Element 9: Injury Management/Return to Work Programs

Overview

Injury management/return-to-work (IM/RTW) programs are a proactive way for employers to help injured workers stay at work or return to productive and safe employment as soon as physically possible. These programs are based on the understanding that many injured workers can safely perform meaningful and productive work during the process of recovery, and that returning to work can be an effective part of the worker’s therapy and recovery. Effective injury management/return-to-work programs are initiated when the worker first contacts the employer. At this time, an early intervention procedure can be initiated to determine whether the worker is capable of staying at work to perform normal duties or modified duties while the injury heals. In many cases, this prevents any time lost from work. If workers do need time away, the injury management/return-to-work program can reintegrate injured employees into the workforce much earlier and on average with better health outcomes for the worker.

While this element is long and has many details, it again covers the three basic themes:

- What are you supposed to do?
- Is there training for that?
- Are you actually doing it?

Key Concepts and Implementation Tips

In order to meet the above objectives, the audit checks whether:

- The employer has a written policy and procedure for return-to-work and stay-at-work injury cases.
- Cases are tracked from first injury through rehabilitation and analyzed to improve the program. Tracking includes:
  - date and nature of injury and absence with first aid report and link to investigation
  - medical details if any
  - claim contact details if any
  - contact schedule with worker while absent
  - return-to-work or stay-at-work plan with estimated end date
  - involvement of multiple parties (first aid, medical, WorkSafeBC, coordinator, worker, supervisor, human resources, union if any, etc.)
  - any modifications to the plan based on worker progress
  - conclusion of case
  - analysis of case with suggestions for improvement.
- The program coordinator’s duties have been defined and appropriate training given.
- Record-keeping and privacy requirements are being met.
- People with responsibilities in the program (managers, supervisors, HR, first aid, etc.) have been trained appropriately.
- Workers have been trained in how to access the program from their first orientation (or from the start of the program for more experienced workers), so they expect that every injury will result in a return-to-work or stay-at-work plan.
- Meaningful alternate duties have been written down in advance.
- The benefits of the program are promoted to workers, instead of simply informing them of the program’s existence.
- There is a prepared package to send with the worker to the doctor.
- Training records exist.

### SUPPORTING RESOURCES:

**How to – Injury Management**

<table>
<thead>
<tr>
<th>Resource</th>
<th>URL</th>
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<tbody>
<tr>
<td>Rehabilitation and return to Work (WorkSafeBC)</td>
<td><a href="http://www.worksafebc.com/claims/rehab_and_IM/RTW/default.asp">http://www.worksafebc.com/claims/rehab_and_IM/RTW/default.asp</a></td>
</tr>
<tr>
<td>Return to Work: Good for Business, Good for Workers (WorkSafeBC)</td>
<td><a href="http://www2.worksafebc.com/Publications/Multimedia/Videos.asp?ReportID=36382">http://www2.worksafebc.com/Publications/Multimedia/Videos.asp?ReportID=36382</a></td>
</tr>
<tr>
<td>Navigating Challenging Slopes – A Modified Work Trail Map (go2)</td>
<td><a href="http://www.go2hr.ca/health-safety/program-tools/sector-specific-resources/ski-areas#ski-modified">http://www.go2hr.ca/health-safety/program-tools/sector-specific-resources/ski-areas#ski-modified</a></td>
</tr>
</tbody>
</table>
Guidelines for Modified Work (WorkSafeBC)


TRAINING OPTIONS:

Training – Joint Occupational health and safety Committee

Employers’ Advisers Office http://www.labour.gov.bc.ca/eao/

WorkSafeBC database of training providers http://www.ohstrainingbc.com/

CCOHS http://www.ccohs.ca/products/courses/return_to_work/

RELEVANT REGULATION AND LEGISLATION:

Occupational Health and Safety Regulation (WorkSafeBC) There is no regulation for Injury Management. It is purely best business practices.

