Stakeholder Engagement in Redesigning the Current Population Survey Disability Supplement

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OFFICE OF DISABILITY EMPLOYMENT POLICY UNITED STATES DEPARTMENT OF LABOR

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About ODEP

ODEP is the only non-regulatory federal agency that promotes policies and coordinates with employers and all levels of government to increase workplace success for people with disabilities. ODEP's mission is to develop and influence policies and practices that increase the number and quality of employment opportunities for people with disabilities. For more information, please visit the ODEP website at dol.gov/agencies/odep.

About CEO

CEO is an independent, department-level office located in the Office of the Assistant Secretary for Policy, supporting all of DOL in developing and disseminating credible information and data about DOL programs, policies, operations, and activities, using scientific methods. For more information, please visit the CEO website at dol.gov/agencies/oasp/evaluation/.

Summary

This report outlines an initiative led by the U.S. Department of Labor's (DOL) Office of Disability Employment Policy (ODEP) and Chief Evaluation Office (CEO), in collaboration with the Bureau of Labor Statistics (BLS), to enhance the Current Population Survey Disability Supplement (CPS-D) and address limitations in capturing the labor market experiences of people with disabilities. It synthesizes stakeholder engagement efforts, spanning listening sessions, public feedback, and expert input, to inform the redesign of the 2024 CPS-D. The key areas covered include feedback on disability employment and measurement topics, a strategic redesign plan for the CPS-D, and the identified priorities for the forthcoming survey. The redesign prioritizes three critical topics within the CPS-D: addressing work-limiting health conditions and capturing a broader range of disabilities, workplace accommodations, and challenges in finding and maintaining employment. Ongoing efforts focus on incorporating the redesigned CPS-D into the July 2024 Current Population Survey and continuing research on key disability employment topics.

Disability Data Series

The Disability Data Series features a collection of papers employing qualitative and quantitative approaches to explore crucial aspects of disability data. The goal of the series is to spotlight disability data collection efforts, utilization, and shed light on key disability employment topics to inform policy decisions.

1. Introduction

There is a need for quality data on the labor market experiences of people with disabilities to better inform policies designed to improve their employment outcomes. The primary source of labor force statistics in the United States is the Current Population Survey (CPS), which has included a set of six questions to identify people with disabilities (6Qs) since 2008.^{1,2} These questions allow researchers to assess the labor market outcomes of disabled people, but they do not address specific challenges faced by people with disabilities in obtaining and maintaining employment.³ Additionally, there is evidence that the 6Qs may not be effective in identifying people with certain disabilities, which reduces the ability of researchers to identify and assess their outcomes.⁴

To improve our understanding of the issues facing people with disabilities in the labor market, ODEP and CEO led an initiative, in collaboration with BLS, to collect data through a supplement to the CPS. As part of this effort, ODEP and CEO engaged numerous stakeholders to solicit feedback on the type of information that may be most valuable to include and to inform its general disability employment research agenda. This report summarizes the stakeholder engagement during this process.

ODEP and CEO previously collaborated to collect data on the labor market experiences of people with disabilities by sponsoring a CPS-D in May 2012, July 2019, and July 2021. Each of the three CPS Disability Supplements fielded included the same set of questions, which were initially developed for the 2012 CPS-D,⁵ and addressed disability employment topics such as:

- Why are the labor force participation rates of people with disabilities lower than those of people without disabilities?
- What are the work histories of disabled people?
- What are the barriers to work for disabled people?
- Which workplace accommodations assist disabled people?
- How do people with disabilities utilize programs that prepare them for employment and/or provide financial assistance?

The next CPS-D will be fielded in July 2024, and ODEP determined that it was a valuable opportunity to redesign the questions. There have been technological advances and changes in work structures since the development of the 6Qs used to identify people with disabilities nearly 20 years ago and the questions

¹ The CPS is sponsored jointly by the U.S. Census Bureau and BLS. It was first fielded in 1940 and is a nationally representative household survey and approximately 60,000 households are available for interview each month. The CPS is the source of the national unemployment rate, along with a wide range of information about employment, unemployment, and people not in the labor force. The CPS also collects extensive demographic data. More information can be found at https://www.bls.gov/cps/.

² For background on the development of disability questions for the CPS, see Terence M. McMenamin and Steven F. Hipple, "The development of questions on disability for the Current Population Survey," *Monthly Labor Review*, U.S. Bureau of Labor Statistics, April 2014, https://doi.org/10.21916/mlr.2015.15. See Section 3 for further details on the six disability questions.

³ We alternate between person-first phrasing ("people with disabilities") and identify-first phrasing ("disabled people") because some parts of the disability community prefer the latter.

⁴ Hall, Jean P., Noell K. Kurth, Catherine Ipsen, Andrew Myers, and Kelsey Goddard. 2022. "Comparing Measures of Functional Difficulty with Self-Identified Disability: Implications for Health Policy." *Health Affairs* 41 (10): 1433-41.

