Creating an Inclusive Apprenticeship Environment Through Best Practices in Disability Identification and Disclosure

AT A GLANCE

For people with disabilities, the decision to disclose their disabilities and provide information about their disabilities can be nuanced and complex, with a variety of considerations. Creating an apprenticeship environment that is fully welcoming and inclusive for individuals with disabilities requires an understanding of the array of issues that are at play when it comes to identifying as a person with a disability and disclosing information about a disability. This brief discusses the various topics involved with disability disclosure and self-identification, including the legal parameters regarding disclosure and various considerations for apprenticeship sponsors, employers, providers of related technical instruction (RTI), and workforce partners, as well as program applicants and apprentices themselves.

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Acknowledgments

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About the Innovation Hub for Registered Apprenticeship

This product was developed as a contribution to the National Innovation Hub for Diversity, Equity, Inclusion, and Accessibility in Registered Apprenticeship. Operated by JFF, the Innovation Hub drives change in the Registered Apprenticeship system to increase diversity, equity, inclusion, and accessibility for populations that do not yet have access to the full promise of apprenticeship.

This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. It was created by the grant recipient and does not necessarily reflect the official position of the DOL ETA, which makes no guarantees, warranties, or assurances of any kind, express or implied, with respect to such information, including any information on linked sites and including, but not limited to, the accuracy of the information or its completeness, timeliness, usefulness, adequacy, continued availability, or ownership. This product is copyrighted by JFF.

About the Institute for Community Inclusion

The Institute for Community Inclusion (ICI) is a program of the School for Global Inclusion and Social Development at the University of Massachusetts, Boston. ICI's focus is on creating communities and a society that is socially just, where individuals with disabilities participate fully in their communities and lead rewarding, self-directed, and fulfilling lives. www.communityinclusion.org

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Introduction: Overview

Disability identification and disclosure is a multi-layered process with many considerations, including but not limited to these:

- Determining what is optimal for the individual.
- Identifying what is allowed and/or legally required.
- Weighing the right to confidentiality with the need for supports
- Implementing strategies that establish inclusive and respectful apprenticeships and that incorporate universal design principles.

This publication is designed to provide apprenticeship sponsors, employers, related technical instruction (RTI) providers, federal and state apprenticeship staff, and partners with guidance on the issues related to disability identification and disclosure, especially the effects of disclosure on applicants and participants. Having a thorough understanding of these issues is important to ensuring that apprenticeship stakeholders comply with legal requirements under the Americans with Disabilities Act (ADA) and Equal Employment Opportunity (EEO) requirements for apprenticeship programs. In addition, understanding when and how to inquire about disabilities and how to respond in a respectful and positive way when individuals disclose disabilities is part of creating an apprenticeship culture that is welcoming and accessible to individuals with disabilities.

In line with Jobs for the Future's Program Design Framework for Diversity, Equity, Inclusion, and Accessibility (DEIA) in Registered Apprenticeship, understanding best practices in disability inquiries should be part of an organization's overall DEIA efforts because having accurate information about participants with disabilities will improve an organization's ability to design a program that is inclusive of and accessible to people with disabilities and put the organization in a better position to establish and meet its DEIA goals.[1]

Disability Disclosure: Considerations and Responsibilities

Individuals have the right to decide for themselves whether to identify as people with disabilities and/or disclose their disability(ies). The decision-making process regarding disclosure is complex and involves a variety of possible choices and scenarios.

Reasons for Disclosing

Within the apprenticeship process, *there are four primary reasons* for an individual to disclose a disability:

1. **Data collection:** Disability identification is a check-the-box data collection exercise that can provide organizations with the information they need to ensure that they're in compliance with federal requirements. However, individuals have the right to decide for themselves whether or not to identify their disabilities for data collection purposes. Their decisions will have more impact on the accuracy of the workforce data that employers, apprenticeship offices, and the Department of Labor are able to collect and have access to than it does on the individual apprentices' roles or functions within the program. Identifying as a person with a disability for the purpose of data collection does not necessarily lead to disclosure of the disability or requests for accommodation; in fact, it should be treated as a separate process.

