



Disability Self-Identification: A Guide for Apprenticeship Sponsors

To promote the inclusion of more individuals with disabilities in apprenticeship programs, the apprenticeship Equal Employment Opportunity (EEO) regulations set a national aspirational goal of 7% for participation by qualified individuals with disabilities in Registered Apprenticeship programs. This is only a benchmark – not a requirement for each apprenticeship sponsor. This goal is consistent with the goal established by the U.S. Department of Labor (US DOL) Office of Federal Contract Compliance Programs (OFCCP) that already applies to federal contractors and subcontractors.

By the deadlines described below, all Registered Apprenticeship sponsors required to develop an Affirmative Action Plan (generally, those with five or more apprentices) must begin inviting each apprentice and applicant for apprenticeship to self-identify as an individual with a disability.

WHAT DOES IT MEAN TO HAVE SOMEONE IDENTIFY AS AN INDIVIDUAL WITH A DISABILITY?

WHAT DO SPONSORS NEED TO DO?

Self-identification as an individual with a disability refers to an individual's voluntary disclosure of whether or not he or she has a disability. This does not mean identifying any particular disability that the individual might have, but rather, simply whether or not he or she has a disability. Individuals also have the opportunity to indicate that they would rather not respond.

To track progress toward the national 7% goal, those sponsors required to develop an Affirmative Action Plan will need to identify how many apprentices with disabilities are in their programs. They do this by inviting apprentices and applicants to voluntarily self-identify as having a disability or not. Sponsors will also need to track how many applicants with disabilities have applied to their programs.

HOW DO SPONSORS GATHER DISABILITY SELF-IDENTIFICATION INFORMATION?

Registered Apprenticeship sponsors must use the US DOL [voluntary disclosure form](#) to invite all applicants and apprentices to self-identify. Sponsors must extend the invitation to self-identify to all apprentices and applicants, not just those whom the sponsor believes may have a disability. The form may be given to an applicant or apprentice in person or may be completed online, using an [electronically fillable version](#) of the form. The voluntary disclosure form asks individuals to indicate whether or not they have a disability – not what type or severity of disability they may have.

When apprentices are accepted into the program, sponsors may use Form 671, the Program Registration and Apprenticeship Agreement, to invite them to self-identify as an individual with a disability. Section II, Part A of that form is the same as the Voluntary Disability Disclosure Form. Sponsors also use Form 671 to collect other information about incoming apprentices, such as their sex, race, and ethnicity.

HOW DO SPONSORS SAFEGUARD APPRENTICES' AND APPLICANTS' DISABILITY INFORMATION?

The voluntary disclosure form may be included as a part of the apprenticeship application and on-boarding packages; however, completed forms must be maintained in a confidential file separate from personnel files. Similarly, the voluntary disclosure forms may not be provided to officials involved with interviewing, testing, hiring, supervising, or assigning applicants, to guard against selection officials using disability information in their hiring, completion, or other programmatic decisions.

WHEN DO SPONSORS OFFER THE OPPORTUNITY FOR DISABILITY SELF-IDENTIFICATION?

Sponsors must offer applicants for apprenticeship programs the opportunity to self-identify as an individual with a disability at two stages in the hiring process: 1) when they apply for a program, and 2) once accepted into a program but before they begin their apprenticeship. Apprentices in an existing registered apprenticeship program must be invited to complete the voluntary disclosure form one time when this requirement goes into effect for them. All apprentices must also be reminded yearly that they may voluntarily update their disability status.

DO SPONSORS ENTER VOLUNTARY SELF-IDENTIFICATION INFORMATION INTO RAPIDS?

Sponsors using the RAPIDS data system are urged to enter the information obtained from applicants and apprentices (Yes, No, or I Don't Wish to Answer) into the system. RAPIDS now includes fields for this information.

Deadlines to Begin Offering Self-Identification

The disability self-identification requirement goes into effect on the following dates:

PROGRAMS REGISTERED WITH THE US DOL OFFICE OF APPRENTICESHIP:

- » January 18, 2019; **OR**
- » Two years from the date of program registration – whichever is later

PROGRAMS REGISTERED WITH A STATE APPRENTICESHIP AGENCY:

Contact your [State Apprenticeship Agency](#) to determine when your self-identification requirement goes into effect.

Best Practices for Sponsors Regarding Disability Self-Identification

Here are a few things for sponsors to keep in mind as they offer applicants and apprentices the opportunity to self-identify a disability:

- It is a best practice to give people a chance to fill out the form privately.
- Many disabilities may not require any type of accommodation at work, but let applicants and apprentices know they can request a reasonable accommodation if necessary. It is recommended that sponsors provide information about reasonable accommodations at the time an individual is hired into an apprenticeship program and completes the voluntary self-identification form.
- For the annual reminder to apprentices that they can update their status, it is a best practice to supply apprentices with a copy of their prior voluntary disclosure form.

Additional Information About Disability Self-Identification

- Video: Disability Inclusion Starts with You - www.dol.gov/ofccp/SelfIdVideo.html
- FAQs on Disability Self-Disclosure - www.dol.gov/ofccp/regs/compliance/faqs/503_faq.htm
- Building an Inclusive Environment that Encourages Self-Identification - www.dol.gov/ofccp/regs/compliance/resources_selfid.htm
- Best Practices that Encourage Self-Identification - www.askearn.org/topics/federal-contractor-requirements/encouraging-self-identification

