CITIZENS' ECONOMY & EFFICIENCY COMMISSION
LOS ANGELES COUNTY
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LOS ANGELES COUNTY'S

DISABILITY MANAGEMENT AND LIGHT DUTY PROGRAMS:

ANALYSIS & RECOMMENDATIONS

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The Commission's mission is to examine any function of County government at the request of the Board of Supervisors, on its own initiative, or as suggested by others, and to submit recommendations to the Board which will improve local government economy, efficiency and effectiveness.

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DISABILITY MANAGEMENT AND LIGHT DUTY PROGRAMS: ANALYSIS AND RECOMMENDATIONS

INTRODUCTION

In 2022, the Department of Human Resources (DHR) undertook a significant overhaul of its Countywide Return to Work program, introducing a new Disability Management and Compliance (DMC) framework. This framework was designed to support disabled employees who, whether temporarily or permanently, could not perform all the essential functions of their positions. On August 13, 2025, the DHR submitted a detailed report to the Board of Supervisors titled "Report Back on Board Motion - Ensuring Accessibility Protocols for Employees with Disabilities." This report was in response to a motion put forth by Supervisor Solis, which required a comprehensive review of the DMC framework and an identification of areas for improvement. https://file.lacounty.gov/SDSInter/bos/bc/1190103_LMGtoBOS-ReportBack-EnsuringAccessibilityProtocolsforEmployeeswithDisabilitieswAttachments08-13-2025.pdf

The report described the Department's thorough program, which addresses both short-term and long-term disabilities that affect employees' ability to work. It detailed the County's compliance with the federal Americans with Disabilities Act and California's Fair Employment and Housing Act (FEHA), which prohibits discrimination in employment and housing), emphasizing the need for a good-faith interactive process with employees. The report also described procedures for developing modified or alternative assignments for employees with disabilities.

Education is a key component of the program, offering ongoing and comprehensive support to Departmental Disability Management Coordinators (DMCs).

Coincidentally, at the same time, the Economy and Efficiency Commission (EEC) was conducting a survey of peer organizations' Light Duty programs for employees receiving workers' compensation benefits, a subgroup within the County's DMC framework. Based on these findings, the EEC developed recommendations for managing the modified and alternate duty assignment process for this subgroup.

LIGHT DUTY ASSIGNMENTS IN WORKERS' COMPENSATION

Within the workers' compensation system, a light duty assignment must strictly adhere to the temporary work restrictions determined by the employee's physician. If a good-faith offer of light duty meets these restrictions and the employee declines, their benefits may be affected. However, workers injured outside of their employment do not face such consequences if they decline temporary light-duty offers.

In 2010, the Rand Corporation conducted a comprehensive analysis of modified and alternative light-duty assignments for workers injured on the job. Tracking 17,000 California injured workers over five years, the study found that employees who returned to light-duty assignments reached Permanent and Stationary status 3-4 weeks sooner than those who did not. Furthermore, early return to work at the original employer was associated with substantial reductions in long-term earnings losses for disabled workers. The analysis highlighted the effectiveness of light-duty programs, particularly for large employers. (Reville, R., Seabury, S., et al. (2005). "An Evaluation of California's Permanent Disability Rating System." RAND MG-258-ICJ.)" https://www.rand.org/content/dam/rand/pubs/working_papers/2010/RAND_WR745.pdf

The 2022-2023 Los Angeles County Grand Jury report revealed that productivity at both the Fire Department and the Sheriff's Intake Reception Center was negatively impacted by the number of employees sidelined due to work-related injuries. This prompted the EEC to conduct a survey of three peer local public sector employers and their disability management programs, focusing on temporary light duty for injured workers. The EEC also interviewed Disability Managers at DHR and the Department of Public Works (DPW) for comparison.

The 2025 Los Angeles County Risk Management Report indicated approximately 11,000 new claims in 2023-2024, with most, if not all, claimants eligible for temporary modified or alternative light-duty assignments. https://riskmanagement.lacounty.gov/wp-content/uploads/2025/08/BM-Risk-Management-Annual-Report-FY-2023-24-SIGNED-1-29-25.pdf

The Risk Management Report does not provide an average length of time for an injured worker to be off work, so it is not possible to assess how many hours of productivity could be gained if every injured worker were to be placed on light duty. However, applying the Rand Corporation's finding of 3-4 weeks saved per employee on light duty, the County could potentially gain 33,000 - 44,000 additional hours of productive work post-Permanent and Stationary status if all injured workers were placed on light duty.

Unfortunately, neither DHR nor DPW was able to provide data on the number of employees on such assignments at any given time or over specific periods.

SURVEY FINDINGS

The survey revealed considerable variation among peer employers in their temporary light-duty program policies. Notably, there was a significant disparity between the City of Los Angeles' Personnel Department and its Department of Public Works. The EEC focused on describing the two most robust programs identified.

The City of Los Angeles' Department of Public Works operates a strong temporary light-duty program for employees with both work-related and non-work-related injuries. Their process, similar to the County's, involves an Interactive Process Meeting (IPM) with the employee and their representative to reach consensus on a suitable light-duty assignment that adheres to the doctor's

work restrictions. Employees injured on the job are required to accept the temporary position, with potential consequences for refusal, while those with non-work-related injuries do not face such repercussions.

The department has fostered a culture where employees understand that following a workplace injury, they will be assigned a temporary position to support their recovery and return to full productivity.

The City of Los Angeles uses a specific pay code for employees on light duty, allowing them to track related metrics. The County lacks a separate code and cannot report program progress.