2. **Accommodation requests:** This is typically an action that is prompted by the apprentice or applicant during the process of requesting an accommodation needed to successfully complete an apprenticeship, including the hands-on work component and the classroom instruction, or to apply for apprenticeships. Just like with identification, it is done at the discretion of the individual with disabilities.
   → **Workplace accommodations:** Disclosing one's disability requires that the individual follow the sponsor or employer's process for requesting accommodation, provide proper documentation, and often talk to more than one individual to resolve the request. Therefore, the process of disclosure is built on a foundation of trust and security in order to reassure apprentices there will be little or no risk of labeling, discrimination, or other negative consequences.
   → **Education-related accommodations:** If accommodations are needed for the classroom-based instruction component of the apprenticeship, the apprentice, once again, is required to disclose their disability to the educational entity, provide documentation, and work out the specifics of the accommodation(s). It is important that sponsors and partners who are supporting apprenticeships ensure that related

technical instruction providers provide opportunities for requesting accommodations and appropriate disclosure of disability.

3. **Personal preference:** Individuals with disabilities may choose to inform a sponsor, an employer, or related apprenticeship partners of their disability(ies) as a means of information sharing, not necessarily tied to a specific accommodation. One's motivation for sharing a disability may include a desire to establish communication early should a need for accommodation arise or a desire to explain any work styles or personal characteristics that they would like their coworkers to understand to create a comfortable working environment. Such disclosure can also occur as part of "disability pride"—the idea that disability is something that's part of a person's identity and that a disability is a personal quality, rather than something to be hidden or ashamed of.

4. **The disability is apparent:** In cases where a disability is readily apparent (for example, a person who uses a wheelchair), disclosure of disability may appear automatic, and thus established. In such a case, however, it is still up to the individual to determine the level and amount of information they wish to disclose. Note: In such cases, a sponsor or employer can ask whether the individual will need reasonable accommodation to perform their duties.

Reasons for Not Disclosing

There are also reasons an individual may wish *not to disclose* a disability, including these:

1. **No impact:** The person's disability has no impact, or perceived impact, on their ability to successfully apply for or participate in the apprenticeship.

2. **Not apparent:** Many disabilities (such as learning disabilities or mental health conditions) are not apparent, and disclosure is unnecessary.

3. **Privacy:** All individuals have a right to privacy, and many people may feel that their disability is nobody else's business.

4. **Concerns about bias:** Individuals may be concerned that if they disclose a disability, they will be treated differently and be subject to discrimination in terms of either the way their application is handled or the way their performance as an apprentice is evaluated.

Disclosure From the Individual Perspective

People with disabilities are an integral part of the rich tapestry and diversity of U.S. society, and businesses, schools, and workplaces greatly benefit from their full inclusion. However, as with many human conditions and qualities, other people often have preconceptions, misconceptions, or a lack of comfort or understanding vis-à-vis people with disabilities, and there may still be cases of outright discrimination against people with disabilities.

People's decisions regarding disclosure are impacted by how they have been treated in their day-to-day lives, including what has occurred in the past when they have disclosed their disabilities. For individuals with disabilities, experiencing bias and/or benefiting from respectful support start early (at school and within community life and family interactions, for example). It's important to acknowledge these experiences as critical factors in any individual's decision regarding disclosure.

No matter the reason for their decisions regarding self-disclosure, apprentices with disabilities must weigh the positive and the negative impacts of these decisions.

