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# Writing ADA and FEHA Compliant Job Descriptions in California: How to Meet the New Requirements

Presented by:

**Patricia S. Eyres**  
Eyres Law Group, LLP

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# Writing ADA and FEHA Compliant Job Descriptions in California: How to Meet the New Requirements

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## Why Job Descriptions are Important at Every Stage of Employment



## Top Seven Benefits of Updated Job Descriptions

1. Supports accurate compensation structure;
2. Helps decision makers with recruiting;
3. Helps manage performance expectations;
4. Documents proper payroll classifications;
5. Facilitates ADA/FEHA compliance;
6. Helps defend against discrimination claims;
7. Serves as a foundation for EEO reporting.

## FEHA-ADA Compliant Job Descriptions

- Establishes the necessary qualifications, skills, experience and essential functions for recruiting and hiring;
- Establishes job-related requirements for post-conditional offer, pre-placement medical examinations;
- Establishes essential job functions for evaluating return to work and reasonable accommodations;
- Serves as a roadmap for setting performance standards and evaluating stay-at-work and reasonable accommodations;
- Documents that tasks are job-related and consistent with business necessity for purposes of “imminent safety threat” defense.

## The Basic Components of a Job Description

- Job title
- Classification (exempt vs. non exempt)
- Department or site
- Level of authority or supervision / reporting structure
- Summary statement (what, how & why tasks are assigned)
- Specific responsibilities
- Specific tasks and functions performed
- Skills, education and experience required
- Physical and/or cognitive capabilities required

## Use Employment Terms Accurately

- Qualifications are skills and experience the incumbent must have to perform the position;
- A responsibility is something that the incumbent may perform or must supervise;
- A task or duty is what the job incumbent performs
  - What work is done (action)
  - How the work is done (procedures, materials, tools, equipment)
  - Why the work is done (objective)
- A function is a group of duties that constitute one of the distinct and major activities involved in the work performed.

## Responsibilities and Task Outcomes

- What is the required output level ?
- What are the expected results?
- What is the relationship between each task?
- Is there a task sequence or a task hierarchy?
- Are tasks performed at specified times or intervals?
- What are the physical, mental and cognitive requirements to accomplish the job?
- Is specific training necessary?

## What to Include in the Responsibilities Section

- Regular daily functions
- Recurring duties performed at regular intervals
- Equipment or technical resources used regularly
- Quantity and quality standards
- Responsibilities for following instructions
- Accountability for employer resources or results
- Responsibilities for management or supervision of others
- Environmental factors
- Travel or other special requirements
- Physical, cognitive or mental demands

## The JD as a Roadmap for Pre-Employment Inquiries

- Address the specific tasks and functions of the job;
- Address how the job applicant can perform the essential functions of that job, particularly physical, cognitive or emotional tasks;
- Address unique environmental factors at the worksite, particularly climate, sound or exposures,
- Address anticipated reasonable accommodations, where appropriate, for disabilities or special needs; and
- Follow consistent procedures for pre-employment drug tests, exams, background checks and security clearances.

## Qualifications and Competencies For Successful Recruiting

- Competency: a skill, knowledge or ability required for successful performance;
- State the level of ability required, with examples;
- Categorize as “required” or “preferred” rather than “desirable;”
- Avoid using subjective terms, such as “high-level;”
- Avoid phrases such as “desire to learn” and “commitment to growth.”

## Drafting Strategies for Effective Job Descriptions

- Use specific task statements, not generalizations.
- Use objective, rather than subjective terms.
- Remove outdated duties due to technology changes or workforce adjustments.
- Use accurate adjectives (“fast-paced”).
- Use action verbs (“assigns, writes, sorts”).
- Include only reasonable expectations.
- Avoid subjective terms involving attitude, cooperation.

## Avoid Using Imprecise or Generalized Language

### Subjective

- High stress/pressure
- Must concentrate
- High energy level
- Flexibility/Adaptability

### Objective

- Performs a variety of duties, often changing from one task to another
- Performs with frequent interruptions or distractions
- Complete a workload of xxx cases within established time deadlines
- Adjust priorities quickly as circumstances dictate. Ability to interact appropriately with colleagues for different purposes in different contexts.

### Essential Information to Make an Individualized Decision for a Timely, Good Faith Return-to-Work Process

- Each interactive process is an individualized evaluation and decision, taking into account three things:
  - The individual's functional capacity, limitations or restrictions;
  - The essential job functions of the job she has or she seeks;
  - The business needs of the organization in the window of time you are making the decision.
- An effective interactive process requires:
  - Concrete, reasonably current statements of essential functions;
  - Specific, unambiguous medical restrictions that address the essential job functions.

### Determination of What is Essential Requires An Individualized Analysis

- The determination of the essential functions of a position must be done on a case-by-case basis *so that it reflects the job as actually performed*, not simply the components of a generic position description.
- Every aspect of an interactive process is an individualized evaluation.



## Essential Job Functions FEHA Regulations Definitions

- “Essential functions” means the fundamental job duties of the employment position the applicant or employee with a disability holds or desires. May be essential if:
  - Job exists to perform the function
  - Limited number of employees available to distribute the function
  - Function is highly specialized , so the incumbent is hired for specific expertise to perform that function
- “Marginal functions” are those that if not performed, would not eliminate the need for the job or that could be readily performed by another employee or that could be performed in an alternate way

## Determine Essential Job Functions Case by Case

Determination of the essential functions of a position must be done on a case-by-case basis so that it reflects the job as actually performed, not simply the components of a generic position description.

