



Comment on FR Doc # 2016-25331

The is a Comment on the **Equal Employment Opportunity Commission (EEOC) Notice: Agency Information Collection Activities; Proposals, Submissions, and Approvals**

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Comment

How to Obtain Substantially More Accurate, Complete Estimates of Fed Applicants & Employees with Targeted Disabilities!

Less than 13% of Federal employees report a disability; less than 2% report a "severe" disability...Yet, US Census data (2010-2011 American Consumer Survey/ ACS) suggests about 19% of workforce-age population have a disability. Of 13% reporting a severe disability, 40% report multiple disabilities. About 83% of those reporting severe disabilities, have non-obvious types, i.e. don't use any visible assistive devices such as wheelchairs, canes, or crutches.

Thus, most applicants and employees with targeted disabilities will have non-obvious types. Most do not view themselves as "disabled" and are reluctant to label themselves as "disabled" in official records on either the "Demographic Information on Federal Job Applicants, OMB No. 3046-0046", or OPM's "Self Identification of Disability SF256 Form". Both forms discourage individuals from reporting their targeted disability status. Individuals can only be counted statistically as "targeted" if the individuals disclose their specific targeted disability. Neither form allows the individuals an option, for privacy purposes, of being counted as "targeted", by just reporting "I have one or more of the targeted disabilities listed I do not wish to disclose further". Given that their targeted disability is likely not obvious, employees are even less likely to stigmatize themselves in official records, when they must not only label themselves as "disabled" but also "voluntarily self-identify" their specific disability.

These forms' similar approach to documenting targeted disabilities have consistently proven ineffective, resulting in underreporting of targeted statuses by 50-75%! This ongoing ineffective documentation for the past 30+ years has disrespected the disability community, stifled disability diversity awareness, and unfairly branded federal government as being much less inclusive of disability diversity than we have been. Continued use of these forms' ineffective approach for documenting targeted disability outcomes also disrespects and stifles the efforts of federal agency outreach and recruitment professionals, and other selecting officials, when most of theirs and their agencies' successes in inclusion of individuals with targeted disabilities fail to get measured and can't be credited/reported.

The best way for Federal Government to fully respect privacy PLUS obtain and be credited most accurately and completely for what we are accomplishing in application, recruitment, and retention of individuals with targeted/other disabilities (as well as RNO/ERI, Gender, LGBT, and even veteran/disabled veteran's status), is to offer applicants and employees a way of anonymously reporting such, often sensitive, data. For example, over 7,500 employees of US Forest Service Units were offered the chance to anonymously report their diversity statuses through completing a "Supplemental Diversity Survey" via web. Over 5% reported targeted disability statuses (compared to 1% official rate). Higher rates were

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reported of RNO/ERI minority statuses, and 20-25% increases in the percent of employees reporting "veteran 30% or more disabled", and "disabled veteran" statuses. (Disabled Veterans often don't receive their final service-connected disability rating until after federal hire and have little impetus to update their records just for "statistical purposes". Such as anonymous Survey approach also enables agencies to obtain more candid measures and awareness of their workforce's LGBT representation.

If the OMB No. 3046-0046 (and OPM sf256) offer individuals with targeted disabilities concerned about their privacy at least the option of just reporting only that "I have one or more of the targeted disabilities listed I don't wish to further disclose", it is likely substantially more would be willing to report this data for statistical purposes. However, this approach will still not provide as accurate, complete, or candid a picture of federal applicants' and employees' disability and other diversities as would gathering the data anonymously and fully respecting and protecting their privacy. The Federal Viewpoint Survey is an example of how it is possible for Federal Government to obtain more candid, accurate data, including about its diversities, when offering those completing it the opportunity to provide their data anonymously.

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