⁵ The July 2019 CPS-D is provided for reference: https://www2.census.gov/programs-surveys/cps/techdocs/cpsjul19.pdf.

developed for previous versions of the CPS-D 12 years ago. These advances and changes may impact how people perceive their abilities and experiences in the labor market.

Between October 2021 and May 2022, ODEP and CEO held five listening sessions that engaged a variety of stakeholders to provide input on the redesign. In total, these sessions assembled 36 disability employment experts, representing 12 federal agencies, 9 disability advocacy organizations, 5 universities, and 2 research organizations. ODEP also solicited comments from the public via a Request for Information (RFI) issued in June 2022. Comments received through the RFI came from individuals and groups representing various disability interests.

Listening session participants were not constrained in the topics of discussion, but the sessions were framed by facilitators to address two broad areas of interest:

- 1. **Disability Employment Topics** including opportunities to refine questions on the prior version of the CPS-D, as well as emerging topics of interest (Section 2).
- 2. **Disability Measurement Survey Questions** including an assessment of how well the 6Qs in the CPS basic monthly survey identify people with disabilities, and opportunities to modernize language or add new questions that reflect the evolving nature of disability (Section 3).

This paper summarizes the content and counts of distinct topics discussed by stakeholders related to both disability employment and disability measurement survey questions from the listening sessions and RFI to document the engagement during the redesign of the 2024 CPS-D. Brief summaries of the discussions are presented by topic and aim to communicate key takeaways without being comprehensive. The summaries do not include additional commentary as to the relevance, feasibilty, or impact of the specific ideas.

The rest of the paper is organized as follows:

- Section 2 summarizes stakeholder comments on disability employment issues.
- Section 3 introduces the 6Qs in the CPS basic survey and summarizes comments received on disability measurement survey questions.
- Section 4 provides an overview of the disability employment and measurement topics selected for the revised CPS-D in July 2024.
- Section 5 discusses next steps.

2. Disability Employment Topics

This section summarizes comments on disability employment topics from discussions with stakeholder groups and through the public RFI. Stakeholders are grouped into four categories: 1) Subject Matter Experts, 2) Federal Partners, 3) Disability Advocacy Organizations, and 4) the Public (through the RFI). Comments from each listening session and the public RFI were grouped into one of eleven topic areas: *Challenges to Employment, Job Accommodations, Work Disability, Telework, Career Assistance Programs, Public Assistance*

⁶ The public Request for Information (RFI) was open to general public comment and is available at https://www.federalregister.gov/documents/2022/06/24/2022-13481/request-for-information-on-current-population-survey-disability-supplement-2024.

Programs, Self-Employment and Nontraditional Work Arrangements, COVID-19, People without Disabilities, Work History, and Apprenticeships.

Similar comments on a particular topic made multiple times within a stakeholder group's discussion were only counted once. This approach is meant to identify distinct categories of comments but does not indicate the depth of the conversation or the emphasis on a particular topic. Topics discussed in great depth were often associated with many distinct comments.

Table 1 summarizes the total number of distinct comments by stakeholder group and topic. Overall, stakeholders made approximately 189 distinct comments on the 11 disability employment topics described above, and more than half of the comments were related to *Challenges to Employment*, *Job Accommodations*, and *Work Disability*.

Table 1: Comments on Disability Employment Topics, by Stakeholder Group and Topic

| Topics | Subject Matter Experts | Federal Partners | Advocacy Organizations | Public (RFI) | Total |
|--|------------------------------|---------------------|---------------------------|-----------------|-------|
| Challenges to Employment | 18 | - | 5 | 26 | 49 |
| Job Accommodations | 5 | 8 | 1 | 24 | 38 |
| Work Disability | 9 | - | 4 | 8 | 21 |
| Telework | 5 | 1 | 3 | 11 | 20 |
| Career Assistance Programs | 5 | 3 | 2 | 9 | 19 |
| Public Assistance Programs | 2 | - | - | 9 | 11 |
| Self-Employment and Nontraditional Work Arrangements | 7 | - | - | 2 | 9 |
| COVID-19 | - | - | - | 9 | 9 |
| People without Disabilities | 6 | - | - | - | 6 |
| Work History | - | - | - | 5 | 5 |
| Apprenticeships | 2 | - | - | - | 2 |
| Total | 59 | 12 | 15 | 103 | 189 |

Notes: Comments are categorized by topic area, and the above totals refer to the number of *distinct* comments within a stakeholder group.

Challenges to Employment includes comments that reference challenges and barriers to employment faced by unemployed respondents in finding work and by employed respondents in maintaining employment. The CPS-D, as last fielded in July 2021, included a question asking people with disabilities who were not employed whether they faced barriers to employment. Stakeholders commented that it is important to know why disabled people are working at relatively low rates compared to people without disabilities, as well as obtain information on the types of challenges that employed people with disabilities have overcome to be successful in finding and maintaining employment. As such, it was suggested that everyone, regardless of disability or employment status, should be asked about challenges to employment. One commenter suggested that the term "barrier" (as was used in the previous CPS-D) is negative and said that asking whether people "overcame challenges" would be more effective. Additionally, stakeholders noted that there is limited information on perceived discrimination faced by people with disabilities in finding and maintaining employment, as well as in professional development.

