FIRST UNDERWRITERS INSURANCE BROKERS

Risk Management Resources

TEMPLATE

Return-to-Work Policy Template

A customizable framework for developing an effective return-to-work program

PREPARED BY

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This template is provided as a general guide. Consult legal counsel to ensure compliance with applicable laws.

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CUSTOMIZATION TIP: This template is designed to be customized for your organization. Bracketed text [like this] indicates areas where you should insert company-specific information. Gold instruction notes throughout the document provide guidance on customization.

Section 1: Policy Statement and Purpose

[Company Name] is committed to supporting employees who experience work-related injuries or illnesses by facilitating a safe and timely return to productive employment. This Return-to-Work (RTW) Policy establishes a structured framework for transitioning injured or ill employees back to work in a manner that protects their health, supports their recovery, and meets the operational needs of the organization.

1.1 Policy Purpose

The purpose of this policy is to:

- Provide early, safe return to productive work for injured or ill employees
- Minimize the physical, emotional, and financial impact of workplace injuries
- Reduce workers' compensation costs and improve the company's Experience Modification Rate (EMR)
- Demonstrate the organization's commitment to employee health and well-being
- Comply with all applicable federal, state, and local laws and regulations
- Establish clear procedures and expectations for all parties involved in the RTW process

[Customize: Insert company-specific language reflecting your organization's values and commitment to safety.]

1.2 Policy Statement

It is the policy of **[Company Name]** that every reasonable effort will be made to return injured or ill employees to meaningful, productive work as soon as medically appropriate. Modified or transitional duty assignments will be offered when available and when consistent with medical restrictions. This policy applies to all employees regardless of position, department, or length of service.

> **BEST PRACTICE:** Research shows that employees who return to work within the first two weeks of injury have significantly better long-term outcomes than those who remain off work for extended periods. Early RTW also reduces claim costs by 30-50%.

Section 2: Scope and Applicability

2.1 Covered Employees

This policy applies to all employees of **[Company Name]** who sustain a work-related injury or illness that results in medical treatment, lost work time, or work restrictions. This includes:

- Full-time employees
- Part-time employees
- Temporary and seasonal employees
- [Other categories as applicable to your organization]

2.2 Covered Conditions

This policy applies to injuries and illnesses that arise out of and in the course of employment, including:

- Acute injuries (e.g., falls, strains, lacerations)
- Repetitive motion injuries (e.g., carpal tunnel syndrome, tendinitis)
- Occupational illnesses (e.g., hearing loss, respiratory conditions)
- Aggravation of pre-existing conditions caused by work activities

> **NOTE:** Some organizations extend RTW programs to cover non-occupational injuries and illnesses as well. If your organization chooses to do this, modify the scope accordingly and ensure consistency with FMLA, ADA, and state leave laws.

Section 3: Definitions

Term	Definition
Return to Work (RTW)	The process of transitioning an injured or ill employee back to their pre-injury position or an alternative position consistent with medical restrictions.
Modified Duty	Temporary work assignments that accommodate an employee's medical restrictions while they recover from a work-related injury or illness.
Transitional Duty	Progressive work assignments designed to gradually increase an employee's physical demands until full duty is achieved.
Medical Restrictions	Limitations on work activities specified by a treating physician or authorized medical provider.
Maximum Medical Improvement (MMI)	The point at which an employee's condition has stabilized and is unlikely to improve further with additional treatment.
Treating Physician	The medical provider authorized to treat the employee's work-related injury or illness.
RTW Coordinator	The designated individual responsible for managing the return-to-work process within the organization.
Functional Capacity Evaluation (FCE)	A comprehensive assessment of an employee's physical abilities and limitations related to work tasks.

[Customize: Add any additional terms specific to your industry or organization.]

Section 4: Roles and Responsibilities

Successful return-to-work outcomes require the active participation of multiple parties. The following outlines the responsibilities of each stakeholder in the RTW process.

