

After the ADA:

Disability Representation in the US Federal Workforce

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Abstract

Thirty years after the passage of the ADA in 1990, Americans with disabilities experience an unemployment rate double that of their non-disabled peers. In response, the Clinton and Obama administrations have used executive action to boost disability employment in the federal workforce. This paper uses publicly available data from the Office of Personnel Management to analyze the success of these actions. Specifically, I judge success in terms of both *quantity* and *quality* employment. Ultimately, I find that certain segments of the disability population—namely, those with “targeted” disabilities—were excluded from the gains in federal employment in the last decade. I recommend further executive action with more meaningful goal setting to include those left behind by previous reform.

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Introduction

Together we have begun shifting disability policy in America from exclusion to inclusion; from dependence to independence; from paternalism to empowerment... We cannot be satisfied until all citizens with disabilities receive equal treatment under the law, whether in the workplace, in schools, in government, or in the courts.

President William J. Clinton¹

Few policy domains have shifted more dramatically in recent decades than disability. In 1990, the Americans with Disabilities Act (ADA) outlawed discrimination of disabled people and brought, for the first time, the principle of disability civil rights into mainstream policy discourse. Its passage was a bipartisan effort, buoyed by activists and local leaders such as Marca Bristo² and Judith Heumann,³ and endorsed by then-President George H.W. Bush. Standing in the rose garden in late July, President Bush famously declared: “Let the shameful walls of exclusion finally come tumbling down.”

In the years after the ADA, the nation saw a significant decline in the institutionalization of people with intellectual and developmental disabilities (National Council on Disability [NCD] 2018a). Public spaces and private businesses created accommodations, and disabled employees sought legal recourse for workplace discrimination. The ADA’s successes were cultural as well as economic; since 1990, disabilities have entered the cultural milieu through movies, television, children’s toys, smartphone emojis, and more (see Garland-Thompson 2005).

In many ways, however, those “shameful walls of exclusion” remain standing. From inaccessible education (NCD 2018b) to inadequate healthcare (NCD 2016), disabled Americans face barriers unknown to their non-disabled peers. This paper focuses on just one: employment. Evidence suggests that the ADA, by enforcing workplace accessibility standards, imposed new costs on employers and disincentivized disability employment (DeLeire 2000). Today, disabled people experience an unemployment rate double that of the general population (NCD 2018a), and approximately 320,000 disabled employees earn a subminimum wage in legal, sheltered workshops (NCD 2018a).

On July 26, 2000—the 10th anniversary of the ADA—President Clinton signed Executive Order 13163 to address these issues. His administration recognized that, “throughout the United States, qualified persons with disabilities have been refused employment despite their availability and qualifications” (Clinton 2000). The Order demanded that the federal government become a “model employer” and hire an additional 100,000 people with disabilities over five years. Sadly, with the imminent change in administrations, little was done to accomplish these demands.

Exactly one decade later, on the 20th anniversary of the ADA, President Obama signed Executive Order 13548, “Increasing Federal Employment of Individuals with Disabilities.” The Order recognized the failure of Order 13163 and adopted its objectives—to hire an additional 100,000 disabled employees over five years. Again, it called on the government to become “a model employer for individuals with disabilities” (Obama 2010).

¹ Proclamation 6605 (October 1993): <https://www.govinfo.gov/content/pkg/STATUTE-107/pdf/STATUTE-107-Pg2739.pdf>

² For more information on these heroes of the disability rights movement, please visit the following sources: <https://www.nytimes.com/2019/09/08/obituaries/marca-bristo-dead.html>

³ <https://time.com/5793652/judith-heumann-100-women-of-the-year/>

The central question of this paper, therefore, is as follows: *Is the federal government a “model” employer for people with disabilities?* Four administrations, three decades, and two Executive Orders after the passage of the ADA, one certainly hopes so.

A government spokesperson might answer this question in the affirmative. In 2016, the Office of Personnel Management (OPM) reported that, from 2011 to 2015, the federal government hired an additional 109,575 disabled employees—far exceeding its goal (OPM 2016).

In this paper, however, I hope to achieve a deeper understanding. I hope to separate *quantity* employment from *quality* employment. In analyzing the effects of Orders 13163 and 13548, I hope to provide a way forward for the disability community who strives not just for employment, but for equal employment and opportunity. These are the qualities we should expect of a federal workforce funded by the American people.

In the following section, I delve deeper into the realities of disability employment and define, as best I can, what is meant by a “model” employer.

Background – What Makes a “Model” Employer?