Job Accommodations includes comments regarding adjustments to a work environment that make it possible for workers to perform their duties, as well as comments on disclosing disabilities in the workplace. The CPS-D, as last fielded, asked of all employed people whether they have ever requested a change in their workplace to help them do their job better, and, if so, asked a follow-up question about what change was requested. Commenters suggested asking whether employers provided respondents with assistance after recent onset of disability and, if so, what this assistance entailed. It was also noted that there is a lack of information related to the costs of job accommodations and the costs associated with litigation related to reasonable accommodation disputes.

Work Disability includes comments about work-limiting health conditions. Commenters suggested including questions asking about difficulties completing current work duties or an inability to work, and the causes of those difficulties. In addition, commenters recommended the CPS-D identify different types of work disabilities as well as disability onset, frequency, and severity. They noted that it would be beneficial to assess whether the onset was relatively recent, if the disability was caused by a discrete event, and whether respondents have chronic or lifelong conditions. The CPS-D, as last fielded, did not include questions asking respondents about work disability or disability onset.

Telework includes comments related to telework, remote work, and broadband access. Commenters noted that these alternative methods of connecting workers to workplaces are worth studying further because they may include advantages and disadvantages that are specific to disabled workers. Commenters suggested asking respondents if they telework and whether that flexibility is available to them at their current employer. It was noted that disabled people may disproportionately benefit from telework, and as remote job opportunities grow, it will be important to understand accessibility barriers, including broadband access, to ensure people with disabilities are not left behind. The CPS-D, as last fielded, included questions that identify people who work at home and those with flexible work hours.

Career Assistance Programs includes comments about questions regarding use of career assistance programs or other employment programs (e.g., One Stop Career Centers) and whether they perceived these programs to be effective. The CPS-D, as last fielded, includes a question that asks respondents with disabilities if they have received career assistance from various sources in the past five years. Some participants noted that respondents might only be familiar with the third-party contractors that administer these programs, such as Goodwill, and not the official names of the underlying programs, which the questions in previous versions of the CPS-D refer to (e.g., Centers for Independent Living). Since commenters believe participants may not recognize the names of the programs they have utilized, they instead suggest asking about the specific types of services needed or used.

Public Assistance Programs includes comments that requested more details on respondents' use of public assistance programs, which provide cash assistance or in-kind benefits to individuals and families from a governmental entity. The CPS-D, as last fielded, includes a question, asked of all respondents, regarding whether or not they have received financial assistance from various public programs in the past year and, if yes, whether receiving the assistance caused them to work less than they would have otherwise. Stakeholders noted that fear of benefit loss may be one reason people with disabilities may not enter or reenter the workforce. This is particularly true of people receiving benefits through Supplemental Security Income (SSI) or

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⁷ Common definitions of public assistance programs are available at https://www.census.gov/topics/income-poverty/public-assistance/about.html.

Social Security Disability Insurance (SSDI). One commenter suggested adding a question asking whether the respondent was deemed eligible for either program.

Self-Employment and Nontraditional Work Arrangements includes comments relating to self-employment, temporary employment, gig work, contracting, and entrepreneurship. The last fielded CPS-D included a question asked of all employed people, to determine if their job was temporary. Commenters suggested that the question may not adequately capture gig workers. It was noted that there are many reasons disabled people participate in gig work and self-employment, and it would be helpful to include a follow-up question asking whether such work is by choice or necessity. Another commenter recommended including questions that assess respondents' access to capital, whether they engage in entrepreneurship, and if they have been successful in doing so.

COVID-19 includes comments about injuries, illnesses, and complications stemming from COVID-19. Multiple commenters recommended asking respondents whether their disabilities were caused by COVID and suggested that it would be helpful to capture the impact of long COVID on employment. These comments were exclusively provided in response to the RFI, rather than from specific stakeholder groups.

People without Disabilities includes comments that suggested the entire CPS-D be administered to both people with and without disabilities for the purpose of having a comparison group. This contrasts with the current structure in which some questions in the CPS-D are asked of people with disabilities and some are asked of people without regard to disability status (e.g. all employed people). Commenters suggested that survey data from people without disabilities would be helpful in identifying which employment challenges disproportionately impact people with disabilities. Similarly, commenters suggested that it might be useful to oversample people without labor market experience.