Evidence of whether a particular function is essential includes, but is not limited to, the following:

- The employer’s judgments as to which functions are essential.
- Written job descriptions prepared before recruiting.
- The amount of time spent on the job performing the function.
- *Consequences* of not requiring incumbents to perform function.
- The terms of a collective bargaining agreement.
- The work experiences of past incumbents in the job.
- The current work experience of incumbents in similar jobs.

## Cast a Wide Net for Knowledgeable Job Incumbents

- The law gives deference to the employer's determination of essential job functions, BUT:
  - Jurors are often skeptical of significant physical requirements when incumbents aren't held to the same standards, and
  - Appellate courts are often reluctant to overturn a jury verdict that is based, in whole or in part, on their view of witness and employer credibility
- Make sure you are using realistic data, to avoid claims of "pretext" or retaliation
- When Detailed JD/JA isn't available, seek input from:
  - Supervisor(s) and second level manager
  - Other incumbents in the job, currently or in the recent past
  - Related positions job descriptions for other facilities
  - The employee in question – in the interactive dialogue

## Proving a Function is Really Essential And Not a Pretext to Discriminate

- Employer's judgment as to which functions are essential
- **Accurate, current** written job descriptions
- Amount of time spent on the job performing the function
- The **legitimate** business consequences of not requiring the incumbent to perform the function
- Descriptions in a collective bargaining agreement
- Work experience of past incumbents on the job
- Current work experience of incumbents in similar jobs
  
- References to the importance of performance of the job function in *prior performance reviews*

Reality Check:

Is the Function Really Essential or a Pretext to Discriminate?

- Leuzinger v. Lake County: \$1,679,001.00
  - \$369,000 past and future economic damages
  - 1,250,001 emotional distress damages
- A corrections officer had an industrial injury (wrist) and returned to work after two surgeries with restrictions on the amount of writing she could do in a work day.
- There were no job modifications and she performed all tasks on a regular basis.
- She then took medical leave for non-occupational cancer surgery. When she returned, she was told she couldn't perform her job because of the wrist restrictions



## Leuzinger vs. Lake County

### In the Words of the Court

“Perhaps the single weightiest piece of evidence that the jury could have relied upon was that Leuzinger in fact performed as a Senior Juvenile Correctional officer from July 8, 2003 (when she was released back to work following the second wrist surgery) through March 31, 2004 (when she left for medical leave due to breast cancer) without difficulties..... a jury might reasonably find this evidence *seriously undermines [the county's] assertion that Leuzinger could not perform the duties of the position after her second surgery...*”



### A Case in Point

McMillan v. State of New York (March 4, 2013)

- McMillan worked as a case manager for New York City’s Human Resources Administration (HRA), conducting home visits, processing social assessments, recertifying clients’ Medicaid eligibility, referring clients to other social service agencies. He was schizophrenic and his medication caused him to feel drowsy and sluggish in the morning.
- HRA had a “flex policy” for arrival time, based on long elevator waits and business factors. Also, McMillan’s supervisor tolerated his late arrivals for years. When she started to discipline him for tardiness, he formally requested flex time as a reasonable accommodation, which was denied because there would be no supervisor to work with him after hours, if he extended his day.
- He sued and a judge sided with the HRA’s argument that punctuality was an essential element of the job.
- The Appeals Court disagreed and reinstated the lawsuit, finding that **the City’s flex policy and historical tolerance of McMillan’s tardiness** demonstrated it wasn’t an essential job function.

## Job Task Analysis is a Roadmap for the Interactive Process

Consideration	Physical	Mental/Cognitive	Medical	More data needed
Physical tasks and duration of each task				
Mental activities				
Duration of stress				
Social interaction				
Communication required				
Licenses required				
Medical clearances required				
Duties performed at specific times of day?				

## What Tasks Require Major Life Activities Involving Physical, Sensory, Cognitive or Neurological Functions?

### **Physical Actions**

- Bending
- Climbing
- Reaching
- Crawling
- Crouching
- Squatting
- Lifting
- Balancing
- Standing
- Sitting
- Hand or foot motions

### **Sensory or Cognitive**

- Vision – close or distance
- Depth Perception
- Color vision
- Hearing/Listening
- Speaking/shouting
- Taste or smell
- Fingering
- Feeling
- Thinking
- Calculating
- Memory/Recall

## Examples of Physical Demands

- Bend: flexion of the upper trunk forward while standing and knees extended or knees flexed when sitting
- Lift: exertion of physical strength to move objects (specify weight) from one level to another
- Carry: hold or rest weighted objects (specify weight) directly on hands, arms, shoulders or back while moving from one location to another
- Climb: ascend/descend with gradual or continuous progress, using both hands and feet
- Push: exertion of force on or against an object (weight/size) to move it from one location to another.
- Feel: perceiving attributes of objects, such as size, shape, temperature or texture by touching with skin

## Examples of Sensory Demands

- Hearing: perceiving the nature of sounds by ear
- Taste/Smell: distinguishing with a degree of accuracy, differences or similarities in intensity or quality of flavors or odors by using tongue or nose
- Talking: expressing or exchanging information by means of the spoken word, or to convey detailed spoken instructions accurately, loudly or quickly
- Vision: clarity of vision at 20 inches or less
- Depth perception: three-dimensional vision. Ability to judge distances and spatial relationships to see objects where and as they actually are

## Action Verbs to Address Physical Demands

- Moves/transport
- Installs/removes/replaces
- Positions/places
- Ascends/descends
- Detects
- Diagnoses
- Installs/sets up
- Activities/controls
- Creates/fabricates
- Drafts/writes
- Compiles/ collects
- Inspects
- Prepares
- Communicates
- Determines/ Identifies / recognizes /perceives