If an apprentice chooses to disclose a disability, they may benefit from the ability to receive accommodations and supports. However, they may also have concerns about disclosure based on lived experiences that resulted in discrimination, marginalization, or limits on the opportunities available to them as a result of sharing disability information. Specific concerns expressed by people with disabilities regarding disclosure in the workplace include the following: [2]

- Not being hired or being fired
- The employer may focus more on the disability than the person's actual work performance
- Being denied health benefits
- Limitations on advancement opportunities
- Being treated differently by supervisors and coworkers
- Possible lack of supervisor support

Disability Disclosure: The Legal Context—ADA and Apprenticeship EEO Requirements

It is important that employers, sponsors, education providers, and partners understand the legal context regarding disclosure, which impacts both a program's ability to inquire about disability and an individual's decision to disclose. The legal and regulatory requirements impacting disability disclosure and inquiries in apprenticeship programs are based on a combination of federal requirements under Title I (the employment provisions) of the Americans with Disabilities Act (ADA), and Equal Employment Opportunity (EEO) requirements for apprenticeships (Title 29 CFR Part 30), which reinforce the requirements under the ADA and also contain specific requirements for Registered Apprenticeships to ensure equal opportunity for people with disabilities and other groups. Applying these requirements can be confusing. Here are some points to consider:

- Under the ADA and EEO requirements, employers and sponsors generally may not ask about disability in a job application or interview prior to an offer of employment. The only exception is if an employer is required to ask about disability under EEO affirmative action requirements, which will be discussed later in this brief.

- Applicants must disclose that they have disabilities if they are requesting reasonable accommodations for the application process. Similarly, current apprentices must disclose that they have disabilities if they need accommodations.

- Lastly, while sponsors and employers fall under Title I of the ADA and apprenticeship EEO requirements, public entities (such as public workforce agencies, schools, colleges, and universities) fall under Title II of the ADA, and they may ask about disability as part of their service intake/application processes, for data tracking purposes and to help identify services that may be available to assist individuals with their employment and training needs. However, if they are acting as an employer, then Title I of the ADA applies.

The bottom line is that it's important to understand what rules apply to the situation and employment capacity. The article "Disability Disclosure and the Americans with Disabilities Act" from the Job Accommodation Network (JAN) provides a more detailed overview of these issues, and JAN staff are available to answer questions on specific situations,

EEO Requirements: Voluntary Disability Disclosure

Per the apprenticeship EEO requirements, sponsors with five or more apprentices must have an Affirmative Action Plan and are required to request voluntary disclosure of disability for data tracking purposes. Let's review some of the guidelines and considerations for the Voluntary Disability Disclosure form for those to whom it applies:

- **Disability data is provided to the U.S. DOL Rapids system:** Self-identification of disclosure occurs via the Voluntary Disability Disclosure form.

- **When is this form used?** Applicants for apprenticeships must be provided with the form and invited to self-identify at the time of application, as well as when they are accepted but before they begin the apprenticeship.
  - → Current apprentices must be reminded yearly that they may voluntarily update their disability status. A good procedure for this is to provide them with the form they previously filled out and ask them if they wish to update it.

- **Self-disclosure is unrelated to apprenticeship application, evaluation, and completion:** In requesting voluntary self-identification for EEO purposes (e.g., completion of the Voluntary Disability Disclosure form), employers and sponsors should be clear that disclosing disability status is voluntary, and that all information will be kept confidential and will not impact hiring or personnel decisions for apprentices.

- **Confidentiality is imperative:** Program officials involved with hiring, firing, promotion, and other personnel decisions may not have access to the information, and the disclosed information may not be used for any employment-related decisions. Completed self-disclosure forms must be kept in a confidential file, separate from apprentices' personnel files.

- **Disclosed information is *only* for national data collection—not individual apprentice and employment records:** In inviting individuals to self-identify, as noted in JFF's *Program Design Framework for Diversity, Equity, Inclusion, and Accessibility in Registered Apprenticeship*, be transparent: Emphasize that the information provided will only be used to measure the national apprenticeship system's progress toward greater inclusion of people with disabilities, and will not impact hiring or other personnel decisions. Be clear that completion of the Voluntary Disability Disclosure form is for data tracking purposes *only*, and that if an individual requires an accommodation because of a disability, there is a separate process for requesting such an accommodation.

