

OFCCP Proposes Changes to the Self-Identification of Disability Form

Government Contractor Compliance & Regulatory Update Blog on **October 7, 2019**

On October 3, 2019 OFCCP submitted a [request](#) to the Office of Management and Budget for approval of proposed changes to its Voluntary Self-Identification of Disability Form.

OFCCP explained that it had proposed the changes “in an effort to increase the response rate on the form.”

The proposed changes include:

- Removing the reasonable accommodation notice;
- Expanding the language under the “Why are you being asked to complete this form” section;
- Revising and alphabetizing the disability example list, including:
 - Adding autoimmune disorders, depression/anxiety, cardiovascular/heart disease, and gastrointestinal disorders to the list;
 - Adding broad categories of disability, such as “psychiatric conditions”, to consolidate previously individually listed disabilities like bipolar disorder and major depression.

OFCCP explains that it removed the reasonable accommodation notice because it was “not necessary to the information collection and created confusion among applicants and employees who thought that completing the form automatically referred them for a reasonable accommodation.” OFCCP described its other changes to the form as “softening the tone...to make the language more positive.”

The proposed voluntary self-identification form can be found [here](#). The current disability self-identification form, which does not expire until January 2020, can be found [here](#). Contractors may submit comments on the proposed changes through December 2, 2019.

Contractors have continually struggled with low response rates to disability self-identification forms, so any effort to encourage higher response rates is welcome. Even so, it is hard to see how these modest changes will, on their own, have much of an impact on response rates.

[View Original](#)

[Related Professionals](#)

- **Guy Brenner**

Partner