Workers’ Compensation Act (BC Gov’t) http://www2.worksafebc.com/Publications/OHSRegulation/WorkersCompensationAct.asp#SectionNumber:Part3Division1 Social Responsibility Section 107 Responsibility to care for workers (even when injured) Section 115 (a) and (e)

Guidelines for Using the COR Audit Tool

QUESTION 9.1
Is there a policy outlining the company’s commitment to the Injury Management / RTW Program that details program objectives?

Auditor Guideline
• Review documentation - if they have a written policy and it outlines the objectives of the program.
• Observe if the policy is posted in the workplace.

Employer Guideline
• There needs to be a policy that states clearly what the goals of the IM/RTW program include. This can be done in a bullet-format document or a paragraph. The policy can stand alone or be part of a general safety policy or mission statement. During the observation tour, auditors are looking to see that this policy is posted on an OHS board or otherwise readily available to workers for reference. This can be on a shared computer drive or Intranet that everyone can access.

Types of Documentation to Review
• IM/RTW policy
QUESTION 9.2
Is there a written Injury Management / RTW Program?

**Auditor Guideline**
- Review documentation to confirm proof of a written Injury Management / RTW Program.

**Employer Guideline**
- Auditors are looking for a program in place that shows the steps, and the documents required, to complete the process. The program needs to include a summarized step-by-step instruction for injury management. For example:
  - first response to injury
  - worker reporting requirements
  - medical assessment
  - contact with worker by the employer
  - employer’s reporting requirement to WSBC
  - claims management
  - identification of alternate or modified duties available
  - process to develop IM/RTW plan.
  - process to modify IM/RTW plans depending on worker progress.

**Types of Documentation to Review**
- IM/RTW program

QUESTION 9.3
Are outcomes of the Injury Management / RTW Program tracked and analyzed?

**Auditor Guideline**
- Review documentation to determine if outcomes are tracked.

**Employer Guideline**
- The company needs to have a case tracking system; this could be done electronically with in-house software or on a spreadsheet that is maintained by an outside third party. There needs to be evidence that the results are tracked and that management is looking at them to identify trends. If there are outcomes but no analysis, this is insufficient for the points. If there is non-documentation evidence that there is tracking and analysis, this should be recorded here but is not worth points. If the company has no cases yet and therefore no outcomes to analyze, this question could be scored as “not applicable.”

QUESTION 9.4
Is the analysis of the program outcomes utilized to improve the program?

**Auditor Guideline**
- Interview Managers to determine if actions are implemented to address the opportunities identified as a result of the analysis.
Employer Guideline
- This question flows from 9.3. and seeks to determine whether management is aware of the results being tracked, and what happens to that information afterward. The tracking and analysis need to exist (but not necessarily be documented for the purposes of this question) before they can be used to improve the system. Random improvements that do not come from analysis are not positive findings. This question could be deemed “not applicable” if there are no relevant cases.

QUESTION 9.5
*Have the duties of an Injury Management / RTW Coordinator been assigned and does this outline the authority to establish and implement IM/RTW plans?*

Auditor Guideline
- Review documentation (roles and responsibilities document) to determine if program coordination duties have been assigned.

Employer Guideline
- The company needs to have a list of responsibilities identified for the IM/RTW coordinator, and it could be part of IM coordinator’s job description. The responsibilities include the steps needed to put the IM/RTW plans into action. This information needs to be in a policy, procedure or other guidance document rather than solely existing in meeting minutes. For large companies, more than one coordinator may be assigned.

Types of Documentation to Review
- Roles and responsibilities of IM/RTW coordinator

QUESTION 9.6
*Has education been provided to ensure the coordinator has an understanding of Injury Management / RTW Programs?*

Auditor Guideline
- Review documentation (training records or credentials of the coordinator) to determine if training has taken place.