## Sample Administrative Job Function Analysis

ACTION	OBJECT	LOCATION	GOAL	ESSENTIAL Y/N	% OF SHIFT
Retrieves and reviews	email and voice-mail	at the main office desk	in order to direct messages and inquiries to appropriate party	Y	10%
Answers	incoming telephone calls	at the main office desk	in order to take messages and direct calls to the appropriate party	Y	10%
Greets	Visitors, guests, delivery drivers	at the main office desk	in order to direct them to the appropriate party	Y	10%
Takes	customer orders	via telephone at the main office desk	in order to satisfy customer needs	Y	10%
Places	purchase orders to suppliers	via telephone at the main office desk	in order to obtain needed materials and supplies	Y	10%
Contacts	suppliers	via telephone at the main office desk	in order to determine delivery status	Y	10%

## What are the Cognitive Tasks?

- Analyzing
- Counting
- Concentrating or focusing with frequent interruptions
- Summarizing
- Interpreting written data (text or numeric)
- Synthesizing information from multiple sources
- Writing summaries or abstracts
- Interpreting written or verbal instructions
- Summarizing or responding verbally
- Recognizing social or professional behavioral cues

## What are Analytical Skills?

- **Classifying:** systematically arrange into groups or categories according to established criteria
- **Analyzing:** define the problem or objective, identify relevant factors, identify patterns and relationships, formulate logical and objective conclusions, recognize alternative

## Potential Reasonable Accommodations for Neurological, Cognitive or Emotional Disorders

### Attendance

- Flexible start or end times
- Modified weekly schedule

### Concentration

- Reduce distractions
- Increase natural lighting
- Work from home/telecommuting
- Divide up large assignments

### Control over Emotions

- Flexible breaks
- Stress management techniques
- Assistive animals (FEHA regs.)

### Fatigue

- Provide goal oriented workload
- Self paced workload
- Telecommuting part of the week

### Memory

- Provide job coach
- Provide a mentor
- Allow additional training time
- Written checklists or memory aids

### Organizational skills

- Daily weekly, monthly task lists
- Divide larger assignments into smaller tasks or goals



## Worksite and Workstation Issues

- What is the physical layout of the work-site?
- What equipment is used in the work setting?
- What functions and tasks are performed, and where?
- What conditions are required for task completion?
- Is the job site accessible (parking, entrances, exits, doors)?
- Are tasks completed in multiple, alternate, or remote sites?
- How is the workstation logistically arranged within the site?
- How do workers obtain and discard equipment and materials?
- How is the work organized at the worksite?
- How is the specific work station organized?
- Is the worksite/workstation stationary or in motion?

## Reducing Distractions As Reasonable Accommodations for Cognitive or Mental Disabilities

### Auditory Distractions

- Purchase a noise canceling headset
- Hang sound absorption panels
- Provide a white noise machine
- Relocate employee's office space away from audible distractions
- Redesign employee's office space to minimize audible distractions

### Visual Distractions

- Install space enclosures or cubicle walls
- Reduce clutter in the employee's work environment
- Redesign employee's office space to minimize visual distractions
- Relocate employee's office space away from visual distractions

## Where are the Tasks to Be Performed?

- Elevators or escalators
- Stairs or ladders
- Curbs or gutters
- Confined spaces
- Walking or standing on uneven surfaces
- Traversing inclines: uphill, downhill or mixed
- Public transportation – ground (bus, train)
- Public transportation – air
- Travel across multiple time zones
- Physical workspaces under normal operating conditions or foreseeable travel
- Ingress and egress in foreseeable emergencies

## What Essential Functions Involve Communication Requirements: Speaking, Gesturing or Interacting?

- Large Group meetings
- Small group meetings
- Large group presentations
- Group training or teaching
- On-the-Job training that requires demonstration
- Professional networking, business development
- Social interactions with colleagues or clients
- Telecommuting
- Teleconferencing

## Reasonable Accommodations for Professional and Interpersonal Communications with Certain Cognitive and Mental Disabilities

- Provide a job coach to help understand different social cues
- Identify areas of improvement in a fair and consistent manner
- Make attendance at social activities optional
- Use training videos to demonstrate appropriate workplace behavior
- Encourage co-workers to minimize personal conversation
- Take unnecessary personal conversations away from work areas
- Provide awareness training for leaders and co-workers
- Encourage all employees to model appropriate social skills
- Assign a mentor to assist with social interactions in group settings
- Adjust the supervisory method to better fit the employee's needs
- Allow the employee to work from home
- Adjust method of communication to best suit the employee's needs

## What are the Environmental Conditions?

- Driving car, truck, forklift or equipment
- Working around moving equipment
- Operating hazardous equipment
- Exposure to dust, gas or fumes
- Excessive noise, vibrations, sensory conditions
- Working in sunshine or inclement weather
- Wet/dry conditions
- Hot/Cold – Inside/outside
- Working with florescent lighting
- Working in dark areas
- Physical contact with chemicals or substances
- Exposure to electric shock, vibration or toxic chemicals

## Is Stress or Pressure a Part of Performing Essential Job Functions?

- Extensive or high volume of paperwork
- Fast-paced daily work output
- Long hours/overtime
- Tedious detail work (written or verbal)
- Tight deadlines
- Large caseload
- Working with frequent interruptions
- Working with direct supervision
- Working with minimal supervision
- Dealing with difficult situations involving the public or staff
- Extreme environmental conditions (noise, smell, heat or cold)
- Working in areas subject to foreseeable emergencies

## What is the Level of Supervision?

- Close Supervision: incumbent is assigned duties according to specified procedures and receives detailed instructions. Work is checked frequently.
- General Supervision: incumbent normally receives little instruction on day to day work and receives general instructions on new assignments
- Direction: Incumbent establishes methods and procedures for attaining specific goals and objectives and receives guidance with broad goals. On the final results are viewed.
- General Direction: incumbent exercises wide latitude in determining objectives and approaches to critical assignments.