Work History includes comments about information on a respondent's prior employment and/or related experiences in the labor market. The last fielded CPS-D included a question asked of people with a disability who were not employed and had not already reported working before, regarding whether they had ever worked for pay at a job or business. One commenter emphasized the importance of knowing about respondents' work history, including the length of time of any employment gaps, which could be gathered through questions about a person's previous job experiences. This was suggested to provide context for stay-at-work/return-to-work issues. In addition, commenters recommended asking respondents if they have ever interviewed for positions offering subminimum wages, and if/how their disabilities may have impacted their opportunities for career advancement.

Apprenticeships includes comments related to apprenticeships. Subject matter experts agreed that the proportion of the population that completes apprenticeships is so small that analyses of survey responses would be limited by sample sizes. Since apprentices with disabilities represent an even smaller share of that population, the research utility of questions about apprenticeships within the CPS-D would be low. It was noted that the Registered Apprenticeship Partners Information Database System (RAPIDS) data would be more appropriate for studying this topic.⁸

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⁸ The Registered Apprenticeship Partners Information Database System (RAPIDS) database is administered by DOL's Employment and Training Administration (ETA). See: https://www.dol.gov/agencies/eta/apprenticeship/about/statistics/2021.

3. Disability Measurement Topics

3.1 Overview of the 6 Disability Questions in the CPS

The CPS, the American Community Survey (ACS), and the Survey of Income and Program Participation (SIPP) have used the 6Qs to identify people with disabilities since 2008.⁹ These questions appear in the CPS in the following format:

This month we want to learn about people who have physical, mental, or emotional conditions that cause serious difficulty with their daily activities. Please answer for all household members who are 15 years old or over.

- 1) Is anyone deaf or does anyone have serious difficulty hearing?
- 2) Is anyone blind or does anyone have serious difficulty seeing even when wearing glasses?
- 3) Because of a physical, mental, or emotional condition, does anyone have serious difficulty concentrating, remembering, or making decisions?
- 4) Does anyone have serious difficulty walking or climbing stairs?
- 5) Does anyone have difficulty dressing or bathing?
- 6) Because of a physical, mental, or emotional condition, does anyone have difficulty doing errands alone such as visiting a doctor's office or shopping?

The questions are dichotomous with yes/no response options, and people who respond "yes" to any one of the six questions are identified as having a disability. These questions enable the CPS, ACS, and SIPP to fulfill the requirement specified in Executive Order 13078 in 1998 to measure the employment status of people with disabilities in aggregate on a timely basis. The Executive Order did not require the identification or measurement of specific disabilities so these questions were not designed to identify people with specific disabilities. Rather, the 6Qs represent a minimum standard for survey questions on disability and are now used by most federal surveys to meet a requirement from the Affordable Care Act that established data collection standards for disability status and other demographic information.

Since these questions represent a minimum standard, it is natural that they may not identify the full population of disabled people. Accurately identifying all people with disabilities would require a series of

⁹ For background on the development of disability questions for the CPS, see Terence M. McMenamin and Steven F. Hipple, "The development of questions on disability for the Current Population Survey," *Monthly Labor Review*, U.S. Bureau of Labor Statistics, April 2014, https://doi.org/10.21916/mlr.2015.15. Details on the development of the six disability questions in the ACS can be found at https://www.census.gov/topics/health/disability/guidance/data-collection-acs.html, which links to a number of resources including a thorough report detailing the development: Brault, Mathew, Sharon Stern, and David Raglin, *Evaluation Report Covering Disability*, 2006 American Community Survey Content Test Report P.4, U.S. Census Bureau, January 2007, https://www.census.gov/content/dam/Census/library/working-papers/2007/acs/2007 Brault 01.pdf. Some nationally representative health survey started including the same set of six questions in a later year. For example, the Medical Expenditure Panel Survey started including this set of six questions in 2013.

¹⁰ In the ACS, CPS, and SIPP, one household member responds on behalf of all individuals in the household.

¹¹ Section 4302 of the Affordable Care Act requires the Secretary of the Department of Health and Human Services (HHS) to establish data collection standards for race, ethnicity, sex, primary language, and disability status. The law requires that, once established, these data collection standards be used, to the extent practicable, in all national population health surveys. The HHS Secretary established the six disability questions as the data collection standards for survey questions on disability. https://www.cdc.gov/ncbddd/disabilityandhealth/datasets.html

questions that is longer than what nationally representative surveys can typically afford. ¹² For example, Hall et al. (2022) uses data from the National Survey on Health and Disability (NSHD) to compare the share of people who self-reported disabilities through NSHD questions with the share of people with disabilities identified by the 6Qs. ¹³ Their findings show that 20 percent of people who self-reported any of the 7 categories of disabilities through NSHD questions (physical or mobility disability, mental illness or psychiatric, chronic illness or disease, neurological, sensory, developmental, and intellectual or cognitive) answered "no" to all of the 6Qs. This percentage was the highest among those with a chronic illness or disease (32 percent), followed by those with mental illness or a psychiatric condition (23 percent). Additionally, the 6Qs do not ask about difficulties communicating, which is asked about in the Washington Group Short Set on Functioning (WG-SS), a widely used alternate set of questions used to identify disabled people. ^{14, 15}

For reference, the WG-SS questions are listed below:

- 1) Do you have difficulty seeing, even if wearing glasses?
- 2) Do you have difficulty hearing, even if using a hearing aid(s)?
- 3) Do you have difficulty walking or climbing steps?
- 4) Do you have difficulty remembering or concentrating?
- 5) Do you have difficulty with self-care, such as washing all over or dressing?
- 6) Do you have difficulty communicating, for example understanding or being understood?