Disability Disclosure: Best Practices for Apprentice Support

Creating the Right Culture Regarding Disclosure and Self-Identification

As an employer, sponsor, or other entity that supports the development and success of an apprenticeship, what can employers and sponsors do to develop an inclusive apprenticeship culture in terms of disclosure?

Let's start by asking some important questions that employers and sponsors may reflect and act on:

1. Is the act of disclosing a disability and requesting accommodations considered a sign of strength and treated objectively, respectfully, and confidentially? The messaging regarding accommodation requests should convey that such requests are welcome. When requests are made, the reaction by managers and supervisors should be positive, with an attitude of working together to accommodate the individual's needs.

2. Do you have apprentices who have disclosed a disability and requested accommodations? If not, in what ways have you determined if this is because of a lack of need or because the process and culture are not encouraging for apprentices to do so? What measures do you use to determine the answer to those concerns?

3. Are the sponsor, business leaders, and the human resources department on the same page in terms of what constitutes an inclusive workplace? What is missing or incomplete in terms the inclusion of people with disabilities? Is disability incorporated into the organization's diversity statement? What has been or needs to be developed or established to ensure continuous improvement? Are individuals with disabilities incorporated into the development of guidelines and apprenticeship procedures on disclosure and self-identification?

4. What is the culture surrounding disability-related topics? This is difficult to measure but is critical when looking at the culture that apprentices are basing their decisions on. For example, are discussions around disability more of a taboo topic and considered a sign of weakness, or are they constructed as a part of life and respectfully integrated into conversations?

   Workplace culture plays an important role in determining whether individuals feel comfortable with disability disclosure and self-identification, and it's an area that should be monitored and addressed in an ongoing process.

5. What is the response to acquired disabilities, and how do apprentices, mentors, and coworkers respond to these life events? An acquired disability may be because of a workplace injury, a degenerative condition, or other health and accident factors. The workplace and sponsor culture can directly impact how employees discuss newly acquired disabilities with the employer, or consequently try to hide or mask the consequences of the disabling condition.

Incorporating an honest, multi-lens approach to answering these questions and considerations is a positive step toward creating a workplace culture that promotes a respectful, disability-friendly environment.

The reality is that disability affects everyone; one in four people in the United States have some type of disability.[3]

Whether the topic of disability is acceptable or stigmatizing, chances are many apprentices and employees are either experiencing life with a disability or care for someone who does, so not incorporating disability into the positive workplace culture because it is considered unimportant is not a realistic or productive approach. Research shows that when employers make efforts to create inclusive workplaces, they see improvements in workforce productivity because employees have tools and an environment that promote efficiency.[4] It's clear that everyone—employers and employees—benefits from a trusting, respectful, and self-reflective workplace culture.

The Role Apprenticeship Sponsors, Employers, and RTI Providers Play in Disclosure

Apprenticeship sponsors, employers, providers of related technical instruction (RTI), and other partners have a variety of roles to play regarding disclosure:

- First and foremost, understand how to have a respectful, productive conversation about disability with an apprentice or candidate as necessary to discuss accommodation or support needs.
  - Ensure that partners have the necessary diversity and inclusivity training to support this goal.
  - Keep the conversation focused on the functional, job-related aspects of the disclosure and request for accommodation. Be mindful of professional boundaries and ask respectful, pertinent questions; avoid asking about unnecessary details regarding a person's disability. For example, appropriate questions may include "How does your disability affect your ability to perform your job duties?" and "What would help accommodate you in your apprenticeship so that you can be successful?"
  - Remember, this is an interactive dialogue that may include mutual brainstorming to develop solutions and strategies. Don't expect apprentices to come with all the answers, particularly those who have newly diagnosed conditions.