## Is Self-Management Required?

- Fluctuating workload
- Prioritizing: set priorities which accurately reflect the relative importance of job responsibilities
- Follow through: work independently and follow through on assignments with minimal direction
- Ambiguity: take action when answers to a problem are not readily apparent

## Concrete Approaches to Reasonably Accommodating Organization and Task Prioritization

- Divide large assignments into several small tasks
- Establish interim deadlines with regular progress follow up
- Use flow-chart to indicate steps in a task
- Provide verbal or pictorial cues on written instructions or checklists
- Use weekly chart to identify daily work activities
- Set a timer with alarm after assigning ample time to complete a task
- Provide written instructions or checklists for assignments
- Supply handheld organizer and train on how to use effectively
- Consider color coding to prioritize tasks, events & importance level
- Allow additional training time for new tasks
- Speech recognition software to address detail oriented data entry issues
- Consider professional organizer services for entire work groups
- Use a job coach or mentor to teach/reinforce organization skills
- Assign new project only when previous project is complete, when possible

## JDs Help Support Direct and Imminent Threat Defense

1. **Job Must be Safety Sensitive:** Defense is available only if, after engaging in an interactive process, there is no reasonable accommodation that would allow the employee to perform essential functions in a manner that would not endanger his/her health or safety because the job imposes an imminent and substantial degree of risk.
2. **Risk Must be Present and Not Future:** No defense to assert that an individual with a disability has a condition or a disease with a future risk, so long as the condition or disease does not presently interfere with his or her ability to perform the job in a manner that will not endanger the individual with a disability or others. Factors:
  - Duration of the risk;
  - Nature and severity of the potential harm
  - Likelihood and imminence that potential harm will occur; and
  - Consideration of relevant evidence about past work history.
3. **Risk Must be Supported by Medical Judgment:** *“The analysis of these factors should be based on a reasonable medical judgment that relies on the most current medical knowledge and/or on the best available objective evidence.”*

## Obtaining Medical Information to Support Direct and Imminent Threat Defense

- **Job Related** means tailored to assess the employee’s ability to carry out the essential functions of the job or to determine whether the employee poses a danger to himself or to others due to the disability
- **Business Necessity** regarding medical or psychological examinations means that the need for the disability inquiry or medical examination is vital to the business

## Have you Covered all the Bases?

- Job identification – title, division
- Job structure within organizational setting
- Qualifications and skills required
- Responsibilities
- Job tasks and time devoted to each
- Job requirements – physical, cognitive, mental
- Environmental conditions
- Unique aspects of the position
- Catch all statement for anticipated changes

## Checklist for Drafting and Implementing

1. Review accuracy on a regular basis;
2. Review whether tasks are still being performed as originally intended;
3. Evaluate staffing needs after workforce adjustment;
4. Get input from job incumbents and managers;
5. Put the JD to use and evaluate effectiveness;
6. Make any changes required by real-world monitoring; and
7. Anticipate future changes for prompt updating.
8. Use resources that are available to your organization.

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## **Patricia S. Eyres**

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Attorney Patricia S. Eyres, the managing partner of Eyres Law Group, LLP, focuses on helping employers manage disability discrimination issues for both workers' comp and non-occupational disabilities. As president of Litigation Management & Training Services and CEO/Publisher of Proactive Law Press, LLC, Ms. Eyres trains managers and supervisors on how to recognize risks, prevent lawsuits, and maintain defensible documentation.

## **JOB DESCRIPTION**

**JOB TITLE:**

**WAREHOUSE PERSONNEL**

**USUAL TIME OF WORK SHIFT:**

- 6:00 a.m. to 3:30 p.m. / Monday through Friday;
- 2:00 p.m. to 10:30 p.m. / Monday through Friday;
- 5:00 a.m. to 1:30 p.m. / Monday through Friday

8 - 10 hours per day, 40 hours per week

**BREAKS:**

Variable, depending on schedule,  
One 30 minute break; One 30 minute lunch

**OVERTIME:**

0 to 5 hours per week, as necessary

**SALARY:**

Undisclosed

**MACHINES USED:**

Electric motorized standing forklift, motorized man-lift (maximum height capacity: 144"), and Electric Pallet Jack

**TOOLS USED:**

General clerical items, knives, black tape, shrink wrap

**ASSISTIVE DEVICES:**

None

**SAFETY CLOTHING/EQUIPMENT:**

Uniform consisting of shirt and pants  
Suggested: hard toed shoes

**DESCRIPTION OF WORK PLACE/WORKSTATION:**

The work takes place within the company's distribution/transportation/warehouse facility; distributor for paper, food and janitorial supplies for the retail and wholesale markets. All activities take place within the warehouse area, which is modern, well lit, ventilated, level concrete floored, and well equipped with warehouse storage utensils, machinery and equipment, including a warehouse office for administrative duties. Other work areas include the loading/unloading area, stocking area and adjacent localities.



**QUALIFICATIONS FOR JOB:** On-The-Job Training

**DESCRIPTION OF JOB TASKS/PURPOSE:**

The warehouse worker selects orders and merchandise based on an inventory "pick list", which includes customer's orders. The "pick list" is distributed by the Warehouse Manager. Customer orders range from 1 case of containers to 2,000 cases. The Warehouse Personnel operates powered pallet jacks, forklifts and man-lifts, in order to move the merchandise. He/She shrink-wraps the order to secure the load. The order maximum size is 8' x 48" x 40". The Warehouse Personnel marks the order, places the pallet location on "pick list", and documents the processed orders. The Warehouse Personnel returns to the warehouse office in order to repeat the process by obtaining another "pick list."