Employer Guideline
- IM/RTW coordinators need to have training appropriate to the program they are administering. If a third party administers most of the program, the company contact still needs training for the part of the system performed in house. Training could range from evidence of an HR certification through to attendance at a briefing by the third-party service provider. Companies that are administering their own program need to have a coordinator with at least the training equivalent of the four hours of the Employer’s Advisors Office Claims Management program, modules 1 and 2. If there is more than one coordinator in large companies, they all need training appropriate to their duties in order to be awarded points.
QUESTION 9.7
Does the individual assigned Injury Management / RTW duty have as awareness of the relevant legislation? (i.e. Human Rights, Workers Compensation Act)

**Auditor Guideline**
- Interview the Injury Management / RTW Program coordinator to determine awareness of legislation. The coordinator should, as a minimum, know where to access this information. If awareness is apparent award 10 points.

**Employer Guideline**
- This question aims to verify that those in charge of the IM/RTW program are aware of what legislation applies to their job and in what way. Their level of knowledge should be appropriate for their level of involvement in the program, and the basic awareness should include issues like human rights, and privacy.

QUESTION 9.8
Are policies or procedures in place regarding retention of records?

**Auditor Guideline**
- Review documentation to determine if records are retained for an appropriate amount of time.

**Employer Guideline**
- The company needs to have as part of its policy or procedures, or as a stand-alone document, an itemization of the documents that are to be stored, how many years will they be kept, where will they be stored, and what security measures are in place to protect the private information contained within those documents. This outline can be included in the policy related to safety records (question 7.1), or it can be a separate policy for handling IM/RTW cases.

**Types of Documentation to Review**
- IM/RTW policy or program, actual records related IM/RTW cases

QUESTION 9.9
Have relevant groups, such as HR, Injury Management / RTW, or OH&S been educated in privacy issues related to Injury Management / RTW?

**Auditor Guideline**
- Review documentation or training records to determine if education on privacy issues has been provided.

**Employer Guideline**
- Auditors are looking for a documented policy, procedure, or training that explains how the privacy of workers is to be maintained, and proof that this information has been shared with supervisors and managers. This could achieved through policy sign offs, or a sign-in sheet for a training session at which privacy issues were reviewed. The session’s topic could be privacy in general or specific to IM/RTW.
Types of Documentation to Review
- IM/RTW Policy, training records

**QUESTION 9.10**

*Does the company have a written process (series of steps) for dealing with all Injury Management / RTW cases?*

**Auditor Guideline**
- Review documentation to determine if a written process is outlined and communicated to employees.

**Employer Guideline**
- Auditors are looking for a step-by-step outline that shows what is to be done if someone gets injured, from the point of the injury through to the worker’s return to full duties. Question 9.2 deals with the company’s need for a step-by-step procedure for injury management. This question deals with the need for correct and workable content for each of those steps. The steps must also be communicated to employees, along with documented proof that the information was disseminated. For this question, bulletin boards would be acceptable documentation. This is an all-or-nothing question; the auditor wants to know that communication was presented in a reasonable form to all employees, while not requiring proof of comprehension.

Types of Documentation to Review
- IM/RTW program, meeting minutes, information posted for employees to view

**QUESTION 9.11**

*Does the company have a 'Stay at Work' initiative as part of the Injury Management / Return to Work Program?*

**Auditor Guideline**
- Review documentation (Injury Management / Return to Work Program procedures) to determine if a 'Stay at Work' process is outlined.

**Employer Guideline**
- This question is asking the company to show that the process applies to cases where there is no time loss, rather than requiring time loss before a worker can have light, modified or alternate duties. When appropriate for the injury, and usually on the advice of the first aid attendant, this stay-at-work program avoids any time loss and possibly even any claim costs. Meeting this requirement can be as simple as having a single sentence in the program stating that the process applies to both stay-at-work and return-to-work cases.

Types of Documentation to Review
- IM/RTW program
QUESTION 9.12

Does the company have alternate duties that are meaningful and productive identified in writing? Are Supervisors aware that they can offer modified duties when required?

Auditor Guideline
- Review documentation to determine if alternate work is identified.
- Interview Supervisors to determine if they have knowledge of the possibility of providing modified or alternate work to injured workers.

