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Editor  
Forbes Magazine

The Consortium for Citizens with Disabilities writes in response to the column by Bill Frezza in your March 6<sup>th</sup> edition titled "Is Your Company Ready to Meet Its New Disability Hiring Quota?" CCD is a coalition of more than 100 national disability rights, advocacy, consumer and provider organizations advocating on behalf of the nation's more than 54 million people with disabilities.

This column is so rife with inaccuracies, distortions and outdated views about the value of people with disabilities in the workplace that it begs for a response. Let us start with some of the more obvious errors in the piece. Mr. Frezza claims that regulations proposed by the Department of Labor will "impose, for the first time, numerical reporting and hiring quotas on employers." That is wrong. Companies seeking federal government contracts have, for decades, been required to set goals for and report on their recruitment and hiring of women and minorities.

The regulations in question seek to strengthen existing obligations by federal contractors to recruit and hire qualified individuals with disabilities. Sadly, the workforce participation rate for working age people with disabilities is 33 percent compared to 73 percent for those without a disability. While many public policies present barriers to work for people with disabilities, the ADA has yet to overcome entrenched resistance to employment of people with disabilities. For too long, employers have felt little urgency to employ people with disabilities. Equal Employment Opportunity Commission data indicate that employers have had a 95% success rate in contesting claims of employment discrimination under the ADA. Additionally, as noted above, federal contractors have been required for years to meet goals for employing women and minorities yet similar goals have not been required for employing people with disabilities. On the other hand, according to a 2011 Society for Human Resource Management survey, forty four percent of companies responding said that they include people with disabilities in their organization's diversity plans and policies. We do not believe it is asking too much for companies taking taxpayer dollars in the form of government contracts – and which employ almost one fifth of all individuals in this nation's economy -- to follow this lead with respect to their own workforces.

Mr. Frezza goes on to decry provisions in the proposed regulations that would establish a separate 2 percent target for recruitment and hiring of people with significant

disabilities, meaning, in his words, “total blindness, deafness or missing limbs”. He is obviously unaware of companies like Walgreen’s and Procter and Gamble that have established targets of ten percent or higher for inclusion of people with disabilities in their workforce. He also suggests that such a target may compel a “desperate job applicant” to self-mutilate in order to obtain a job. This nation has been at war for over ten years. Bureau of Labor Statistics data indicate that workforce participation for veterans with significant disabilities is half that of veterans with no disability. Does Mr. Frezza view a veteran who lost his or her sight or limbs in service to our country as one of those "desperate job applicants" unworthy of consideration for federal contractor employment?

We recognize that columns such as Mr. Frezza’s are intended for a particular audience with a certain mindset. However, polemics such as this must not go unrefuted lest they continue to reinforce the kind of negative stereotypes that have for too long kept many individuals with disabilities out of the mainstream of American life.

We would be happy to meet with the Forbes editorial board to share information on disability law and the challenges to employment facing people with disabilities.

Sincerely,

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