One might assume that an American workforce unrepresentative of the disabled population is only natural. After all, it is true that some disabilities are simply prohibitive of work. It is true too that disabilities are highly concentrated among the elderly, who for obvious reasons are likely to have retired and exited the labor force. In 2017, 34.7% of Americans ages 65+ had a disability according to the American Community Survey. For ages 18-64, the number was 10.3% (Erickson, Lee, and von Schrader 2017).

Combined, these factors produce significantly lower labor force participation rates for disabled people than the general population. In 2017, 20.6% of disabled Americans participated in the labor force, compared to more than two-thirds of their non-disabled peers (Lynn-Kang, Dunn, and Blank 2018, 7).

None of these numbers are meant to suggest that disability employment is a non-issue. Disability *unemployment*—people who are able and looking to work—is more than double the rate of non-disabled unemployment (15). Disabled people are also highly concentrated in low-wage service occupations (11) and are more likely than non-disabled people to work part-time jobs involuntarily (14). Examining disability employment in the 1980s and 1990s, Trupin et al. observed that employment conditions varied considerably across disability type, but, overall, disabled people were “prone to a last-hired, first-fired phenomenon” (1997, 1) in which they found themselves especially vulnerable to economic downturns. This phenomenon was certainly present after the 2008 financial crisis, in which “workers with disabilities were disproportionately affected by the loss of blue-collar and goods-producing jobs” (Livermore and Honeycutt 2015, 76). And now, writing amid a global pandemic, I can only imagine how disabled employees will be affected.

With these realities in mind, I strive in this paper to judge the federal government only according to what is possible. That is, I cannot expect the government to hire disabled people at similar rates as non-disabled people. As I have shown, disabled people A) make up a relatively small percentage of the population and B) an even smaller percentage of the labor force. However, I can and do expect that, once hired, disabled employees are treated as equal, valuable members of the workplace.

This is perhaps a fitting transition into what I consider a “model” employer, with reference to the *quantity* vs. *quality* employment dichotomy mentioned in my introduction. In “The Curious Case of Women in State and Local Government,” author Lee Sigelman set standards which I would like to emulate in my research. Sigelman argued that, though it is important to hire large numbers of female employees, these numbers “may mean little if women are largely relegated to lower-level (less prestigious, less powerful, less remunerative) positions” (1976, 595). In other words—and pivoting back to my relevant context—it is not enough to hire 100,000 disabled employees over five years. These employees must also be given legitimate opportunities to advance in the workplace.

A model employer for disabled people, therefore, must do two things. First, it must hire in significant quantities that match the disabled community’s presence in the labor market. Second, it must avoid ‘tokenism’—purely symbolic efforts at inclusivity—by valuing disabled employees and promoting them to positions of influence within the organization. Sigelman has developed measurements for these two conditions, which I will explain fully in my Methodology section. Before then, I would like to take a brief detour to explain the theory of “representative bureaucracy,” which, as will be seen, explains the particular benefits of marginalized communities working in the public sector.

A Brief Review of ‘Representative Bureaucracy’

Most employees in the United States do not work for the federal government. It may seem strange, then, that I have limited the scope of this paper to disability employment only in the public sector. I have done so for two reasons. First, with the executive action of Presidents Obama and Clinton, the federal government has promised on two occasions to become a model employer of people with disabilities. I believe the government should honor this commitment. Doing so would provide new opportunities to thousands of disabled employees *and* set an example to private employers nationwide.

Second, federal employment serves a vital yet overlooked (and often maligned) role in American government. I chose to write about bureaucrats—the people who administer Social Security benefits, oversee Medicare and Medicaid, enforce the ADA, and more—because these workers *are* American government. Legislators may write laws, but unelected bureaucrats and civil servants bring those laws to life. Without knowing it, these employees hold immense power in the policy implementation process. It matters who they are and where they come from.

An emerging area of social science, “representative bureaucracy” imagines the potential of a government that looks like America—that is, one which draws proportionately from all sectors of society. Bureaucrats are individuals who derive values from their social backgrounds, and they will selectively implement policies according to these values. Bureaucracy, therefore, is always representative; the question is *for whom*. In this section, I examine the history and practice of representative bureaucracy.

Early Theories

The first major theory of bureaucracy comes from Max Weber (1946), whose “ideal type” bureaucracy is perhaps closest to the casual, non-academic understanding of the term. In Weber’s view, the ideal bureaucracy is neutral. It defers completely to the legislative branch—the true rule-makers—whose laws it enforces “without either resentment or favoritism” (1946, 230). The individual bureaucrat, in this model, is like a “single cog in an ever-moving mechanism which prescribes to him an essentially fixed route of march” (1946, 228). This “strict subordination” (1946, 229) that characterizes his vision makes bureaucratic institutions efficient and rational organizers of government.

