

One Minute Memo®



Updated: OMB Renews Disability Self-ID Form Required for Federal Contractors and Subcontractors

By Annette Tyman and Michael Childers

Seyfarth Synopsis: On January 31, 2017, the Office of Management and Budget (“OMB”) renewed the disability self-ID form. The form was set to expire. However, OMB’s action extends the self-ID form’s expiration date to January 31, 2020. Federal contractors and subcontractors subject to Section 503 of the Rehabilitation Act of 1973 should begin using the renewed form as soon as possible.

On Tuesday, the Office of Management and Budget (“OMB”) renewed the self-identification of disability form that it originally approved as part of the updates that the Office of Federal Contract Compliance Programs (“OFCCP”) made to Section 503 of the Rehabilitation Act of 1973 (“Section 503”). This renewal means that employers doing business with the federal government are expected to continue soliciting disability information and that going forward, they will need to do so using the newly approved form.

What Does Section 503 Require?

Under Section 503, employers with 50 or more employees that perform work on federal contracts in excess of \$50,000, are required to invite applicants (pre and post-offer) and employees to self-identify their disability status. Contractors with 100 employees or more are required to summarize their employees’ responses in each job group that they have created as part of their written affirmative action plan and compare their current disability utilization against the annual utilization goal established by the OFCCP while those with fewer than 100 employees may simply measure the disability utilization throughout their total workforce against the OFCCP utilization goal. Section 503 also requires contractors to summarize applicant self-identification responses.

What Does The Renewal Mean for Contractors?

There were no substantive changes made to the disability self-identification form. The only portion which was updated was the expiration date, which now terminates on January 31, 2020. The new form can be located using the following link:

https://www.dol.gov/ofccp/regs/compliance/sec503/Self_ID_Forms/VoluntarySelf-ID_CC-305_ENG_JRF_QA_508c.pdf

As with the previous iteration, contractors may not alter its content in any way. Contractors may however create an electronically fillable copy of the form for easier integration into their application process provided that the electronic form complies with the following specifications:

- Display the OMB number and expiration date;
- Contain the text of the form without alteration;
- Use a sans-serif font, such as Calibri or Arial; and
- Use at least 11-pitch for font size (with the exception of the footnote and burden statement, which must be at least 10-pitch in size).

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If you would like additional information, please contact your Seyfarth attorney, [Annette Tyman](mailto:atyman@seyfarth.com) at atyman@seyfarth.com, or [Michael Childers](mailto:mchilders@seyfarth.com) at mchilders@seyfarth.com.

www.seyfarth.com



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