



Commemorating 40 Years
Of Disability Advocacy
1973-2013

April 16, 2013

Bernadette Wilson
Executive Officer
Executive Secretariat
Equal Employment Opportunity Commission
131 M Street, NE
Washington DC 20507

Re: Notice of Information Collection – Revised: Demographic Information on Applicants for Federal Employment

Dear Ms. Wilson:

On behalf of the Rights Task Force of the Consortium for Citizens with Disabilities (CCD), we submit these comments in response to the Notice of Information Collection concerning the EEOC's OMB 3046-0046 form. The Consortium for Citizens with Disabilities is a coalition of national disability-related organizations working together to advocate for national public policy that ensures full equality, self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society.

The Rights Task Force strongly supports the Commission's proposal to revise form OMB 3046-0046 to collect information about federal agency job applicants with disabilities. Collection of this information is an important tool in implementing the requirements of Executive Order 13548 to increase federal hiring of individuals with disabilities. Our comments on the form are as follows:

- (1) Several items listed under Section 5A use the term "severe." We urge you to use the word "significant" instead. The term "severe" is often associated with negative and stigmatizing views about disability, and many individuals with disabilities are unlikely to identify themselves as having a "severe" condition or impairment.
- (2) We urge you to list simply "intellectual disability" rather than "severe intellectual disability." While individuals with intellectual disabilities may experience a variety of limitations, all intellectual disabilities are characterized by impairments in functioning that are sufficiently significant to warrant inclusion as targeted disabilities.

- (3) The item listing bipolar disorder, schizophrenia, PTSD, and major depression should refer to these as “psychiatric” rather than “psychological” disorders.
- (4) The questions in Section 5B, derived from the American Community Survey, focus on a very discrete set of activities and are insufficient, by themselves, to identify many individuals with disabilities who experience other types of functional limitations. We urge to you add an additional box to Section 5B stating: “difficulty with everyday activities such as interacting with others, thinking, preparing food, taking medications, or managing finances.”

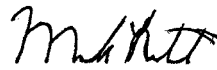
We appreciate the opportunity to comment on the proposed rule.

Sincerely yours,

CCD Rights Co-Chairs
On behalf of CCD Rights Task Force



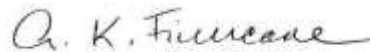
Jennifer Mathis
Bazelon Center for Mental Health Law



Mark Richert
American Foundation for the Blind



Curt Decker
National Disability Rights Network



Sandy Finucane
Epilepsy Foundation of America