One important innovation employed by the City's Public Works Department is to assign each member of the safety unit to a road crew for six months. After this deployment, the safety staff (similar to the County's DDMCs) understands road crew tasks well enough to create successful light-duty assignments.

Similarly, the Los Angeles Unified School District (LAUSD) has a comparable program, with similar consequences for employees who refuse good-faith offers of light duty. LAUSD also reports a workforce culture that expects temporary return to light duty after workplace injuries. However, LAUSD does not utilize a separate pay code, limiting its ability to track program metrics.

PEER AGENCY PROGRAM COMPARISON

Agency	Mandatory interactive process	Fill existing position or modify employee's current position, or provide alternative work	Mandatory acceptance of light-duty assignment	Can track metrics
City of Ventura	No, engage in IPM only at the employee's request	Either	Not applicable	?
City of L.A.	Yes	Fill existing vacancies only	No	Yes
L.A. Department of Public Works	Yes	Modified/ Alternative work	Yes	Yes
LAUSD	Yes	Modified/ Alternative work	Yes	No

KEY DIFFERENCES AND MISSED OPPORTUNITIES

When comparing Los Angeles County's DMC program with those of LAUSD and the City's Department of Public Works, a marked difference in emphasis is apparent. Peer agencies require departments to exhaust every available option to return injured workers to temporary light-duty assignments. Severe consequences are enforced if employees decline these offers.

At the City's Department of Public Works, employees who do not accept the light-duty offer within one week face termination of employment. At LAUSD, employees who do not return within 30 days post-offer are separated from the District and placed on a 39-month rehire list, as stipulated by their employment contract and the Education Code. In both agencies, employees understand that their departments will work to find meaningful work during their recovery process.

Within the County, the EEC task force observed that employees with work-related injuries are managed similarly to those with non-work-related injuries. This approach may result in DMCs missing statutory opportunities to encourage acceptance of temporary light-duty assignments among those with work-related injuries.

RECOMMENDATIONS

Recommendation 1: Establish a Separate Pay Code

The Auditor Controller should implement a separate pay code for light-duty assignments, allowing disability managers to track the success of temporary light-duty placements for injured workers. Without the ability to measure program outcomes, assessment is challenging. A dedicated pay code would facilitate effective program evaluation. After implementation, the EEC recommends revisiting the program for further evaluation.

Recommendation 2: Improve Access to Work Restriction Reports

DMCs should collaborate with workers' compensation claims adjusters to obtain timely work restriction reports from injured workers' physicians. Interviews revealed that sometimes injured workers decline light-duty offers, claiming their physician's restrictions do not reflect their actual abilities. In such cases, County DMCs request updated restrictions from the physician, but delays can disrupt the interactive process. The City's Department of Public Works allows a reasonable period for obtaining new restrictions and works with claims adjusters to support this process. Real consequences affecting an employee's benefits may encourage employees to participate and provide timely updates.

Recommendation 3: Incorporate Telework into Light Duty Assignment Development

The Auditor-Controller recently engaged KPMG to evaluate the County's telework practices and to identify best-practice approaches for remote work among County employees. The resulting report, titled "Strengthening the Los Angeles County Workforce," was presented to the Board of Supervisors on September 5, 2025.

https://file.lacounty.gov/SDSInter/auditor/audit_reports/1191483_2025-09-05StrengtheningtheLosAngelesCountyWorkforce_May21_2024_BoardAgendaItem6_.pdf

Prior to this report, the Economy and Efficiency Commission (EEC) released two evaluations focusing on telework: one dated July 8, 2021

(https://assets-us-01.kc-usercontent.com/0234f496-d2b7-00b6-17a4-b43e949b70a2/2cf97590-2156-4e96-a1b9-95dbf51edb93/204_HYBRID_Model.pdf)

and another dated June 1, 2023

(https://assets-us-01.kc-usercontent.com/0234f496-d2b7-00b6-17a4-b43e949b70a2/507ea5bc-61a6-4b9e-921d-afb0ac944f55/Hybrid%20Work%20Study%20-%20After%20the%20Pandemic.pdf.)

All three reports emphasize the advantages of hybrid virtual/in-person work arrangements for contemporary employees. According to the Auditor-Controller's findings, key factors motivating County personnel to participate in hybrid programs include reduced commute time and costs (68%), improved work-life balance (64%), enhanced productivity (57%), and health and safety considerations (39%). These reasons align with light-duty requirements regarding reasonable commuting and accommodation of workplace health and safety for injured employees.

It is recommended that hybrid temporary assignments be established to support light-duty work where feasible and where consistent with work unit culture and workflows.

Recommendation 4: Develop Transitional Light Duty Job Banks

DHR should explore establishing transitional light-duty job banks, ensuring alternative assignments are readily available when a modified assignment cannot be developed. The preferred method is to modify the employee's current position by removing tasks restricted by the physician. If modification is not feasible, developing an alternative assignment is the next best option. While the County's DMC program provides robust processes for both approaches, the time required to create alternative assignments can slow progress. Job banks could enhance efficiency by providing immediate options.
https://blog.reduceyourworkerscomp.com/2025/07/how-to-create-a-transitional-duty-job

Recommendation 5: Adopt a Board Policy on Temporary Light Duty Assignments

The Board of Supervisors should establish a policy requiring departments to return employees with work-related injuries to temporary light-duty assignments whenever feasible. Departmental and employee buy-in is essential for a successful disability management program, and a Board Policy would help create the necessary culture change observed in peer organizations' most effective programs.

ACKNOWLEDGMENT STATEMENT

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