Each question in the WG-SS has these four response options:

- 1) No difficulty
- 2) Some difficutly
- 3) A lot of difficulty, and
- 4) Cannot do at all.

Identifying people with disabilities in data collection efforts is inherently challenging because of the multifaceted and evolving nature of disability. The definition of disability varies among people and is influenced by cultural, social, and contextual factors. What one person perceives as a disability might differ from another's interpretation, leading to inconsistent self-reporting. Additionally, the definition evolves over time based on changes in societal attitudes and advancements in assistive technologies, which further complicates measurement efforts. Since the 6Qs were developed nearly 20 years ago, many factors which may influence disability, including changes in work structures, may impact how people perceive their abilities and experiences in the labor market.

¹² BLS notes that health-focused surveys typically use dozens of questions to identify all people with disabilities, and that the relatively small number of disability-related questions in the CPS could fail to identify some people with disabilities (https://www.bls.gov/cps/cpsdisability_faq.htm).

¹³ Hall, Jean P., Noell K. Kurth, Catherine Ipsen, Andrew Myers, and Kelsey Goddard. 2022. "Comparing Measures of Functional Difficulty with Self-Identified Disability: Implications for Health Policy." *Health Affairs* 41 (10): 1433-41.

¹⁴ https://www.washingtongroup-disability.com/fileadmin/uploads/wg/Washington_Group_Questionnaire__1_- WG Short Set on Functioning October 2022 .pdf

¹⁵ The U.S. Census Bureau recently published a formal proposal to revise the disability questions in the ACS by adopting a modified verson of the WG-SS.

To address these concerns, ODEP and CEO solicited feedback from disability research experts, federal partners, disability advocacy organizations, and the general public on the perceived effectiveness and usefullness of the 6Qs and on potential disability measurement questions to add to the forthcoming CPS-D. Adding disability measurement questions to the CPS-D would provide new, relevant information for researchers and policymakers and also generate evidence that may be used to inform future debates regarding the effectiveness of the 6Qs. Any disability measurement questions included in the CPS-D would be in addition to the 6Qs included in the basic monthly CPS.

3.2 Stakeholder Feedback

This section summarizes feedback received on disability measurement topics. Comments identified as primarily referencing the 6Qs in the CPS basic survey were sorted into seven categories: *Broadening Groups of Disabilities; Work-Activity Limitations; Diversity, Equity, Inclusion, and Accessibility; Reluctance to Self-Identify; Changing Nature of Work;* and *Other Surveys*.

Table 2 reports the comments by category, sorted by stakeholder group. Overall, stakeholders made approximately 68 distinct comments on disability measurement in the CPS.

Table 2: Comments on Disability Measurement Topics, by Stakeholder Group and Topic

| Topics | Experts (SMEs) | Federal Partners | Advocacy Organizations | Public (RFI) | Total |
|---|----------------|---------------------|---------------------------|-----------------|-------|
| Broadening Groups of Disabilities | 10 | 10 | 3 | 7 | 30 |
| Mental Health/Cognitive Disorders | 5 | 1 | - | 6 | 12 |
| Work-Activity Limitations | 9 | 1 | 2 | 3 | 15 |
| Diversity, Equity, Inclusion, & Accessibility | - | 4 | 5 | - | 9 |
| Reluctance to Self-Identify | 1 | 4 | 2 | - | 7 |
| Changing Nature of Work | - | 4 | - | - | 4 |
| Other Surveys | - | 3 | - | - | 3 |
| Total | 20 | 26 | 12 | 10 | 68 |

Notes: Comments are categorized by topic area, and the above totals refer to the number of distinct comments within a stakeholder group.

Broadening Groups of Disabilities includes comments that the 6Qs are not identifying people with certain types of disabilities or functional difficulties. There was a general concern among stakeholders that the 6Qs were not broad enough to include some disabled respondents. Nearly half of all comments (12 out of 30) focused on how the 6Qs do not sufficiently identify people with mental health and cognitive disorders. Some recommended adding one question about mental health to try and capture that population and noted the importance of asking about frequency and intensity of episodes. Other recommendations were to include questions to help identify people with pain, fatigue, or an "other" category that respondents may use if they identify as having a disability but do not identify with the stated categories. It was also noted that the 6Qs do not identify individuals with communication difficulties. This topic contained the most comments overall of any disability measurement topic across all listening sessions.