- An employer's obligation does not end after the initial accommodation is created. There may be a need to follow up and ensure that the accommodation is effective.

- Ensure that all apprentices and applicants understand the right to reasonable accommodation, the procedures for making such requests, and that such *requests will be handled confidentially*. Information on requesting reasonable accommodations should be both made available in writing and shared orally (e.g., handed out to new apprentices in writing with an oral reminder).

- Develop clear policies and procedures regarding disclosure of disability, reasonable accommodations, and maintaining confidentiality of information. These policies should incorporate elements such as these:
    - Processes for creating an environment that is inclusive and welcoming to people with disabilities.
    - An overview of apprenticeship EEO requirements in terms of disclosure and accommodations.
    - Procedures for publicizing the right to reasonable accommodation in recruitment and orientation and throughout every apprentice's tenure in the program.
    - Information about how accommodation requests are to be handled and by whom.
    - An understanding of the importance of a culture that welcomes accommodation requests.
    - Procedures for maintaining the confidentiality of information.
    - Procedures for requesting self-disclosure of disability for EEO purposes (if applicable).
    - Resources on EEO requirements, reasonable accommodations, etc.

Establishment of and communication regarding policies and practices regarding disability identification and disclosure in a way that promotes DEIA

While there are rules that must be complied with in terms of disability identification and disclosure, it is important that these be implemented within a context of a work atmosphere that promotes and positively embraces and supports DEIA, where people with disabilities are treated in a welcoming and respectful manner.

Here are two steps toward achieving those goals:

- Include language in written policies and procedures that explains how these policies and procedures support DEIA efforts.
- When conducting training and otherwise discussing these issues, positively emphasize and discuss how such efforts support DEIA, avoid a "We need to do this for compliance" approach, and ensure that others are doing the same.

The way communication occurs regarding policies and procedures regarding disability identification and disclosure can have a major impact on the development of an inclusive culture.

Let's consider the following examples illustrating the comparison of two ways of explaining policies and procedures:

a) Compliant: "The government requires that every applicant and apprentice complete the voluntary disability disclosure form, so make sure they fill them out."

b) Compliant and Inclusive: "Diversity in apprenticeships is important, including greater inclusion of people with disabilities. It's important that we keep track of our progress. Therefore, please ask every applicant and apprentice to complete the voluntary disclosure form and explain that we ask for this information to improve our efforts regarding hiring and inclusion of apprentices with disabilities."

The first statement above is an example of a compliance approach ("Do this because we have to"), whereas the second statement is an example of an approach in support of DEIA ("We're doing this because it's important that we diversify our workforce and expand our hiring pool, in part by including more individuals with disabilities).

Another comparison of these two types of approaches:

a) Legal: The right to reasonable accommodation is posted in the required EEO notice and in other legally required notices.

b) Legal and Inclusive: Recruitment and application materials contain practical language that goes beyond the legal definition and states the following:

- Individuals with disabilities have the right to request reasonable accommodations.
- Specific guidance on how, why, and when accommodations may be requested.

This information is:

- Readily available and prominently displayed.
- Reviewed during all recruitment events.
- Reviewed during orientation and training for new apprentices.

Who are the partners in the development of inclusive apprenticeships?

While apprenticeships, by nature, include a variety of partnerships to support their development, implementation, and success, there are additional partnerships that may benefit from the

development and success of disability-inclusive apprenticeships and can provide support and assistance with accommodation and disclosure issues.

1. **Vocational rehabilitation (VR):** VR agencies are publicly funded and found in every state. VR's area of expertise is providing employment, training, and rehabilitation services for youth and adults with disabilities, as well as consultation and training services for employers on disability-related topics. VR is also a critical workforce and economic development partner that strives to develop quality employment matches between jobseekers and employers and can often provide customized training and funding support to ensure successful employment relationships. For more information and to identify the vocational rehabilitation agency near you, visit the listing of state vocational rehabilitation agencies on the Rehabilitation Services Administration's website.