The theory of representative bureaucracy developed perhaps not as a direct response to Weberian bureaucracy, but certainly as a detractor. The term “representative bureaucracy” was invented by Kingsley (1944). (Do not let the dates cause confusion; Weber predates Kingsley by more than two decades.) In his study of the English civil service, Kingsley observed that officers were selected disproportionately from society’s ruling class, and that this unequal distribution likely affected the civil service’s overall outlook, culture, and values. The theory was further developed by Norton E. Long (1952), who, writing in the American context, questioned the ability of Congress to adequately represent the will of the people, and argued that “it is of critical importance that the bureaucracy be both representative and democratic” (1952, 813). These were, at the time, revolutionary assertions; that the words ‘democratic’ or ‘values’ could be applied to the unelected bureaucracy would have seemed absurd to Weber.

These arguments had gained some popularity when they were chosen as the subject of Samuel Krislov’s book, *Representative Bureaucracy*, in 1974. In it, Krislov echoes Long’s skepticism of the representativeness of Congress, claiming that “Gerrymandering and less overt

systematic efforts to pervert electoral systems are omnipresent" (1974, 37). Insisting that bureaucrats are inherently biased in one way or another, Krislov dismantles Weber's neutral bureaucracy and asks, "Neutrality for whom?" (1974, 81).

Krislov goes further, saying that employment in the bureaucracy is a desirable form of political participation. By affirming the idea that all societal groups have "a right, an access, to [the] position and influence" (1974, 129) of government, a representative bureaucracy strengthens the social fabric and compensates for other, less representative branches of government. In this way, Krislov asserts that Weber's neutral, strictly subordinate bureaucrat is not only fictitious, but less than ideal.

It would be incorrect to claim that the theory of representative bureaucracy has triumphed over the old, Weberian model. In fact, Weber's ideas are more likely to appear in a college textbook than those of Kingsley or Krislov. Nevertheless, it would be useful to move on to a preliminary examination of evidence. Have there been attempts to create a representative bureaucracy in America? If so, what were the results?

From Theory to Practice

Affirmative action policies for women and minorities of color in American federal employment received much attention in the late sixties and early seventies. Though discrimination in federal employment had been illegal since the passage of the Ramspeck Act in 1940, these groups were not hired in large numbers by the bureaucracy until decades later. It was not until the passage of the 1964 Civil Rights Act (which established the Equal Employment Opportunity Commission), several Executive Orders by the Johnson and Nixon Administrations, and Supreme Court intervention that these groups were effectively recruited and employed. For a more thorough tracing of this history, see Naff (2001), who declared at the time of her writing that "the federal government is close to being a representative bureaucracy" (2001, 21), at least in terms of race and sex.

Why were these affirmative action policies pursued? Much like the passage of President Obama's Executive Order 13548 (referenced in the introduction), these policies sought to make government a "model employer" for minority groups. These policies were *not* inspired by Kingsley's theory of representative bureaucracy. That is, it was not intended that bureaucrats from underrepresented communities would behave any differently than previously employed bureaucrats. Nevertheless, these behavioral differences were indeed found.

Meier and Stewart (1992) are credited as connecting, for the first time, the demographic characteristics of bureaucrats with their policy outputs. The focus of their study was teachers in Florida public school districts. (I state this as a disclaimer, as bureaucracy at the local level has a different history than the one outlined above. The findings are nevertheless enlightening.) The authors found that increased representation of black teachers was positively correlated with placement of black students in gifted classes and negatively correlated with placement of black students in low-performance classes. More black teachers also meant higher rates of black student success on standardized tests. The authors concluded that "bureaucrats are able to influence not only public policy outputs but also public policy outcomes in predicted ways" (1992, 167), given their demographic characteristics.

John J. Hindera (1993) also studied the relationship between bureaucrats' identities and their policy outputs, this time at the federal level. Hindera examined bureaucrats in the Equal Employment Opportunity Commission (EEOC) district offices, whose responsibility it is to

distribute monetary benefits to victims of employment discrimination. Hindera ultimately determined that the overrepresentation of black bureaucrats in these offices was partially responsible for the disproportionate allocation of benefits to the black community, even when controlling for the black community's disproportionate claim-making.

The work of Thielemann and Stewart (1996) is unlike the above research in that it examines not policy outputs, but rather the *demand* for representative bureaucracy. Focusing on the government response to the AIDS crisis, the authors surveyed people based on race, gender, and sexual orientation, finding considerable demand for bureaucrats who come from these communities. People were more comfortable receiving government services when they were administered by people who looked like them. In this way, "Representative bureaucracy is important not just because it has important policy implications... but also because it is something valuable to citizens who are served by the agencies" (1996, 172).