Work-Activity Limitations includes comments focusing on work disabilities and activity limitations. Commenters noted that the current 6Qs, and corresponding employment information included in the CPS basic monthly, do not adequately measure the impact of a person's disability on employment and other daily

functions. Commenters suggested multiple alternatives to the yes/no question format. These included framing questions around limitations at work or other activities and/or allow respondents to answer on a scale (such as the scale used by the WG-SS). It was also noted that there is a benefit to identifying people at risk of disability to target and provide early intervention services that may prevent them from leaving the workforce.

Diversity, Equity, Inclusion, and Accessibility includes comments about needs and opportunities for better intersectional data on race, ethnicity, gender, and sexual identity of disabled workers. Additionally, commenters suggested it would be important to study to what extent workers with disabilities feel empowered to advance in their careers.

Reluctance to Self-Identify includes comments that the 6Qs do not effectively garner responses from people hesitant to self-identify as having a functional limitation that would constitute a disability. This could be due to stigma associated with identifying as disabled or a misunderstanding of what constitutes a disability. Comments also include suggestions on how to overcome these non-response issues, for example, with a question such as, "Have you ever been told by a clinician or educator that you have a disability?"

Changing Nature of Work includes comments on how traditional measurements of disability may need to be rethought considering technological impacts on both work and life that have made some activities more accessible. Job demands have evolved with the adoption of technologies in the workplace which may impact the relationship between work and disability. One commenter noted that recent declines in the number of people with disabilities on SSDI may be attributable to changes in the nature of work.

Other Surveys includes comments suggested that existing surveys, such as the Health and Retirement Study, SIPP, and 8-Item Short-Form Health Survey (SF-8)¹⁶ may be useful as references for developing questions to measure disability.

4. 2024 Current Population Survey Disability Supplement Topics

ODEP and CEO reviewed stakeholder comments and identified topics for inclusion in the CPS-D based on a combination of the frequency and depth of discussion, relevance to ODEP, CEO, and DOL's policy priorities, and an assessment of whether the information could be obtained from other sources. Topics that are frequently discussed by stakeholders in the disability community, aligned with ODEP/CEO/DOL priorities, and not readily available from other sources were selected as higher priority to be included in the CPS-D.

While several topics met these criteria, ultimately three topics were chosen for the 2024 CPS-D that adhered to general CPS supplement requirements. For instance, the subject matter must be in the public interest, appropriate for a government-run survey, compatible with the basic CPS survey, and not introduce a concept that could affect the accuracy of responses to the basic CPS information. Further, the subject matter must not be sensitive, and the inquiry must not slow down the work of the basic survey or impose a response burden that may affect future participation in the CPS basic survey. In general, the supplement questions must not add more than 10 minutes of interview time per household.

¹⁶ The 8-Item Short-Form Health Survey is an abbreviated version of the 36-Item Short-Form Health Survey (SF-36): https://www.rand.org/health-care/surveys tools/mos/36-item-short-form.html.

¹⁷ U.S. Census Bureau, *Current Population Survey Design and Methodology Technical Paper 77*, October 2019. https://www2.census.gov/programs-surveys/cps/methodology/CPS-Tech-Paper-77.pdf

After determining which topics to include in the revised CPS-D, ODEP and CEO worked closely with BLS to develop specific survey questions. BLS's survey experts guided the process to identify questions that addressed the key topics of interest, drawing upon previously validated and published questionnaires with support from economic studies and within the survey methodology literature, where possible. The questions had to meet several survey requirements as described above, and they had to be suitable to be read aloud by CPS interviewers and understood by the public. The process involved multiple rounds of review and cognitive testing of potential survey questions, which was all coordinated by BLS. The three topics covered by the revised CPS-D are described below. Specific questions from the revised CPS-D are reported in Appendix A.

1. Identifying people with a broader set of disabilities and those with work-limiting health conditions.

ODEP and CEO learned through the stakeholder engagement process that there is strong interest in understanding the relationship between disability and work, and there are concerns that the 6Qs are not identifying people with certain disabilities. For instance, in Section 2 (feedback on disability employment topics), work disability was the third most discussed topic and, similarly, work-activity limitations were the second most popular topic in Section 3 (feedback on disability measurement). The top two categories of interest based on the number of distinct comments were broadening groups of disabilities and work-activity limitations (Tables 1 & 2).

To address these issues, the revised CPS-D will include a series of questions assessing a broader range of disabilities and identify whether the respondent has work-limiting health conditions (questions 1-3 in Appendix A). The first question asks respondents if they have a health condition or difficulty that limits their ability to work. Respondents who answer yes will be asked to identify what most limits their ability to work:

- Visual or hearing impairment;
- Mobility impairment;
- Mental health condition;
- Cognitive, intellectual, or learning disability; or
- Other health condition.