2. **WIOA youth and adult services:** WIOA youth and adult services in general can be good partners to support apprenticeships, including those for people with disabilities. Young people with disabilities are eligible for WIOA Youth Services, and service providers can support the preparation of individuals for apprenticeships, including youth apprenticeships. Programs serving adults with disabilities should consider pursuing WIOA funding for RTI, support services, on-the-job training, and more.

3. **State developmental disability and mental health services:** Every state has a state developmental disability and mental health agency that funds various employment services and services, which are often provided through a network of community-based agencies. These services can be sources of recruitment and support for apprentices.

4. **Transition programs:** Students with disabilities receive postsecondary transition services, part of the focus of which is on employment and careers. Some students receive services through the age of 22 (depending on your state policies). Partnering with transition programs at area high schools (including vocational schools) can help prepare young people for apprenticeships, and these programs can also serve as sources of recruitment and support.

Conclusion

The issues of disability disclosure may seem complex, but abiding by the following core principles will ensure that issues are handled in a proper and respectful way that results in a more inclusive environment for apprentices with disabilities:

- It is always the individual's decision on whether or not to disclose their disability and what information they wish to share.

- Have clear guidelines and policies regarding disclosure, and ensure that sponsors, employers, RTI providers, and partners are aware of their requirements and responsibilities.

- When an individual discloses a disability as part of a request for accommodations and support, view the request for assistance as a positive step and address the request through a respectful interactive process.

- Have a goal of an overall culture of doing everything possible to be fully inclusive of apprentices with disabilities and providing them with supports that enable them to be as successful as possible.

Disclosure and Self-Identification Scenarios

The following are examples of scenarios that can occur regarding disclosure, and they include guidance on how to handle similar situations. Take a look and see if any of these scenarios sound or feel familiar.

Scenario 1: Applicant Decision to Disclose
An applicant for an apprenticeship uses a wheelchair and sets up a time to meet in person with the employer that will potentially serve as a work-based learning site. To ensure that the meeting space is accessible, the applicant lets the sponsor know ahead of time that they use a wheelchair. In addition, the applicant decides to disclose because, from their perspective, they don't like to "surprise" potential employers that they use a wheelchair. During the interview, given both the prior disclosure and the readily apparent nature of the disability, the employer asks if the individual will need reasonable accommodations to perform their job duties and they discuss the specifics of an accessible workplace.

Scenario 2: Administration of Voluntary Disclosure Form

An applicant is filling out an application for an apprenticeship. The staff person hands the Voluntary Disclosure Form to the applicant and points to the explanatory language and verbally summarizes it, emphasizing that the information will be kept separate and confidential and will not impact personnel decisions. The staff member also explains that this process is separate from requests for accommodation and assistance for individuals with disabilities and reviews the process for requesting accommodation. The staff member instructs applicants to leave the form face down on the table after they fill it out. The staffer then collects the form without looking at it and places it in an envelope.

Scenario 3: Apprentice Decision Not to Disclose

An apprentice has a learning disability that causes attention issues. During school, they learned strategies to maintain attention and organization through a variety of self-management techniques, including having a clear schedule and structure, using electronic reminders, deep breathing, and meditation. The apprentice has found these sufficient to perform effectively in the apprenticeship without the need for reasonable accommodation from the sponsor, employer, or RTI provider and feels no need to disclose the disability.

Scenario 4: Need for RTI Accommodations

An electrician apprentice is performing successfully in the work-based learning aspect of the apprenticeship but has recently expressed frustration to her mentor about not being able to pass the assessments for the related technical instruction. The apprentice is even talking about quitting the apprenticeship. The mentor and supervisor reach out to the sponsor with the apprentice's permission and inform the sponsor that the apprentice's disability is no longer being accommodated. The sponsor contacts the RTI (related technical instruction) provider and learns that the assessment process has changed from 15-minute online tests to two-hour comprehensive assessments. Because the assessment has been changed to test participants on large amounts of content, it no longer meets this apprentice's accommodation needs. The apprentice is a client of a public vocational rehabilitation (VR) program, and the sponsor reaches out to VR for assistance. Working with the apprentice, VR and the sponsor negotiate a change with the RTI provider back to the previous assessment method to facilitate her success.