The warehouse worker retrieves loaded pallets, double checks each item in order to ensure process accuracy and general quality control. He/She completes a "load completed" form. Other duties involve cleaning up, picking up of wrapping, sweeping warehouse areas using a push broom or a dust mop, emptying trash, picking up debris, stacking and sorting damaged pallets. Receiving involves processing inbound loads, verifying manifests, recording information in various documents, and performing general quality control for incoming amounts. The Warehouse Personnel assigns drivers to truck unloading docks for unloading activities. The Warehouse Personnel puts overstock and other merchandise away and restocks or replenishes fill pick-slots to capacity. He/She selects orders by obtaining a "pick list", pulling items and signing the "pick list" verifying the contents. The Warehouse Personnel verifies the picked order pallets, and ensures the correct content prior to customer delivery. Other duties include the physical loading of merchandise items in correct sequence, using motorized pallet jack, forklift and other equipment.

On a typical day the Warehouse Personnel performs the following duties:

1. Upon arrival, logs in and reports to the Warehouse Manager.
2. Obtains "pick list" from Warehouse Manager.
3. Selects orders and products, depending on "pick list" contents.
4. Operates motorized pallet jack, forklift or man-lift in order to transport product.
5. Shrink-wraps load and marks order place pallet location on "pick list."
6. Retrieves pallet, double checks each item for the process performed to ensure accuracy.
7. Concurrently, cleans up using push broom or push mop.
8. Receives inbound loads, verifying manifests, reviewing various documents, and maintaining quality control of accurate count.
9. Assigns truck drivers to appropriate unloading areas.
10. Puts overstock and related merchandise away.
11. Re-stocks and replenishes the fill-pick slots to capacity.
12. Verifies the full pallet loads, in order to ensure accuracy according to "pick list." This is in order to confirm the correct load prior to customer delivery.
13. Performs loading of truck trailers in the correct sequence, using the motorized pallet jack, forklift, and other equipment.

**ESSENTIAL & NON-ESSENTIAL JOB FUNCTIONS**

In order to create a complete picture of the specific job being described, and to help comply with ADA requirements, it is important that the essential functions of the job be listed. Essential Job Functions are those core job activities that define an employment position. Those activities that require the greatest portion of the Employee's work shift are usually essential functions. A "Typist" spends the greatest portion of his/her work shift typing. A "Welder" spends the greatest portion of his/her work shift welding. Therefore, those activities are essential to the job. Cleaning their respective equipment may not necessarily be essential to their jobs.

Although Job Descriptions list the physical requirements of the job, per the ADA “A job description will be most helpful if it focuses on the results or outcome of a job function, not solely on the way it customarily is performed.” This Job Description is designed to assist the Employer in making a determination as to whether or not a reasonable accommodation can be made for a disabled Employee allowing him/her to perform the essential functions of the job.

The following are the **Essential and Non-Essential Job Functions** for the job title listed on the first page of this document.

<b>ACTION</b>	<b>OBJECT</b>	<b>LOCATION</b>	<b>GOAL</b>	<b>ESSENTIAL Y/N</b>	<b>% OF SHIFT</b>
Selects	merchandise orders	at various warehouse locations	in order to fill the items in the "pick list" according to customer needs.	Y	25%
Transports	merchandise, container, etc. using motorized pallet jacks, forklift, or man-lift	to/from various warehouse locations	in order to fill customer orders and/or place merchandise in selected warehouse locations.	Y	25%
Marks	documents	at various warehouse locations	in order to document incoming/outgoing or processed merchandise.	Y	10%
Verifies	order load	at various warehouse locations	in order to ensure orders contain the required items for processing.	Y	10%
Sweeps	warehouse areas	at various warehouse locations	in order to ensure cleanliness and safety.	Y	5%
Receives	incoming merchandise	at loading docks	in order to ensure quality control and accuracy of items received.	Y	20%
Loads	merchandise orders and containers manually or using motorized equipment	at various loading areas	in order to ensure the merchandise is loaded in correct sequence.	Y	20%
Communicates	general warehouse written and verbal information to staff	at various warehouse office, storage or stocking locations	in order to ensure accurate communication with all personnel.	Y	15%
Shrink-wraps	loads of merchandise	at various warehouse locations	in order to secure loads for shipment.	Y	5%

\*Percentages may add up to more than 100% as tasks may overlap.

\*\*\*\*\*

**SUMMARY OF PHYSICAL DEMANDS**

This section discusses the physical demands of this position. Categories used are defined as follows:

- Never: Not necessary to perform job duties.
- Seldom: Done only a few times a day, for short duration, or not daily.
- Occasional: Up to one-third of the day.
- Frequent: Up to two-thirds of the day.
- Constant: Two-thirds or more of the day.

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**Sitting:** (To rest weight on buttocks and back of thighs with legs bent at knees.)

**Cumulated time during work shift:** Never (Not necessary to perform job duties.)

**Standing:** (To maintain body in erect posture in stationary position.)

**Cumulated time during work shift:** Occasional (Up to one-third of the day.)

**Average frequency of occurrence:** 3 to 5 times per hour.

**Average duration per occurrence:** 1 to 10 minutes.

**Activity:** While communicating with others, obtaining or delivering items, counting, verifying quality control, supervising staff, or operating forklift or pallet jacks.