Employer Guideline
- The company needs to have a list of alternate duties or modified duties available to workers should they need them. This list must to be available in advance, since there is usually significant stress on the worker, supervisor and administrator when a worker is injured. Having the list in advance makes it very easy to present and gives time for creative solutions within the company. The auditor’s questions are posed to see whether supervisors know what some of the jobs available are or, if they have nothing in their immediate area, how to access jobs that other areas may have available.

Types of Documentation to Review
- List of alternative duties

QUESTION 9.13

Is education on ‘Stay at Work’ procedures provided to contact personnel and are these procedures being followed?

Auditor Guideline
- Review documentation to determine if education for contact personnel has taken place. Interview contact personnel to determine if procedures are being followed.

Employer Guideline
- For this question, “contact personnel” refers to people in the organization who would reasonably be the first to contact an injured worker before that employee leaves the work site. A contact person would typically be a supervisor, human resources person or first aid attendant, although someone from the security, reception or dispatch departments may be included, depending on the company. These people all need to have documented internal training in the company system and be able to recall how they would use stay-at-work scenarios if the situation arose. Documentation can range from certification to a training record to meeting minutes. Interviews are only with the contact personnel, not with all workers.

Types of Documentation to Review
- Training records for contact personnel, certifications, meeting minutes
QUESTION 9.14
Is there a procedure in place for maintaining contact with an injured worker? Does the procedure outline when contact is first made with the injured worker?

Auditor Guideline
- Review documentation outlining the Injury Management / IM/RTW process to determine if there is a procedure in place that includes established timelines.

Employer Guideline
- This question is looking for a procedure that details when first contact is made with an injured worker after the injury (on the day of or the day immediately after injury), and how often contact is made after that. (i.e. Daily, weekly, bi-weekly, monthly, etc.) This needs to be specifically outlined to guide the people implementing the program.

Types of Documentation to Review
- IM/RTW program

QUESTION 9.15
Is there a process to monitor return to work plans and is the process being followed?

Auditor Guideline
- Review documentation to determine if monitoring of the plan is occurring.

Employer Guideline
- Auditors are looking for a system that tracks the step-by-step progress of the IM/RTW program (such as initial contact with worker, doctors input, and subsequent contact with worker). This documentation can be done with a spreadsheet, a shared drive or program, the cover page of the injured employee’s file or in material managed by a third-party IM/RTW company. If there are no actually cases to review, the company needs to be able to show the blank templates that they would use, and any policy or procedure that directs how to use them.

QUESTION 9.16
Are end dates established for all Injury Management / RTW plans?

Auditor Guideline
- Review documentation to determine if plans have an established end date.

Employer Guideline
- This question is looking to see that IM/RTW cases are reviewed and given end dates. This is not to say that the end date will stay the same, but that the case has been reviewed and an estimated end date has been established. This can help when the case is being reviewed to see if realistic time lines have been provided, and as more data is collected the dates can be adjusted. Everyone heals at different rates as well, so the date may change several times throughout the case. Every case needs to have an estimated end date once medical personnel have set one. If there are no cases, the
company needs to have a procedure stating that all cases will have an end date assigned when medically possible.

**QUESTION 9.17**

*Are Injury Management / RTW plans modified to reflect progression of healing?*

**Auditor Guideline**
- Review documentation to determine if plans are being modified or if there is a process in place to consider modification, based on the worker’s abilities.

**Employer Guideline**
- The company needs to have a program that is flexible and can change as the condition of the worker changes. Healing times vary from person to person, and the program needs to show that it can bend as needed. This can be done with a spreadsheet, form or chart that tracks the worker’s progress. For example, there can be notes on when and why an end date was changed, according to condition of the employee, or a doctor’s note that updates what the employee is capable of handling in terms of alternate duties after a period of time. If there are no actual cases, then the company policy/procedure and blank templates need to be present and ready for use.