More recent research has confirmed the benefits of representative bureaucracy (Andrews and Miller 2013; Atkins and Wilkins 2013). Given these observed benefits, I will return now to the theory itself, describing in more detail its complexities and controversies.

Ongoing Controversies

What does it mean for a bureaucracy to be representative? Frederick Mosher (1968) provided a helpful complication to the theory when he claimed that bureaucratic representation exists in two forms: passive and active. Passive representation can be equated to diversity; it occurs when the demographic characteristics of the bureaucracy "mirror the total society" (1968, 12). Active representation is more difficult to achieve. It occurs when those bureaucrats who are passively represented actively make decisions or "press for the interests and desires of those whom he is presumed to represent" (1968, 12). In this way, affirmative action policies do not necessarily imply an actively representative bureaucracy. It is not until the selected bureaucrats—say, female bureaucrats—behave in such a way that will improve the conditions of all women that a bureaucracy can truly be called representative.

There is a great deal of debate surrounding the precise relationship between passive and active representation. Frank J. Thompson (1976) argues that, for passive representation to become active, several conditions must be met. Among the myriad factors that affect this transition are "the conditions in the organization's environment, the issue area under consideration... and the positional and physical location of minority civil servants within the agency" (1976, 213). The minority bureaucrats must identify strongly with their demographic group and its shared system of values. They must have discretion over "issues which have patent ramifications for the well-being of their race" (1976, 215) or, more broadly, their community. (A female bureaucrat working in the Department of Agriculture may have little power over the issues relevant to her sex. Further, that she identifies as female does not mean that she shares the values traditionally associated with women.)

Meier (2018) adds to these conditions by framing active representation as a "deep risk" (42) for the individual bureaucrat. Though every exercise of discretion need not stand in direct defiance of orders, bureaucrats who pay special attention to certain communities over others are, to some extent, putting themselves at risk. Presumably, any individual is hired to further the interests of the organization and nothing more; to operate with secondary objectives is to risk unemployment. For this reason, Meier proposes the idea of a "critical mass of bureaucrats" (48) necessary to achieve active representation. In other words, bureaucrats will not accept the risks

associated with active representation until they are surrounded by colleagues who will do the same. For this reason, the theoretical relationship between passive and active representation changes from Figure 1 to Figure 2.

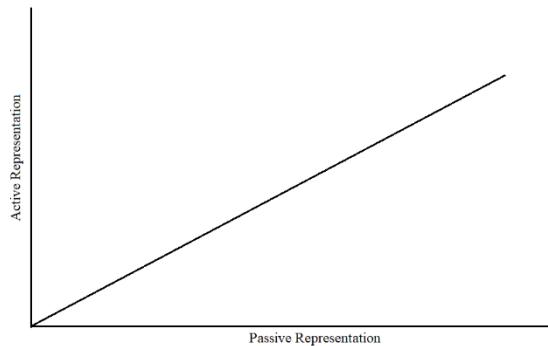


Figure 1: The hypothetical relationship between active and passive representation. (No critical mass necessary.)

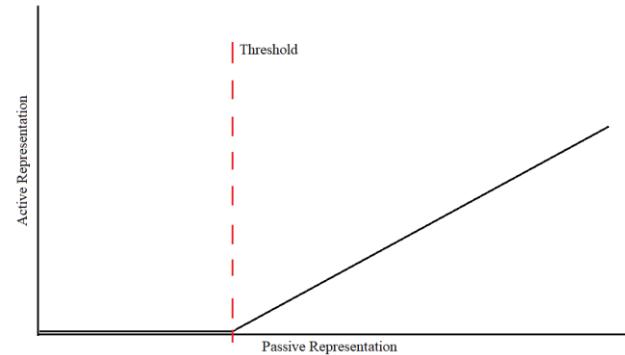


Figure 2: Hypothetical relationship between active and passive representation. (Critical mass necessary.)

The question of value-sharing is also the subject of debate. Do bureaucrats necessarily share their community's values? Meier and Nigro (1976) juxtaposed two forms of identity: bureaucrats' social upbringing, and their agency affiliation. They wanted to know which had a stronger influence on the bureaucrat's values. (In this case, 'values' were measured via a questionnaire, asking bureaucrats to rank policy areas by the funding they should receive.) While both are important, the authors conclude that "agency affiliation is a more likely predictor [of values] than origins" (467). As one can imagine, these findings were a major setback for the theory of representative bureaucracy.