Resources

These resources can be of assistance to apprenticeship sponsors, employers, RTI providers, and partners in addressing issues related to disclosure of a disability.

Designing Inclusive Apprenticeships: A Guide for Recruiting & Training Apprentices With Disabilities, Partnership on Inclusive Apprenticeships (2023), https://inclusiveapprenticeship.org/guide/

Disability Disclosure and the Americans with Disabilities Act, Job Accommodation Network, https://askjan.org/topics/Disability-Disclosure.cfm

Disability Self-Identification: A Guide for Apprenticeship Sponsors, U.S. Department of Labor, https://www.dol.gov/sites/dolgov/files/ETA/apprenticeship/pdfs/Self-ID_SponsorGuide.pdf

Equal Employment Opportunity in Apprenticeship, Title 29 Code of Federal Regulation Part 30, https://www.ecfr.gov/current/title-29/subtitle-A/part-30

Encouraging Self-Identification, Employer Assistance and Resource Network on Disability Inclusion, https://askearn.org/page/encouraging-self-identification

Michael J. Studenka, "5 Tips for Addressing Employees with Disabilities," *HR Magazine*, Society for Human Resource Management, September 27, 2016, *https://www.shrm.org/hr-today/news/hr-magazine/1016/pages/5-tips-for-addressing-employees-with-disabilities.aspx*

Job Accommodation Network, https://askjan.org

JFF's Program Design Framework for Diversity, Equity, Inclusion, and Accessibility in Registered Apprenticeship, Jobs for the Future Center for Apprenticeship & Work-based Learning (2022), https://info.jff.org/apprenticeshipdeia-framework

ADA National Network, *Reasonable Accommodations in the Workplace*, https://adata.org/factsheet/reasonable-accommodations-workplace

U.S. Department of Labor, Employment and Training Administration, *Guidance – Equal Employment Opportunity in Registered Apprenticeship*, Office of Apprenticeship Circular No. 2023-01, November 17, 2022, https://www.apprenticeship.gov/sites/default/files/bulletins/circular-2023-01_0.pdf

U.S. Department of Labor, Employment and Training Administration, Voluntary Disability Disclosure, Program Registration and Apprenticeship Agreement, Office of Apprenticeship, https://www.dol.gov/sites/dolgov/files/ETA/apprenticeship/pdfs/Disability_Disclosure_form-671.pdf

Endnotes

1 Vanessa Bennett et al., *JFF's Program Design Framework for Diversity, Equity, Inclusion, and Accessibility in Registered Apprenticeship* (Jobs for the Future, Boston, MA, 2022), https://info.jff.org/apprenticeshipdeia-framework

2 Sarah von Schrader, Valerie Malzer, and Susanne Bruyère, "Perspectives on Disability Disclosure: The Importance of Employer Practices and Workplace Climate," *Employee Responsibilities and Rights Journal*, 26, (December 2014): 237–255, https://doi.org/10.1007/s10672-013-9227-9

3 Centers for Disease Control and Prevention, *Disability Impacts All of Us* (Atlanta, GA, 2022), https://www.cdc.gov/ncbddd/disabilityandhealth/infographic-disability-impacts-all.html#:~:text=Up%20to%201%20in%204,have%20some%20type%20of%20disability

4 Vivian Hunt et al., *Delivering Through* Diversity (McKinsey & Company, January 18, 2018), https://www.mckinsey.com/capabilities/people-and-organizational-performance/our-insights/delivering-through-diversity