

Department of Navy Comments on the Notice of Information Collection – Revised: Demographic Information on Applicants for Federal Employment

The Department of the Navy (DON) is committed to equality of opportunity in federal employment, and acknowledges the particular challenges and barriers which remain for individuals with disabilities. For several years the DON has had an ongoing effort to identify and eliminate barriers to equality of opportunity for people with disabilities. The availability of demographic information on applicants with disabilities will assist our on-going barrier analysis efforts. We appreciate the opportunity to comment on the Equal Employment Opportunity Commission's (EEOC) proposed Notice of Information Collection.

The Notice of Information Collection states, "The questions on disability and medical impairments are designed to allow federal agencies and the EEOC to determine the percentage of applicants to Federal jobs who might be considered 'individuals with disabilities' under various approaches to defining the term. Among other things, the disability questions are designed to analyze the frequency with which people with 'targeted disabilities' apply for positions with an agency....The information obtained will be used by federal agencies only for evaluating whether an agency's recruitment activities are effectively reaching all segments of the relevant labor pool, to gauge progress and trends over time with respect to equal opportunity goals, and to track progress towards meeting the recruitment and hiring strategies developed pursuant to EO 13548."

In order to meet the objective of gauging progress and trends over time with respect to equal opportunity, track progress towards meeting recruitment and hiring strategies, and conduct appropriate barrier analysis into the hiring of individuals with disabilities, to include people with targeted disabilities, the information collected of applicants must mirror the information collected from employees on the Office of Personnel Management Standard Form 256 (SF 256).

It appears that the list of physical and mental conditions collected in section 5.A. of the Demographic Information on Applicants form are similar, but not identical, to the targeted/severe disabilities identified in the SF 256. The information collected in section 5.C. of the form appears to be similar to the list of non-targeted disabilities (Other disabilities) on the SF-256. If the collected information is intended for use by agencies in their barrier analysis efforts, it is essential that the information collected of applicants mirror the information collected of employee to ensure an appropriate comparison of both populations can be made.

The DON recommends that Section 5.A. of the Demographic Information on Applicants form be identical to Part I (Targeted/Severe Disabilities) of the SF-256. It is also recommended that Section 5.C. of the form be identical to Part II (Other Disabilities) of the SF-256.

For any questions on the above please contact: Edward Castellon at 202-685-6230 or at edward.castellon@navy.mil.