**Walking:** (To move entire body in erect position.)

**Cumulated time during work shift:** Occasional (Up to one-third of the day.)

**Distance/Terrain:** Within a 20' radius on level concrete floor

**Average frequency of occurrence:** 3 to 40 times per hour

**Average duration per occurrence:** 10 to 50 seconds

**Activity:** While accessing various sites within the jobsite work area, while performing all duties.

**Lifting:** (To exert strength to move objects from one place to another.)

	Never 0 Hours	Occasional up to 3 hrs.	Frequent 3 – 6 hrs.	Constant 6 – 8+ hrs.	Height	Item(s) Lifted	Times Lifted per min./hr./day
0 – 10 lbs.			X		pallet top to overhead levels	various pieces of merchandise, containers, etc.	10 to 30 times per hour
11 – 25 lbs.			X		pallet top to overhead levels	various pieces of merchandise, containers, etc.	10 to 20 times per hour
26 – 50 lbs.		X			pallet top to torso levels	larger containers or related items	10 to 15 times per hour
51 – 75 lbs.	X						
76 – 100 lbs.	X						
100+ lbs.	X						

**Lifting Activities:** The maximum weight lifted is 50 lbs. This includes but is not limited to merchandise such as sacks of dried beans, rice, sugar, salt or a 12" x 12" x 12" case of cooking oil.

**Additional Comments:** The containers of food items are lifted and carried a maximum of 20' to/from storage. The company requires that any item weighing over 50 lbs. to be lifted by two warehouse workers ("team lift").

**Carrying:** (To hold objects while moving entire body.)

	Never 0 Hours	Occasional up to 3 hrs.	Frequent 3 – 6 hrs.	Constant 6 – 8+ hrs.	Distance	Item(s) Carried	Times Carried per min./hr./day
0 – 10 lbs.			X		20'	various pieces of merchandise, containers, and related items	10 to 30 times per hour
11 – 25 lbs.			X		20' maximum	various pieces of merchandise, containers, and related items	10 to 30 times per hour
26 – 50 lbs.		X			10'	larger containers or cartons	10 to 15 times per hour
51 – 75 lbs.	X						
76 – 100 lbs.	X						
100+ lbs.	X						

**Carrying Activities:** The containers of food items are lifted and carried a maximum of 20' to/from storage.

**Description of Heaviest Item Carried:** The maximum weight lifted is 50 lbs. This includes but is not limited merchandise such as sacks of dried beans, rice, sugar, salt or a 12" x 12" x 12" case of cooking oil.

**Neck Motion:** (To rotate, flex, or extend.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 5 to 10 times per minute

**Average duration per occurrence:** 1 to 3 seconds

**Activity:** While performing all duties as described.

**Bending:** (To stand erect or sit while bending upper body downward.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 30 to 60 times per hour

**Average duration per occurrence:** 3 to 5 seconds

**Activity:** While moving objects to/from lower storage locations, stacking on pallets.

**Twisting:** (To rotate upper body while feet remain stationary.)

**Cumulated time during work shift:** Occasional (Up to one-third of the day.)

**Average frequency of occurrence:** 3 to 12 times per hour

**Average duration per occurrence:** 1 to 3 seconds

**Activity:** While walking, placing or obtaining items, and operating equipment.

**Pushing:** (To exert force upon an object to move or change its direction.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 3 to 5 times per minute

**Average duration per occurrence:** 1 to 10 seconds

**Pushing pressure required:** 22 lbs. for a maximum fully loaded pallet weighing 1,000 lbs., a maximum distance of 50' using motorized equipment.

**Activity:** While moving motorized pallet jacks and merchandise containers.

**Pulling:** (To draw an object toward oneself to move or change its direction.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)  
**Average frequency of occurrence:** 3 to 5 times per hour  
**Average duration per occurrence:** 1 to 10 seconds  
**Pulling pressure required:** 22 lbs. for a maximum fully loaded pallet weighing 1,000 lbs.,  
a maximum distance of 50' using motorized equipment.  
**Activity:** While performing the same activities as listed under "Pushing".

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**Crouching:** (To bend upper body forward while fully flexing knees.)

**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)  
**Average frequency of occurrence:** 1 to 3 times per hour  
**Average duration per occurrence:** 3 to 5 seconds  
**Activity:** While accessing lower storage locations.

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**Kneeling:** (To maintain upper body in erect position while resting knees on ground.)

**Cumulated time during work shift:** Never (Not necessary to perform job duties.)

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**Crawling:** (To move entire body along a surface on hands and knees.)

**Cumulated time during work shift:** Never (Not necessary to perform job duties.)

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**Climbing:** (To ascend or descend heights using ladders, scaffolding, stairs, poles, inclined surfaces.)

**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)  
**Average frequency of occurrence:** 1 to 3 times per hour  
**Average duration per occurrence:** 3 to 5 seconds  
**Activity:** Climbing on/off pallet jacks, forklifts, and man-lifts.

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**Balancing:** (To maintain body balance while working at heights, on narrow surface or inclines.)

**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)  
**Average frequency of occurrence:** 1 to 3 times per hour  
**Average duration per occurrence:** 3 to 5 seconds  
**Activity:** While performing "climbing" duties.

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**Reaching:** (To extend arms upward or outward away from body.)

**Maximum Height:** Overhead  
**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)  
**Average frequency of occurrence:** 3 to 5 times per hour  
**Average duration per occurrence:** 3 to 5 seconds  
**Activity:** While obtaining or replacing items in upper storage locations; while shrink-wrapping,  
and as needed.

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**Average Height:** Torso Level

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 3 to 7 times per minute

**Average duration per occurrence:** 5 to 10 seconds

**Activity:** While performing all duties as listed.

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**Minimum Height:** Floor Level

**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)

**Average frequency of occurrence:** 3 to 5 times per hour

**Average duration per occurrence:** 5 to 7 seconds

**Activity:** While retrieving or placing items in lower pallet top or storage locations.

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**Use of Hands:** (To hold, grip, grasp, or otherwise manipulate items using fingers and hands.)

