is required. **This determination is made by reviewing the major duties, physical and environmental demands described in Factors 8 and 9 [or] under additional information section for RGE Factor 4 PD's and, if applicable, the vacancy questions (KSA's/Assessment Questions) and Job Analysis and works in consultation with the hiring manager. When classifying a 4 Factor PD for Research positions, the supervisor must address the physical requirements and environmental demands by using a PD amendment form (DI-625). If the Hiring Manager fails to annotate the DI-625 with the pre-employment medical requirement, the S/C Specialist will do so by writing "A pre-employment medical examination is required," in item #24 of the remarks section on the OF-8. In addition, the Recruitment Worksheet must be annotated appropriately by the hiring manager.

Note: If the PD indicates physical and/or environmental demands where a pre-employment medical examination should be required, but the manager/supervisor doesn't want to have one conducted, the S/C Specialist must consult with the manager to resolve the situation. If an agreement regarding the requirement cannot be reached, please consult with your Team Supervisor and/or HR Officer to raise the conversation up the chain of command.

2) Processes for Pre-employment Medical Examination

S/C Specialist/Assistant Responsibility:

When the position requires a pre-employment medical examination, the vacancy announcement will include a remark under "Key Requirements". The S/C Specialist/Assistant will ensure the position description lists the arduous duties and the pre-employment physical requirement.

Upon selection, a tentative job offer will be made pending the successful completion of the pre-employment medical examination. The tentative offer letter must state that the appointment is subject to the successful completion of a physical examination and any other documents required prior to setting an effective date.

The S/C Specialist/Assistant will receive the OF-178 from physician offices and will take the appropriate action depending on the comments from the physician, and will communicate requirements and findings to the hiring manager.

Science Center/Office Administrative Responsibility:

Once the tentative job offer has been made, the S/C Specialist/Assistant will remind the hiring Science Center/Office that a pre-employment medical examination is required of the selected applicant. In most cases, the Administrative Officer/Administrative Assistant (AO/AOA) will be initiating the process with the applicant for the cost center and will serve as contact for the selectee and the health provider. The OF-178 is accessible on OPM's website at http://www.opm.gov/forms/pdf_fill/OF178.pdf.

The Manager must complete: Part B, items: 1-4b first. Then the AO/AOA will ask the selectee to complete Part A of the OF-178. The selectee will seal the completed OF-178 and provide it to the physician or other licensed health care professional who performs the medical evaluation.

- Item 1. Purpose of Examination (Is it pre-employment or are they already employed?);
- Item 2. Position Title, Series and Grade of the position;
- Item 3. Indicate "see attached copy of the position description" including information from factor levels 8 and 9 (attach copy of position description (PD) to the OF-178); and
- Item 4a. Functional Requirements (**Hiring Manager Responsibility** in consultation with HR and Safety as necessary)

Item 4b. Environmental Factors (Hiring Manager Responsibility in consultation with HR and Safety as necessary)

If the Center/Office Hiring Manager has questions about how to complete the factors in Part B (4a or 4b), he/she should consult with their local Center/Office Collateral Duty Safety Program Coordinator. It is crucial that the environmental/physical factors are accurate, so the examining physician or licensed health care professional can assess the selectee's physical capabilities to perform the duties of the position.

The Science Center/Office is responsible for paying the cost of the selectee's pre-employment medical examination. If any additional medical reviews/evaluations are required after a standard medical evaluation, the selectee will be responsible for those costs.

Selectee Responsibility:

Prior to the physical examination the AO/AOA will provide the selectee with the OF-178 form, PD, and a labeled envelope (using Federal Express or Priority Mail marked "Confidential" for tracking purposes due to personally identifiable information contained therein) with the address of the HR Office (HRO) and servicing S/C Specialist/Assistant's name. The selectee will provide the examining physician or licensed health care professional with the envelope and OF-178 that the examining office will mail the completed OF-178 or fax/email back to the HRO upon completion of the examination. It is the responsibility of the selectee to notify the AO/AOA if he/she was unable to appear for the scheduled medical examination.