**QUESTION 9.18**

*Are Workers and Supervisors knowledgeable of the reporting process and requirements under the legislation?*

**Auditor Guideline**
- Interview Workers and Supervisors to determine their knowledge of the reporting process.

**Employer Guideline**
- This question helps determine whether workers and supervisors understand the reporting process — what needs to be reported to WSBC and why. Workers need to know to report all injuries to supervisors (or other parties as indicated by the company system) and also need to know that if they seek medical treatment advice for a work-related issue while away from work, they must promptly report that to the company. Depending on the company system, supervisors may directly report to WorkSafeBC or may report the information to someone else in the company who will report to WSBC. The auditor will want to interview the person responsible for this.

**QUESTION 9.19**

*Do company policies and / or procedures support a coordinated approach to Injury Management / RTW?*

**Auditor Guideline**
- Review documentation to determine if policies and procedures reflect coordination between the injured worker, RTW coordinator, union (if present), and HR department (if present).
**Employer Guideline**

- Auditors are looking to see whether the program has a system that includes more than one representative in case reviews. This can be determined by the part of the company policy outlining who is responsible for reviewing cases, including managers, safety coordinators, HR personnel and possibly union representatives. The size of the company will often dictate how this is done to be practical and effective. Completed cases do not need to exist to evaluate the policy.

**Types of Documentation to Review**
- IM/RTW policy, IM/RTW program

**QUESTION 9.20**

*Have Injury Management / RTW policies and procedures been effectively communicated to all Workers, Supervisors, and Managers?*

**Auditor Guideline**
- Review documentation (training records, minutes of safety meetings) to determine if policies and procedures have been communicated to all employees.
- Interview various levels within the company to determine awareness of the program.

**Employer Guideline**
- The company must provide proof that the IM/RTW program has been shared with employees. This can be achieved through worker orientation (provided all workers go through orientation that includes IM/RTW program) or through a safety-related meeting. There could be an annual meeting at which the program is discussed, or a newsletter that goes to all employees, some other form of communication or any combination of these methods. There must be documented proof of this communication, and the auditor’s interview will evaluate if everyone received the information and is aware of the program.

**Types of Documentation to Review**
- Training records, meeting minutes

**QUESTION 9.21**

*Does the Employer actively promote the benefits of the Injury Management / RTW Program?*

**Auditor Guideline**
- Observe if promotional information is readily available to Employees.
- Interview Workers and Supervisors to determine if the program is actively promoted.

**Employer Guideline**
- The company needs to promote the benefits of the program (i.e., why it is good for workers) rather than just state that the program exists. Unless exposed to promotional materials, some workers may think that the program is just a way for the company to reduce claims costs, not understanding that the program can be highly beneficial for them. Promotion can be done with posters, pamphlets, educational sessions, etc.
QUESTION 9.22
Are new employees provided with information on the Injury Management / RTW Program at new employee orientation?

Auditor Guideline
- Review documentation (training records or orientations) to determine if information regarding the program is provided in new employee orientations.

Employer Guideline
- New employee orientations (question 6.4) need to include IM/RTW as a topic. This can be seen in the employee files, the completed orientations, or a spreadsheet or program that tracks training. If there are no new employees, blank templates are sufficient.

Types of Documentation to Review
- Orientation and training records

QUESTION 9.23
Are medical practitioners advised of the company’s Injury Management / RTW initiatives? (A commonly used method is a written package sent with the injured worker to the physician).

Auditor Guideline
- Review documentation to determine if a process is in place to make medical practitioners aware of the Injury Management / RTW program (the ability of the Employer to provide alternate or modified duties).

Employer Guideline
- The company needs to communicate with medical professionals involved in any case of injury. There should be a letter to the doctor explaining the company’s IM/RTW process and the availability of alternate duties, a physical abilities form, and a sign off for the doctor to indicate what the worker is capable of doing. If there are no relevant cases during the auditor’s visit, having the form ready is sufficient.

Types of Documentation to Review
- Letter to physician, physical abilities form