4.1 Injured Employee

- Report injuries immediately to supervisor
- Seek authorized medical treatment promptly
- Provide medical documentation including restrictions to RTW Coordinator
- Attend all scheduled medical appointments
- Accept modified/transitional duty assignments within medical restrictions
- Communicate changes in condition or restrictions to RTW Coordinator
- Participate in the RTW process in good faith

4.2 Immediate Supervisor

- Ensure injured employee receives immediate first aid or medical attention
- Complete and submit incident/injury report within 24 hours
- Maintain regular contact with injured employee during absence
- Identify potential modified duty tasks within the department
- Monitor employee's compliance with medical restrictions
- Document modified duty assignments and performance
- Report any concerns about the employee's condition to RTW Coordinator

4.3 RTW Coordinator

- Serve as the central point of contact for all RTW activities
- Coordinate communication between employee, supervisor, physician, and insurer
- Review medical documentation and restrictions
- Match available modified duty assignments to employee restrictions
- Monitor RTW progress and adjust assignments as needed
- Maintain confidential RTW files and documentation
- Track program metrics and report to management

Designated RTW Coordinator Name: _____

Title / Department: _____

Phone / Email: _____

4.4 Treating Physician

- Evaluate and treat the employee's work-related condition
- Provide clear, specific work restrictions and capabilities
- Communicate expected recovery timeline
- Respond to employer requests for clarification on restrictions
- Provide periodic progress reports and updated restrictions
- Determine when employee has reached maximum medical improvement

4.5 Insurance Carrier / Claims Adjuster

- Process workers' compensation claims promptly
- Coordinate medical treatment authorization
- Provide claims status updates to RTW Coordinator
- Support RTW efforts through resources and expertise

> **CUSTOMIZATION TIP:** Assign the RTW Coordinator role to someone with authority to make duty assignments across departments. In smaller organizations, this may be the HR manager or safety director. In larger organizations, a dedicated RTW coordinator is recommended.

Section 5: Return-to-Work Process

The RTW process follows a structured sequence from injury through full recovery. Each phase has specific actions and timelines designed to facilitate safe, timely return to productivity.

5.1 Phase 1: Injury Reporting and Initial Response (Day 0-1)

- Employee reports injury to immediate supervisor
- Supervisor provides first aid and/or arranges medical treatment
- Supervisor completes incident report within 24 hours
- RTW Coordinator is notified and initiates claim reporting
- RTW Coordinator contacts employee to explain RTW process and expectations
- Supervisor documents witness statements and scene conditions

5.2 Phase 2: Medical Evaluation and Restrictions (Day 1-3)

- Employee seeks authorized medical treatment
- Physician provides work status report with specific restrictions
- RTW Coordinator reviews medical restrictions
- RTW Coordinator begins identifying modified duty options
- Insurance carrier is notified of claim details

5.3 Phase 3: Modified Duty Assignment (Day 2-5)

- RTW Coordinator matches restrictions to available modified duty
- Modified Duty Assignment Form is completed (see Appendix A)
- Employee reviews and acknowledges assignment
- Supervisor orients employee to modified duty tasks
- RTW Coordinator notifies insurance carrier of modified duty placement

5.4 Phase 4: Monitoring and Progression (Ongoing)

- Supervisor monitors employee daily for compliance with restrictions
- RTW Coordinator checks in with employee weekly
- Medical updates are obtained per physician schedule
- Duty assignments are adjusted as restrictions change
- Progress is documented in RTW Communication Log (see Appendix B)

5.5 Phase 5: Full Duty Return or Permanent Accommodation

- Physician releases employee to full duty without restrictions
- If permanent restrictions exist, interactive process is initiated per ADA
- RTW file is closed and archived
- Lessons learned are documented for program improvement

Timeline	Key Activities
Day 0-1	Injury occurs, report filed, claim initiated, employee contacted
Day 1-3	Medical evaluation, restrictions obtained, modified duty identified
Day 2-5	Modified duty assignment made, employee begins transitional work
Ongoing	Weekly check-ins, medical updates, duty adjustments as needed
At MMI	Full duty release or permanent accommodation process initiated

IMPORTANT: Timeliness is critical. Studies show that for every day an employee remains off work after the first week, the probability of successful return decreases. Aim to make modified duty offers within 48 hours of receiving medical restrictions.