Respondents would then be asked if any of their health conditions or difficulties are related to autism or long-term COVID-19 symptoms lasting 3 months or longer and whether their conditions are expected to last for more than 3 months. People who answer that they do not have a work-limiting condition or difficulty but answered yes to any of the 6Qs (indicating they are a person with a disability) will be asked the same set of questions.¹⁸

This revised CPS-D series of questions is unique because the questions will be asked of people with work-limiting conditions and those with a disability based on the 6Qs. There will be overlap between these two groups, but it will be possible to assess the magnitude of overlap and allow for the identification of three distinct groups of respondents: those with work-limiting conditions, those with a disability based on the 6Qs, and those with both (disability that limits their ability to work). Additionally, it will be possible to identify which response options may be more likely to capture people with work-limiting conditions but

¹⁸ Respondents who answered no to having a work-limiting health condition or difficulty but answered yes to one of the 6Qs will be asked to identify what causes them the most difficulty (rather than what most limits their ability to work).

not disability (e.g., mental health conditions; cognitive, intellectual, or leaning disability; or "other" health conditions), and vice-versa. This series will also produce estimates of the prevalence of autism and COVID-19 symptoms lasting more than 3 months (i.e., long COVID), across all 3 populations (with work-limiting conditions, with a disability, and with both).

In addition to providing a broader set of disability prevalence rates and more information on disability type, the revised series of questions will identify the portion of respondents who indicate their health condition or difficulty (work-limiting or not) is temporary and expected to last for less than three months.

2. Workplace accommodations.

Stakeholders made 38 distinct comments (Table 1) related to workplace accommodations, making it the second most-commented topic. Previous versions of the CPS-D included questions ascertaining if respondents had ever requested an accommodation in the workplace and, if so, the type of accommodation. Based on feedback from stakeholders and through the cognitive testing process, the revised CPS-D will include questions asking about workplace accommodations but with two key changes from previous versions.

First, the response options were updated and simplified (questions 4-5 in Appendix A). Response options that overlap between the previous and updated version of the CPS-D include the following accommodation requests: change in work tasks or schedule, new or modified equipment, increased access to workplace and building facilities (physical changes to the workplace), and training. The updated version will also include new response options: working from home and arranging special transportation. These updates address stakeholder comments and will provide insight into the types of accommodations requested in the workplace, by disability status, and whether the requests were granted or not.

Second, in the revised CPS-D, respondents will be asked a follow up question for each of the job changes requested, including whether the request was granted, either fully or partially (question 6 in Appendix A). These answers will provide critical information about the types of accommodations requested and which of those are more or less likely to be granted.

3. Challenges people with and without disabilities face in finding or keeping employment.

Stakeholders made 49 distinct comments about challenges to employment (Table 1), the most comments for any topic mentioned. The comments focused on the importance of having a better understanding of the challenges faced by respondents who are not employed to find a job, and challenges employed respondents have in doing their job.

Previous versions of the CPS-D included a question about barriers to employment that was asked of disabled people who were not employed. In the listening sessions, stakeholders noted the value of identifying these challenges for people with and without disabilities, which may include limited education or training, lack of transportation or childcare, inaccessible websites, potential loss of public assistance, and others. Based on this feedback, the revised CPS-D will include questions asking about employment challenges with updated response options. These questions will be asked of all respondents, including

people with and without disabilities (questions 7-8 in Appendix A). There will be different versions based on whether the respondent is employed or not.

In addition to changing the group of respondents who are asked this question, there were several other changes made in response to stakeholder feedback. First, rather than asking about "barriers" to employment, which may have negative connotations, the revised question asks about "challenges" in keeping or seeking employment. While many of the response options mirror those included in the previous CPS-D (own health condition or difficulty, limited education or training, lack of transportation, potential loss of public assistance, and employer or co-worker attitudes), there are new response options. For instance, respondents who are not employed will be able to respond that their challenge is related to a gap in work history. All respondents (employed or not) will also be able to indicate that their challenge in keeping or seeking employment is related to a lack of childcare, a lack of in-home personal care services, inaccessible websites, or due to discrimination.

5. Next Steps

ODEP will continue pursuing efforts to improve access to quality data to advance disability employment research that informs policymakers and other groups. While it was only feasible to include a limited set of topics in the revised CPS-D due to survey constraints, feedback during this process will be used to inform ODEP's disability employment research agenda.

For instance, stakeholders indicated strong interest in identifying all people who meet the defintion of disability under the Americans with Disabilities Act (ADA). To address this issue, ODEP will study the extent to which individuals with ADA-covered disabilities (specifically those with a physical or mental impairment that limits one or more major life activity) are covered by the 6Qs in the CPS and other federal surveys. 19

Additionally, ODEP will pursue other topics of interest discussed by stakeholders to assess impacts on people with disabilities and identify potential policy responses. These include issues related to the changing nature of work, the impact of work-from-home/telework policies and broadband access on employment outcomes, and the effectiveness of early-intervention policies aimed at improving the stay-at-work/return-to-work outcomes of people with a recent work-limiting injury or illness.

