



**CONSORTIUM FOR CITIZENS  
WITH DISABILITIES**

The Honorable Mick Mulvaney  
Director  
Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Dear Director Mulvaney and team,

On behalf of the Consortium for Citizens with Disabilities (CCD) Employment and Training Task Force, we write concerning the recently enacted Corona Virus Aid, Relief and Economic Security (CARES) Act and the possible adverse impact Section 3604 may have on the employment of federal employees with significant disabilities. CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration and inclusion of children and adults with disabilities in all aspects of society. The Employment and Training Task Force concerns itself with employment policies and work incentives affecting people with disabilities.

As you know, the federal government is a major employer of people with disabilities. According to a [2016 report](#) by the Office of Personnel Management (OPM) there are over 173,000 federal employees with disabilities across all different categories of disabilities. When you include veterans with service-connected disabilities, that number rises to over a quarter million employees. That means federal employees with disabilities represent 14.41 percent of the overall workforce. At the same time, veterans with disabilities also represent a significant part of the federal workforce with fully 19 percent of veterans with service-connected disabilities employed full time by federal agencies.

Section 3604 of the CARES Act allows OMB to exclude certain executive branch employees from the paid family and sick leave mandates contained in the law. While we recognize that this may provide the federal government with flexibility to retain critically needed personnel during this pandemic, we wish to highlight the heightened risk that many people with disabilities and preexisting conditions face from coronavirus. Paid leave and paid sick days show great potential to reduce the transmission of communicable diseases, preventing transmission to high-risk workers with disabilities. No one should have to choose between their job and taking care of

themselves or their family. We caution your office against adoption of policies that could adversely impact federal workers with disabilities.

Further, we are deeply worried about what efforts have been taken to ensure the safety and success of federal workers with disabilities throughout government. Throughout March, workers at various agencies such as [USPS](#) and the [Department of Veterans Affairs](#) reported insufficient safeguards or inadequate access to personal protective equipment (PPE). Given the CDC's reporting that over 90 percent of the most severe COVID cases involved individuals with underlying medical conditions, workers with disabilities have greater vulnerabilities.

The federal workforce implemented many more telework and remote work options as the pandemic worsened. As such, our Task Force is wondering what specific efforts were taken to ensure federal workers with disabilities were fully supported remotely. Our Task Force also wonders how requests for reasonable accommodations are being handled currently.

Lastly, as agencies consider in the near term moving back to physical office space and close proximity, do federal employees with disabilities have adequate access to PPE to ensure their health and wellbeing? What plans are being put in place to ensure federal workers with and without disabilities can access PPE when they have to return to their physical office spaces?

Any clarity or information about actions taken to protect federal workers with disabilities would be deeply appreciated. We would like to specifically request a written response or the opportunity to meet electronically to discuss these critical issues. Thank you very much for your attention and hard work.

Sincerely,

*Employment and Training TF:*  
Julie J. Christensen, PhD, LMSW  
Association of People Supporting  
Employment First (APSE)

Alicia Epstein  
SourceAmerica

Rie Kennedy-Lazotte  
National Association of State Directors  
of Developmental Disabilities Services

Philip Kahn-Pauli  
RespectAbility