Section 6: Modified / Transitional Duty Program

6.1 Program Guidelines

Modified and transitional duty assignments are temporary positions designed to accommodate medical restrictions while keeping employees productive during recovery. The following guidelines govern these assignments:

- Modified duty assignments are temporary, not to exceed **[90 days / other timeframe]**
- Assignments must be within the employee's documented medical restrictions
- Assignments should be meaningful and productive for the organization
- Employees on modified duty receive their regular rate of pay
- Modified duty may be in the employee's home department or another department
- Assignments are re-evaluated with each medical update

[Customize: Specify the maximum duration and any pay provisions for your organization.]

6.2 Types of Modified Duty

Type	Description	Example
Same job, reduced hours	Employee performs regular duties for fewer hours per day or fewer days per week	Lifting restrictions that allow normal work in short durations
Same job, modified tasks	Employee performs most regular duties with specific tasks eliminated or modified	No overhead reaching; seated work only
Alternative job, same department	Employee performs different tasks within their department	Light clerical duties instead of physical labor
Alternative job, different department	Employee works in another department on tasks within restrictions	Warehouse worker assists with inventory data entry

6.3 Modified Duty Task Bank

Maintaining a pre-identified list of modified duty tasks makes it easier to quickly place employees when restrictions are received. Develop a task bank specific to your organization:

Category	Example Tasks
Office / Administrative	Filing, data entry, phone coverage, mail sorting, inventory counts, organizing supplies, training documentation review
Quality / Inspection	Visual inspections, measurement recording, defect logging, sample labeling, audit preparation
Safety / Training	Safety observation rounds, toolbox talk preparation, new hire orientation assistance, SDS organization
Maintenance Support	Parts inventory, work order tracking, tool organization, equipment manual updates, vendor coordination

BEST PRACTICE: Build your modified duty task bank proactively—before injuries occur. Survey department managers to identify tasks that are always available and can accommodate common restrictions. Having options ready dramatically speeds up RTW placement.

Section 7: Communication Protocols

Consistent, documented communication throughout the RTW process ensures all parties remain informed and aligned. Poor communication is the leading cause of RTW program failures.

7.1 Communication Schedule

When	Who → Whom	Purpose
Day of injury	RTW Coordinator → Employee	Explain RTW process, expectations, and next steps
Within 24 hours	RTW Coordinator → Insurance carrier	Report claim details and initial status
Upon receiving restrictions	RTW Coordinator → Supervisor	Share restrictions and discuss modified duty options
Weekly (during modified duty)	RTW Coordinator → Employee	Check-in on recovery progress and duty satisfaction
At each medical visit	Employee → RTW Coordinator	Provide updated work status report
Monthly	RTW Coordinator → Management	Summary report on active RTW cases and program metrics

7.2 Confidentiality

All medical information obtained during the RTW process is confidential and must be handled in accordance with applicable privacy laws. Medical documentation should be stored separately from general personnel files. Supervisors should only receive information about work restrictions—not specific diagnoses or treatment details.

> **IMPORTANT:** Never share an employee's specific medical diagnosis, treatment details, or prognosis with supervisors or coworkers. Supervisors only need to know the work restrictions—what the employee can and cannot do—not why.

Section 8: Medical Management

8.1 Authorized Medical Providers

[Company Name] maintains relationships with the following occupational medicine providers for treatment of work-related injuries:

Primary Provider Name / Clinic: _____

Address: _____

Phone: _____

Secondary Provider Name / Clinic: _____

Address: _____

Phone: _____

[Customize: In Washington State, injured workers generally have the right to choose their own treating provider. Check your state's rules regarding employer-directed medical care.]

