



AUG 27 2014

MEMORANDUM TO THE Office of Information and Regulatory Analysis
Office of Management and Budget

FROM: DEBRA CARR
Director of Policy
Office of Federal Contract Compliance Programs

SUBJECT: Information Collection Request (ICR) 1250-0005: OFCCP
Recordkeeping and Reporting Requirements - Section 503 of the
Rehabilitation Act of 1973, as amended, 29 U.S.C. 703, Voluntary
Self-Identification of Disability Form

The Office of Federal Contract Compliance Programs (OFCCP) is seeking the approval of the Office of Management and Budget (OMB) to implement two non-material changes to the Voluntary Self-Identification of Disability form (CC-305) related to implementing provisions of Section 503 of the Rehabilitation Act of 1973. The first change is to reproduce the previously approved form CC-305 in seven additional languages, and the second is to make the form available in English and Spanish using a dropdown menu format, rather than the existing checkbox or radio button format.

On January 22, 2014, OMB approved the CC-305 in Word format in English. For posting on the Internet, OFCCP converted this form to a fillable electronic format to prevent material alteration, but allowed contractors to reproduce the form for their use so long as they followed the guidelines approved by the agency and as previously submitted by the agency to OMB by way of one or more Frequently Asked Questions. Since posting the electronic version of the form in English and Spanish,¹ OFCCP received several requests from federal contractors to make the self-identification form available in alternate languages.

In order to meet these requests, OFCCP seeks approval to make these alternate language formats available to federal contractors and subcontractors. The alternate language formats do not alter the content or make any substantive changes to the form approved by OMB on January 22, 2014. OFCCP retained an outside vendor to professionally translate the CC-305 form in the alternate languages. Attached please find the CC-305 form in:

- German Word and German fillable PDF;
- Russian Word and Russian fillable PDF;

¹ OMB approved the Spanish version of form CC-305 on March 07, 2014.

- French Word; and French fillable PDF;
- Chinese Traditional Word and Chinese fillable PDF;
- Japanese Word and Japanese fillable PDF;
- Korean Word and Korean fillable PDF; and
- Chinese Standard Word and Chinese Standard fillable PDF

OFCCP also received requests to permit contractors that are electronically reproducing the form to use a dropdown menu format, rather than the checkbox or radio button format currently permitted. To respond to these requests, OFCCP seeks approval to make such an alternate format available in English and Spanish.

OFCCP explored two options for this alternate. The first option is using a dropdown box, in place of the checkboxes, with the same three possible responses that appear on the CC-305 form. The second option is to add the question “Do you have a disability?” next to the dropdown box before the three possible responses currently on the approved form. The three response options are:

- Yes, I have a disability (or previously had a disability)
- No, I don’t have a disability
- I don’t wish to answer

After consideration, OFCCP prefers the latter option. OFCCP considers the addition of the question to be a non-material change, but one that is warranted for clarity once the form is reformatted to use dropdowns. Specifically, we are concerned that, because the dropdown box immediately follows the non-exhaustive list of disabilities, without the question some responders may believe that the dropdown menu will ask them to identify which listed disability they have and be deterred from responding. A mock-up of the CC-305 with a dropdown menu and the question “Do you have a disability?” is attached.

Attachments (15)