



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

APR 11 2013

**MEMORANDUM FOR EXECUTIVE SECRETARIAT
US EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**

FROM: Mariam G. Harvey *MGH*
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(Civil Rights and Diversity)

SUBJECT: Demographic Information on Applicants, OMB No. 3046-0046

The Department of the Treasury fully supports the proposal by the Equal Employment Opportunity Commission (EEOC) to revise its form, "Demographic Information on Applicants, OMB No. 3046-0046," to include disability status data. The Department is pleased that the revised form uses expansive language and definitions for impairments. In particular, the Department notes that the proposed form allows applicants to self-identify as having a "Severe mobility impairment: For example, uses a wheelchair, scooter, walker or uses a leg brace to walk" rather than being limited to the terms "Full paralysis," "Partial paralysis," and "Mobility impairment" that are used by the Office of Personnel Management ("OPM") in the Standard Form 256, together with lengthy modifiers that require the condition be caused "by a brain, nerve or muscle impairment, palsy and cerebral palsy, multiple sclerosis, muscular dystrophy, congenital hip defects."

The Department notes that there are many reasons why people use a wheelchair, scooter, walker or leg brace, and persons who use the same mobility device present themselves in the same manner to a hiring official regardless of the underlying medical condition. The revised form correctly takes the focus off the medical condition and places it on the functional limitation.

The Department would be pleased if EEOC and OPM were to agree on a revised Standard Form 256 that used the terms and definitions in the proposed EEOC Applicant Form.