Dominant Hand: Right Left The Warehouse Personnel uses the hands continuously while performing all job duties. Most of the activities involve fine and gross manipulation of items.

**HOLDING:** (Use of hand(s) to control an item without forceful exertion while performing a job duty, i.e. – documents, binders, handful of small items, telephone receiver, etc.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 5 to 50 times per hour

**Average duration per occurrence:** 3 to 20 seconds

**Item(s) held:** Various merchandise items, containers, cartons, moving equipment, clerical items, etc.

**Activity:** While performing all duties as listed.

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**FINGER MANIPULATION:** (Use of the fingers as the primary instruments when performing a job duty, i.e. – assembling small parts, moving small items, etc.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 30 to 60 times per hour

**Average duration per occurrence:** 3 to 20 seconds

**Item(s) manipulated:** General merchandise containers, various items, moving equipment and other tools or related items.

**Activity:** While performing all duties as described.

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**POUNDING:**

**Cumulated time during work shift:** Never (Not necessary to perform job duties.)

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**GRIP/GRASP:** (Use of the hands to control an item using forceful extension, i.e. – hammer, vehicle steering wheel, pallet jack handle, etc.)

**Cumulated time during work shift:** Frequent (Up to two-thirds of the day.)

**Average frequency of occurrence:** 30 to 50 times per hour

**Average duration per occurrence:** 10 to 30 seconds

**Item(s) gripped/grasped:** Heavier merchandise items, larger cartons or other containers, pallet jack, forklift or man-lift controls, etc.

**Activity:** While performing the transport of items as described.

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**KEYBOARDING:**

**Cumulated time during work shift:** Seldom (Done only a few times a day, for short duration, or not daily.)

**Average frequency of occurrence:** 1 to 10 times per hour

**Average duration per occurrence:** 3 to 20 seconds

**Activity:** While performing computer data entry.

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**Use of Feet:** (To Manipulate items using feet.)

**Cumulated time during work shift:** Occasional (Up to one-third of the day.)

**Average frequency of occurrence:** 1 to 10 times per hour

**Average duration per occurrence:** 1 to 5 seconds

**Activity:** While activating the forklift, man-lift activation pedals.

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**Vision Requirements:** Near visual acuity, far visual acuity, color discrimination and depth perception

**Activity:** Constant (Two-thirds or more of the day, while performing all duties as listed.)

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**Hearing Requirements:** For general communication, signals, machine sounds.

**Activity:** Constant (Two-thirds or more of the day, while performing all duties as listed.)

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**Speech Requirements:** For general communication

**Activity:** Constant (Two-thirds or more of the day, while performing all duties as listed.)

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**Coordination Requirements:** Eye/Hand/Foot

**Activity:** Constant (Two-thirds or more of the day, while performing all duties as listed.)

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**Hazards Per Dept. of Labor:** None noted

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**Wheelchair Accessible for Job Performance:** No

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### ENVIRONMENTAL FACTORS

<b>Driving (car, truck, forklift, other):</b> <i>forklift, man-lift, pallet jack</i>	Occasional
<b>Working around moving equipment/machines:</b> <i>other motorized equipment as listed above</i>	Occasional
<b>Exposure to dust, gas, or fumes:</b> <i>dust, diesel exhaust</i>	Occasional
<b>Exposure to marked changes in temperature or humidity:</b>	Never
<b>Working at unprotected heights:</b>	Never
<b>Exposure to excessive noise necessitating ear protection:</b>	Never
<b>Walking or standing on uneven surfaces:</b>	Never
<b>Making physical contact with chemicals or other substances:</b>	Never
<b>Working inside:</b>	Constant
<b>Working outside or in unprotected conditions:</b> <i>loading/unloading vehicles</i>	Seldom
<b>Use of assistive devices to help move or lift objects:</b> <i>motorized forklift, man-lift or pallet jacks</i>	Frequent

Jsv (04/02/08)

_____	_____	_____
(Name)	(Title)	(Date)
_____	_____	_____
(Name)	(Title)	(Date)
_____	_____	_____
(Name)	(Title)	(Date)

## SAMPLE WORKSHEETS AND JOB DESCRIPTIONS

### JOB FUNCTIONS/PHYSICAL CAPACITY

	Nvr 0%	Rare 1-5	Seld 6-19	Occas 20-33	Freq 34-66	Cont 67-100		Nvr 0%	Rare 1-5	Seld 6-19	Occas 20-33	Freq 34-66	Cont 67-100
<b>LIFT</b>							Bend/Stoop			X			
1 - 10 lbs.			X				Twist		X				
11 - 20		X					Crouch/Squat		X				
21 - 35		X					Kneel		X				
36 - 50							Crawl	X					
51 - 75							Walk-Level					X	
76 - 100							Walk- Uneven			X			
<b>CARRY</b>							Climb Stairs		X				
1 - 10 lbs.			X				Climb Ladder	X					
11 - 20		X					Reach Shldr <input type="checkbox"/>				X		
21 - 35		X					Use Arms					X	
36 - 50							Use Wrists					X	
51 - 75							Use Hands					X	
76 - 100							Handling					X	
<b>PUSH</b>							Fingering					X	
1 - 10 lbs.		X					Foot Control		X				
11 - 20							<b>ENVIRONMENT</b>						
21 - 35							Inside					X	
36 - 50							Outside			X			
51 - 75							Heat		X				
76 - 100		X					Cold		X				
<b>PULL</b>							Dusty		X				
1 - 10 lbs.		X					Noisy		X				
11 - 20							Humid		X				
21 - 35							<b>HAZARDS:</b>						
36 - 50							Pathogens <input type="checkbox"/>	Mechanical <input type="checkbox"/>	Blood Borne	Radiant <input type="checkbox"/>			
51 - 75							Explosive <input type="checkbox"/>						
76 - 100		X					Burns <input type="checkbox"/>	Electrical <input type="checkbox"/>	Other				
							<input type="checkbox"/>						