¹⁹ The ADA defines disability as a physical or mental impairment that limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment.

Appendix A: Proposed July 2024 CPS Disability Supplement Questions

NOTE: The 2024 CPS Disability Supplement has not been cleared through the Paperwork Reduction Act (PRA) clearance process. As such, the questions are subject to change.

The revised CPS-D consists of questions for people aged 16-75, covering three topic areas:

- **Disability Measurement** Identifying people with a broader set of disabilities, including health conditions that limit the amount or type of work they can engage in.
- **Requested Changes in the Workplace** Requests for accommodations at work and whether their employer granted their request.
- Employment Challenges Challenges respondents face with keeping or seeking employment.

The CPS-D questions will be asked in addition to questions in the basic monthly CPS, which includes the 6Qs.

A.1 Disability Measurement

The first set of questions focus on identifying people with a broader set of disabilities compared to the 6Qs, as well as those who have a health condition or difficulty that limits their ability to work.

Work-Limiting Health Condition or Difficulty

Question 1 will be asked of all adults aged 16-75, but it is phrased differently based on whether the respondent is in the labor force or not:

This month we would like to learn more about how people in different circumstances deal with work-related challenges.

- **1.** Do you have a health condition or difficulty that limits the kind or amount of paid work you could do?²⁰
 - o Yes
 - o No

Type of Work-Limiting Health Condition or Difficulty

All people who answer yes to question 1 will be asked questions 2 and 3. Additionally, respondents who answer no to question 1 but were identified as having a disability based on answering yes to any of the 6Qs included in the basic monthly CPS will also be asked questions 2 and 3.

- 2. Which of the following most limits the kind or amount of paid work you could do?²¹ (Select all that apply)
 - A visual or hearing impairment
 - A mobility impairment

²⁰ There is a variant of question 1 for people who are not in the labor force.

²¹ There is a variant of question 2 for people who are identified as having a disability on the monthly CPS, but are not identified as having a work-limiting health condition on the CPS-D.

- A mental health condition
- A cognitive, intellectual, or learning disability
- Other health condition or difficulty

Work-Limiting Condition or Difficulties Related to Autism

- 2.b Is the health condition or difficulty related to autism, or autism spectrum disorder?²²
 - Yes
 - o No

Work-Limiting Condition or Difficulties Related to Long COVID

- **2.c** Is the health condition or difficulty related to long-term COVID-19 symptoms lasting 3 months or longer?²³
 - Yes
 - o No

Identifying Temporary Conditions

- **3.** Is this health condition or difficulty a temporary one that is expected to last for less than three months?²⁴
 - o Yes
 - o No

A.2 Requested Changes in the Workplace

The second set of questions asks respondents if they have ever requested changes in their current job, the change or accommodation requested, as well as whether their employer granted the request. Question 4 will be asked of all wage and salary workers, unpaid workers in a family business, those whose class of worker status is unknown, and the self-employed. The question is phrased differently for people who are self-employed.

- **4**. Have you ever requested any change in your current job to help do your job better? For example, changes in work tasks, equipment, or schedule.²⁵
 - o Yes
 - o No

All people who answer yes to question 4 will be asked question 5.

- **5.** What changes did you request?²⁶
 - (Select all that apply)
 - Changes in schedule
 - Changes in work tasks

²² There is a variant of question 2b for people reporting multiple conditions in question 2.

²³ There is a variant of question 2c for people reporting multiple conditions in question 2.

²⁴ There is a variant of question 3 for people reporting multiple conditions in question 2.

²⁵ There is a variant of question 4 for the self-employed.

²⁶ There is a variant of question 5 for the self-employed.

- Training to learn new job skills
- Working from home (also known as telework)
- Increased access to workplace or building facilities
- Getting new or modified equipment
- Arranging special transportation
- Other changes

For each of the changes requested, the interviewer will ask question 6. Question 6 will not be asked of people who are self-employed.

- **6.** Was the request for [fill response from 5] granted fully, partially, or not at all?
 - Yes, fully
 - Yes, partially
 - Not at all

A.3 Employment Challenges

The final set of questions asks respondents about challenges keeping or seeking employment. Question 7 will be asked of all adults, but it is phrased differently based on whether the respondent currently has a job.

- 7. Are you facing challenges that could make it difficult for you to find a job?²⁷
 - Yes
 - o No

All people who say yes to question 7 will be asked question 8.

- **8.** Is the challenge related to:
 - (Select all that apply)
 - Own health condition or difficulty
 - Limited education or training
 - Gap in work history²⁸
 - Inaccessible websites
 - Lack of transportation
 - Lack of childcare
 - Lack of in-home personal care services
 - Potential loss of public assistance
 - Employer or co-worker attitudes
 - o Discrimination
 - o Other

²⁷ There is a variant of question 7 for people who currently have a job.

²⁸ The 'gap in work history' response option is only available for respondents who currently do not have a job.