8.2 Work Status Reports

The RTW Coordinator will provide the treating physician with a description of the employee's regular job duties and available modified duty options. The physician will complete a work status report at each visit that includes:

- Current diagnosis (for RTW Coordinator only, not shared with supervisors)
- Specific work restrictions (lifting limits, posture requirements, time limits, etc.)
- Whether the employee can perform modified duty
- Expected duration of restrictions
- Date of next medical appointment
- Expected date of maximum medical improvement

8.3 Independent Medical Examinations

In situations where there is a dispute regarding work restrictions, diagnosis, or treatment, **[Company Name]** or its insurance carrier may request an Independent Medical Examination (IME). The employee will be notified in writing of the IME appointment and is expected to attend.

Section 9: Compliance and Legal Considerations

The RTW program must operate in compliance with all applicable laws. Key legal frameworks include:

Law / Regulation	Relevance to RTW
Workers' Compensation Laws	State-specific requirements for benefits, treatment, and employer obligations. Washington: Title 51 RCW.
Americans with Disabilities Act (ADA)	Requires reasonable accommodation for employees with disabilities. The interactive process applies when permanent restrictions are identified.
Family and Medical Leave Act (FMLA)	Provides eligible employees up to 12 weeks of unpaid, job-protected leave. RTW and FMLA may run concurrently.
Washington Paid Family and Medical Leave	State-administered program providing partial wage replacement during qualifying absences.
HIPAA	Protects the privacy of employee medical information. Limits what medical data can be shared and with whom.
State Anti-Retaliation Laws	Prohibit adverse action against employees for filing workers' compensation claims or exercising their rights.

IMPORTANT: This template provides general guidance and does not constitute legal advice. Consult with qualified legal counsel to ensure your RTW policy complies with all applicable federal, state, and local laws specific to your jurisdiction and industry.

Section 10: Documentation and Recordkeeping

10.1 RTW Case File Contents

A confidential RTW case file should be maintained for each injured employee, separate from the general personnel file. The file should contain:

- [ ] Incident/injury report
- [ ] Workers' compensation claim form
- [ ] All medical work status reports and restrictions
- [ ] Modified Duty Assignment Forms
- [ ] RTW Communication Logs
- [ ] Correspondence with employee, physician, and insurance carrier
- [ ] Physician release to full duty or permanent restriction documentation
- [ ] Functional Capacity Evaluation results (if applicable)
- [ ] ADA interactive process documentation (if applicable)
- [ ] Case closure summary

10.2 Retention Schedule

RTW case files should be retained for a minimum of **[5 years / duration per your state's requirements]** after the case is closed. OSHA requires retention of injury/illness records for 5 years. Some states require longer retention. Consult legal counsel for your specific requirements.

> **NOTE:** Store medical records securely with access limited to the RTW Coordinator and designated HR personnel. Digital records should be password-protected with access logging enabled.

Section 11: Program Evaluation and Improvement

11.1 Key Performance Metrics

The RTW program should be evaluated regularly using the following metrics:

Metric	Target	Frequency
Average days from injury to modified duty placement	[Target: 2-3 days]	Quarterly
Percentage of injured employees placed on modified duty	[Target: 85%+]	Quarterly
Average duration of modified duty assignments	[Target: under 45 days]	Quarterly
Recurrence rate (re-injury on modified duty)	[Target: under 5%]	Annually
Employee satisfaction with RTW process	[Target: 80%+ positive]	Annually
Workers' compensation claim costs (current vs. prior year)	[Target: year-over-year reduction]	Annually
Experience Modification Rate (EMR) trend	[Target: declining or below 1.00]	Annually

11.2 Annual Program Review

The RTW Coordinator should conduct an annual program review that includes:

- Analysis of all RTW cases from the prior year
- Comparison of actual results against target metrics
- Identification of barriers and areas for improvement
- Update of modified duty task bank
- Refresher training for supervisors
- Review and update of this policy as needed

> **BEST PRACTICE:** Share RTW program results with management annually. Quantify the financial impact by comparing workers' compensation premium savings, reduced lost workdays, and improved EMR. This builds organizational support for continued investment in the program.