# SAMPLE INVENTORY CONTROL WORKSHEET

Physical Ability	Most Demanding Essential Tasks	Environmental Factors
1. Stamina	Load/unload pallet of office furniture	1. EXPOSURE TO THE SUN: Less than 10% work time spent outside a building and exposed to the sun.
2. Extent Flexibility	Reach to shelve boxes of files/records	2. WORK ABOVE FLOOR LEVEL: Some work done on ladders, scaffolds, or other equipment more than 12 feet above the ground.
3. Dynamic Flexibility	Use hammer/saw to disassemble furniture	3. NOISE: Occasionally there are unusually loud sounds.
4. Static Strength	Move large/heavy office furniture in warehouse	4. SLIPPERY SURFACES: Occasional work on unusually slippery surfaces.
5. Explosive Strength	Break old furniture apart for disposal	5. INJURY POTENTIAL: Infrequent possibility of bodily injury.
6. Dynamic Strength	Climb up/down ladder to access records	6. ELECTRICAL HAZARDS: Potential electrical shock exposure.
7. Trunk Strength	Lift large/heavy office furniture from ground	7. DUST: Works in or around areas with major amounts of dust.
8. Speed of Limb Movement	Drive forklift in warehouse	8. HAZARDOUS MATERIALS: Rarely any opportunity for exposure.
9. Gross Body Coordination	Operate forklift foot/hand controls	9. COMMON ALLERGEN EXPOSURES: Infrequent exposure to common allergy-causing agents.
10. Gross Body Equilibrium	Carry boxes of records down ladder	10. IRREGULAR OR EXTENDED WORK HOURS: Occasionally required to change working hours or work overtime.
11. Arm-Hand Steadiness	Remove labels from boxes with blade scraper	
12. Manual Dexterity	Use hammer/saw to work on furniture	
13. Finger Dexterity	Connect wires to test computer	
14. Near Vision	Read information on computer screen	
15. Far Vision	Identify inventory at a distance	
16. Visual Color Discrimination	Distinguish color-coded tags on equipment	
17. Hearing	Communicate with co-workers	
18. Mobility	Walk throughout warehouse for equipment	
19. Effort	Load/unload pallet of office furniture	

## **SAMPLE Job Description**

Job Title: Machine Operator

### **SUMMARY**

Operates a variety of machines such as labeling machines, ink jet printers, tabbing machines, and inserting machines, to process component parts of a mailing package or self-mailers by performing the following duties.

**ESSENTIAL DUTIES AND RESPONSIBILITIES** include the following. Other duties may be assigned.

1. Studies work order and sample of work piece to visualize processes required, and plans sequence of operations.
2. Gathers component material(s) and positions it to accommodate efficient machine feeding with minimal body movement between material and machine.
3. Selects feed rate to obtain optimum throughput with minimal "jams" for each operation.
4. Adjusts controls and detection devices to process individual components or mail piece.
5. Starts machine and engages automatic feeding device.
6. Observes operations and regulates equipment.
7. Verifies conformance of machined process to specifications and obtains release of "first article inspection" from production supervisor.
8. Monitors quantity of units processed and records time and quantity on the work order.
9. Supervises support personnel to assure quality of work processed and compliance to specifications of ancillary processes.
10. Upon completion of process, moves completed units to next processing stage then clean the work area and return the excess materials to designated location.
11. As directed, performs the necessary cosmetic and mechanical maintenance to assure the continued operation of the equipment and the longevity of the company asset.

**QUALIFICATIONS** – To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

**EDUCATION and/or EXPERIENCE** – High school diploma or general education degree (GED); or one to three years' related experience and/or training; or equivalent combination of education and experience.

**LANGUAGE SKILLS** – Ability to read and interpret documents such as safety rules, operations and maintenance instructions, and procedure manuals. Ability to write routine reports. Ability to speak effectively to customers and/or employees of organization.

**OTHER SKILLS and ABILITIES** – Must be familiar with the pertinent sections of the Domestic Mail Manual as it relates to the specific classification and/or configuration of mail. Must be able to locate postage rate tables and interpret and apply the appropriate postage as required.

**WORK ENVIRONMENT** – The work environment characteristics described here are representative of those an employee encounter while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

While performing the duties of the job the employee is regularly working near moving mechanical parts. The noise level in the work environment is usually noisy.

### **ESSENTIAL PHYSICAL FUNCTIONS**

- Climb (moderate to frequent)
- Bend (frequent)
- Twist (frequent)
- Carry (continual)
- Lifting Requirements:
  - Carry (frequent)
  - Low Lift (frequent to continuous)
  - Medium Lift (frequent to continuous)
  - Heavy Lift (frequent)
- High lift (moderate)
- Operate Equipment (moderate to frequent)
- Sit (moderate)
- Squat (frequent)

### **ENVIRONMENTAL FACTORS**

- Work under time pressure (moderate to frequent)
- Interruptions (frequent)

### **ESSENTIAL COGNITIVE FUNCTIONS**

- Analyze (continuous)
- Computations (frequent)
- Generate Written Work Product (frequent)
- Independent Problem Solving (continuous)
- Interruptions (frequent)
- Maintain Positive Public Relations (moderate)
- Organize (frequent)