Referral to Federal Occupational Health Center (FOHC) by the Center: AO/AOA, FOH Representative and Selectee Responsibility:

The HRO strongly recommends that the Center/Office uses a FOHC to conduct the pre-employment medical examination, but other licensed medical providers are acceptable. The AO/AOA is responsible for contacting the FOH representative to request that a physical examination be scheduled for the selectee. The Center will fax/email the FOH representative a copy of the OF-178 form, PD and scope of work (SOW-document that describes work/activity to be completed by FOHC), and any other materials or documents germane to the requirements of the position. After FOH reviews the documents, they will contact the nearest FOHC about the examination request and the FOHC will contact the selectee of his/her examination date, time and location. (<http://foh.hhs.gov/whereweare/directory.asp>).

If there is no local FOHC or no FOH recommended provider in the area, the AO/AOA will instruct the selectee to make an appointment with a licensed physician or licensed health care professional or licensed health care professional. If the selectee is unable to schedule an appointment within a reasonable period of time, the Center's AO/AOA may recommend that they go to a walk-in clinic or urgent care facility.

Note: This same process applies to current employees who are being placed into a new position requiring a pre-employment medical examination.

OF-178 Completed by Private Physician or licensed health care professional and Returned to HR Office:

Once the OF-178 is completed and returned to the S/C Specialist/Assistant by the physician, he/she will review the information provided in Part C by the examining physician.

When No Issues Are Noted: If the physician or licensed health care professional indicates that there are no limiting conditions or issues of concern with the examination, the Human Resources Officer or S/C Specialist, if granted delegation on behalf of the HR Officer, completes and signs Part E of the OF-178 Form.

When Issues Are Noted: If there are issues or limitation comments from the physician or licensed health care professional that the selectee may not be able to perform all the duties of the position, the S/C Specialist will discuss the determination with the Hiring Manager and options to move forward.

Note: If the individual is selected under a delegated examining announcement and is a preference eligible, the Office of Personnel Management, Employee Services – Hiring Policy (Medical) makes the final medical decision. The HRO will determine if prior levels of review by the DOI Medical Officer will be requested for additional supporting evidence. In addition, the HRO may need to assess if reasonable accommodation can be provided before forwarding to the appropriate levels (e.g. HR Officer, Bureau HR Officer, Department-HR Officer, then to OPM). See Delegated Examining Operations Handbook Chapter 6 Section-D for more information.

3) Maintenance of Medical Records:

The servicing HR Office will maintain the pre-employment medical documents in the employee's medical file. This file is maintained in accordance with OPM and DOI policy and guidance on the maintenance of medical records.

4) Payment of Physicals:

For Information on the payment of physicals, please refer to the FOP Chapter 16-7, Attachment C – SF 1164 Preparation and Payment at the following link:

<http://internal.usgs.gov/ops/ofs/fop-handbook/FOPindex.html>

Waivers:

A waiver is a request made by the employee or applicant asking the USGS to forgo a medical standard or standards. An employee or applicant who does not meet the medical standards or physical requirements, but has consistently demonstrated the ability to perform his/her job in a satisfactory manner without an undue risk of harm to himself/herself or others is eligible to request a waiver of a medical standard. This request can only be made once the medical examination has been conducted.

Title 5 CFR 339.204, Medical Qualification Determinations, states “agencies must waive a medical standard or physical requirement established under this part when there is sufficient evidence that an applicant or employee, with or without reasonable accommodation, can perform the essential duties of the position without endangering the health and/or safety of the individual or others.”

Requests for Waivers must be submitted in writing by the employee/applicant to the Hiring Manager. The request must be signed off by their immediate supervisor(s) (if a USGS employee) or Hiring Manager if applicant. The waiver must have the AD/RD concurrence and will be reviewed by the Bureau Human Resources Officer; Bureau Safety Office and the Medical Review Officer.

In the waiver request the employee must demonstrate that they can perform the essential functions of their job safely and efficiently and have been doing so in the past. They can do this by citing past performance history and their immediate supervisor should support that position and may be asked to provide written justification. In the case of an applicant, they would have to provide relevant employment history and documentation or convincing evidence or both that they can perform the essential functions of the job safely and efficiently since they do not have a past history with the USGS to draw on.

Example of a waiver – an employee does not meet the far vision standard of 20/40 in each eye. They have done everything they can to correct their vision to 20/40 by getting glasses, but their vision is 20/45 in the right eye. The employee then requests that the agency waive, or in other words, forgo the standard. This is based on the fact that they have been performing the duties of the job in spite of the fact that they cannot meet the 20/40 far vision standard. If the employee is granted a waiver, then he/she can return to work without restriction. If an applicant is granted a waiver, then the remainder of the hiring process may continue.