

One Minute Memo®



Additional Information for Implementing the Renewed Disability Self-ID Form

By Annette Tyman and Michael Childers

Seyfarth Synopsis: Federal Contractors should immediately update the Disability Self-ID Form to include the new expiration date. The OFCCP is allowing a 10-day grace period, until February 10th to update the form.

Last week we updated contractors on OMB's renewal of the disability self-identification form ([see post here](#)). Note that there were no substantive changes to the form and that the only change was an update to the effective date from January 31, 2017 until January 31, 2020. Since that update, we have learned that the OFCCP is expecting contractors to "immediately" take steps to update the form to reflect the new effective date. For those contractors who need additional time to update the expiration date, the National Office has implemented a 10-day "grace period." For unexplained reasons, the OFCCP has not publicized this deadline on its website. Nonetheless, contractors should take immediate steps to update the disability self-ID form with the new effective date and implement the change by February 10th.

To ensure the updated form is in use, contractors should take the following steps:

- Update online application systems to ensure that they are displaying the self-ID form with the new effective date.
- Update new hire onboarding systems to ensure that these materials include the updated form, including updating paper copies that may be utilized.
- Ensure that the updated form is used in interim reminders to employees of their option to update their disability status.
- Ensure that the updated form is used in any resurvey of the workforce.
- For those contractors who are currently subject to a compliance review, ensure that you can demonstrate that you have implemented the updated form or readily show the steps that you have taken to transition to the updated form.

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

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compliance needs.

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