

June 11, 2019

Harvey D. Fort
Acting Director
Division of Policy and Program Development
Office of Federal Contract Compliance Programs
Department of Labor
200 Constitution Ave. NW, Room C-3325
Washington, DC 20210

Re: Supply and Service Program Proposed Renewal of the Approval of Information Collection Requirements; Comment Request (published April 12, 2019)

Dear Mr. Fort:

The American Foundation for the Blind (AFB) is pleased to offer these comments regarding the proposed information collection for focused reviews of compliance with Section 503 of the Rehabilitation Act. AFB is a national nonprofit that strives to create a world of no limits for people who are blind or visually impaired by improving educational, employment, and aging opportunities.

Recognizing the continuing gap in employment for people who are blind or visually impaired compared to the population of people without disabilities and the role of Section 503 in establishing employment rights for people with disabilities working for federal contractors, we strongly support OFCCP's plan to conduct focused compliance reviews with Section 503. The information that OFCCP proposes to collect is critical for assessing compliance and does not unduly burden the entities from whom information will be collected. In addition to the proposed collection, we urge OFCCP to collect the following additional information that we believe would further improve the compliance evaluation:

- Information detailing the accessibility of a contractor's hiring platforms, including any online or electronic job application systems, and other information necessary to identify barriers to completing the application process.
- Information maintained by the contractor concerning the types of disabilities represented among the contractor's employees. While the Section 503 rule does not include goals or provisions relating to individuals with "targeted disabilities," such as the EEOC's subgoal for individuals with targeted disabilities, it is important for OFCCP to ensure that Section 503 affords opportunities to individuals with the types of disabilities that historically have been significantly underrepresented in the workforce.

- Information on the contractor's arrangements with disability services agencies, vocational rehabilitation agencies, employment networks, centers for independent living, and other such entities to assist (1) with recruitment of people with disabilities and (2) with identifying appropriate accommodations that may be needed by employees with disabilities.
- The contractor's policies concerning requests for leave as a reasonable accommodation, including leave that may extend beyond what the contractor offers as vacation and sick time and Family and Medical Leave Act time.

Thank you for the opportunity to comment on the proposed Section 503 Focused Reviews Scheduling Letter. This information collection is an important part of ensuring that people with disabilities are fully included in the workforce.

Sincerely,

Stacy Cervenka
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