Thankfully, later work by Rosenbloom and Featherstonhaugh (1977) contradicts these dire findings. The authors ask whether a bureaucrat's socially derived values disappear after gaining employment in the government. They observed that African Americans in public service and those in the general population do share similar values. These findings hold true for women in public service as well (Dolan 2002).

Gaps in the Literature

Given these summaries of past literature, I note two major shortcomings. The first, and perhaps most obvious, is the lack of scholarship on bureaucrats with disabilities. I do not believe this is the product of discrimination or bias. Rather, many of the existing writers were inspired by affirmative action policies for women and minorities of color in the sixties and seventies. The comparable policies for people with disabilities did not come until much later, with the passage of the Americans with Disabilities Act in 1990. For this reason, there is a wealth of historical data describing the race and sex of the bureaucracy that does not exist for disability. It is natural, therefore, that disability is less desirable subject of research. Nevertheless, I am proud to bring it into this ongoing conversation.

Second, there appears to be a bias against wholistic examinations of the bureaucracy and in favor of small, "street-level" bureaucracies (a term borrowed from Lipsky 1980). Street-level bureaucrats are those who frequently interact with the public; they are the schoolteachers, police

officers, social workers, and others who, in their daily decision-making, have “wide discretion over the dispensation of benefits” to the public (xi). Authors such as Thompson (1976) have taken for granted that these bureaucrats, combined with those in the highest levels of the bureaucratic hierarchy, are the only ones capable of exercising discretion over the policy implementation process. Scholars have therefore focused their attention on the values of street-level bureaucrats (Dolan 2002; Meier and Nigro 1976; and Rosenbloom and Featherstonhaugh 1977) rather than the representativeness of the bureaucracy at large. As will be seen in future sections, people with disabilities exist (to varying degrees of representativeness) in every level of the bureaucratic hierarchy. To focus only on the street level is, I believe, short-sighted.

By conducting a wholistic examination of people with disabilities in the bureaucracy, this paper addresses both gaps, and hopefully provides new directions for research. I do so through one primary question: *Is the federal government a model employer for people with disabilities?* It is quite clear that, after Executive Order 13548, disabled people were *passively* represented in the bureaucracy in higher numbers than before. What is unclear is whether these employees were given opportunities to become active representatives of the disabled community.

Put differently, it seems that the federal government can choose which model it would like to follow: the Weberian model in which employees are like “cog[s] in an ever-moving mechanism” (Weber 1946, 228), or the representative model of Kingsley and others, in which a diverse federal workforce is valued and sought out. In the coming analysis, I hope to determine which model won out after Executive Order 13548. Were disabled employees empowered and given opportunities for advancement, or were they simply added to the payroll?

Methodology

To summarize, a government that is a ‘model’ employer for people with disabilities will have accomplished two things: First, it will have hired disabled employees in numbers that reflect their prevalence in the general population. Second, it will have promoted them to positions of influence—positions in which they can exercise discretion over the policy implementation process and deliver tangible benefits to their community. In this section, I develop a quantitative approach to judge the government’s progress along these criteria.

Data: Representation

Executive Order 13548 required that the Office of Personnel Management (OPM) report “regularly” to the President regarding its implementation. To that end, the OPM created its annual “Report on the Employment of Individuals with Disabilities in the Federal Executive Branch,” from which much of the data in this paper was obtained. The most recent report was released on September 2, 2016 and includes information from FY 2010 – 2015 (Cobert 2016).

The report details the percentage of new hires as well as full-time, non-seasonal employees who have disabilities in each Executive Branch agency. Disability was divided into three categories: “Targeted,” “Non-Targeted,” and “Service-Related.” See Table 1 for a complete list of targeted disabilities. These disabilities are often visible to employers and have been used to discriminate against qualified job applicants. The government has therefore “targeted” these disabilities as deserving of additional assistance.

The second category in the OPM data includes all disabilities not included in Table 1. (See Appendix A for the complete list of options provided in SF 256.) These disabilities are more likely to be invisible, such as depression or diabetes, and have historically been less likely than targeted disabilities to affect an individual’s employment outcomes. An employee who selects “Other” will automatically be added to this Non-Targeted category.

Table 1: Targeted disabilities according to federal identification form, SF-256.

- Developmental disability (e.g. autism)
- Traumatic brain injury
- Deaf or serious difficulty hearing
- Blind or serious difficulty seeing
- Missing extremities (arm, leg, and/or foot)
- Significant mobility impairment
- Partial or complete paralysis
- Epilepsy or other seizure disorder
- Intellectual disability
- