



**CONSORTIUM FOR CITIZENS
WITH DISABILITIES**

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: Comments on Supply and Service Program Proposed
Renewal of the Approval of Information Collection
Requirements (published Apr. 12, 2019)**

Dear Mr. Fort:

The undersigned members of the Consortium of Citizens with Disabilities (CCD) Rights Task Force and Employment and Training Task Force submit these comments in response to the above-referenced request for comment on information collection requirements. Our comments concern the proposed information collection for focused reviews of compliance with Section 503 of the Rehabilitation Act. CCD is the largest coalition of national organizations working together to advocate for Federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

We strongly support OFCCP's plan to conduct focused reviews of compliance with Section 503. We believe the information that OFCCP is seeking to collect is critically important for assessing compliance. We urge OFCCP to collect the following additional information, which we think is also essential to determining whether contractors are complying with Section 503:

- 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. Flexible leave policies are one of the most important accommodations enabling people with disabilities to maintain employment.
- The contractor's arrangements with disability services agencies, vocational rehabilitation agencies, Employment Networks, centers for independent living, and other entities to

assist with recruitment of people with disabilities as well as with identifying appropriate accommodations that may be needed by employees with disabilities.

- The screening tools used by the contractor in the hiring process, including criminal background checks, credit checks, personality tests, and other screening tools that may screen out applicants with disabilities and may be unnecessary or overbroad.
- The contractor's policies and practices to promote retention of employees with disabilities and prevent the need for "disability retirement."
- Information about the accessibility of the contractor's workplaces and online platforms.
- 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," like the EEOC's subgoal for individuals with targeted disabilities in its regulations implementing Section 501, it is important for OFCCP to ensure that Section 503 affords opportunities to individuals with the types of disabilities that have historically been dramatically underrepresented in the workforce.

Thank you for the opportunity to comment on this information collection. As you know, increasing employment opportunities for people with disabilities expands the talent pool and benefits employers and society as well as people with disabilities.

Sincerely,

American Association of People with Disabilities

American Foundation for the Blind

American Network of Community Options and Resources

The Arc of the United States

Association of People Supporting Employment First

Autistic Self Advocacy Network

Bazelon Center for Mental Health Law

Center for Public Representation

Council of State Administrators of Vocational Rehabilitation

Disability Rights Education and Defense Fund

National Association of Councils on Developmental Disabilities

National Council on Independent Living

National Disability Institute

National Disability Rights Network

National Organization on Disability

Paralyzed Veterans of America

United Spinal Association