Appendix A: Modified Duty Assignment Form

[COMPANY NAME] — MODIFIED DUTY ASSIGNMENT

Employee Name: _____

Job Title / Department: _____

Date of Injury: _____

Date of Assignment: _____

Supervisor Name: _____

Medical Restrictions (from physician work status report):

_____

_____

Modified Duty Assignment:

Department: _____

Reporting To: _____

Work Schedule: _____

Tasks Assigned:

_____

_____

_____

Duration:

Start Date: _____

Expected End Date / Next Medical Review:

_____

Acknowledgments:

By signing below, the employee acknowledges receipt of this modified duty assignment and agrees to perform only the tasks listed above within the stated medical restrictions. The employee understands that exceeding restrictions or performing unauthorized tasks may result in re-injury and disciplinary action.

_____	_____
Employee Signature	**Date**
_____	_____
Supervisor Signature	**Date**
_____	_____
RTW Coordinator Signature	**Date**

Appendix B: RTW Communication Log

Employee Name: _____

Date of Injury: _____

Claim Number: _____

Date	Contact With	Method	Summary of Discussion	Follow-Up Needed

Method codes: P = Phone, E = Email, F = Face-to-face, M = Mail/Letter, V = Voicemail

Appendix C: Physician Release / Restrictions Form

[COMPANY NAME] — Work Status Report

To be completed by the treating physician at each visit.

Patient / Employee Name:

_____

Date of Injury: _____

Date of Examination: _____

Treating Physician: _____

Clinic / Facility: _____

Work Status:

- ☐ May return to FULL DUTY with no restrictions
- ☐ May return to MODIFIED DUTY with the restrictions listed below
- ☐ CANNOT return to work at this time
- ☐ Has reached Maximum Medical Improvement (MMI)

Physical Restrictions (check all that apply):

- ☐ Lifting limit: ___ lbs maximum
- ☐ No repetitive bending/stooping
- ☐ No overhead reaching
- ☐ Seated work only
- ☐ No climbing (ladders/stairs)
- ☐ No pushing/pulling over ___ lbs
- ☐ Limited standing: ___ hrs maximum
- ☐ Limited walking: ___ hrs maximum
- ☐ No use of left / right hand/arm
- ☐ No driving
- ☐ No exposure to: _____
- ☐ Other: _____

Work Schedule Restrictions:

- ☐ Full-time hours (no schedule restrictions)
- ☐ Limited to ___ hours per day
- ☐ Limited to ___ days per week
- ☐ Must have breaks every ___ hours

Expected duration of restrictions:

_____

Next appointment date: _____

Expected date of MMI (if applicable):

_____

_____ _____

Physician Signature **Date**

_____ _____

Printed Name **Phone**

Appendix D: Implementation Checklist

Use this checklist to ensure your RTW program is properly established and maintained.

Program Setup

- [ ] Customize this template with company-specific information
- [ ] Designate RTW Coordinator and define authority
- [ ] Establish relationships with occupational medicine providers
- [ ] Develop modified duty task bank with department managers
- [ ] Create communication templates (letters, forms)
- [ ] Set up confidential recordkeeping system
- [ ] Review policy with legal counsel for compliance
- [ ] Obtain management sign-off on policy

Training

- [ ] Train all supervisors on RTW policy and their responsibilities
- [ ] Train RTW Coordinator on claims management and medical coordination
- [ ] Communicate policy to all employees
- [ ] Provide injury reporting procedure training to all employees
- [ ] Train HR staff on confidentiality requirements

Ongoing Operations

- [ ] Review EMR worksheet annually for accuracy
- [ ] Conduct monthly claim reviews with insurance carrier
- [ ] Update modified duty task bank quarterly
- [ ] Evaluate program metrics quarterly
- [ ] Conduct annual program review and policy update
- [ ] Provide annual refresher training to supervisors
- [ ] Review RTW outcomes with insurance broker at renewal

Insurance Broker Coordination

- [ ] Share RTW policy with insurance broker
- [ ] Request EMR projections based on current claims
- [ ] Review loss runs quarterly with broker
- [ ] Discuss RTW program results at annual renewal meeting
- [ ] Verify experience modification worksheet accuracy with broker

Need help implementing your Return-to-Work program?

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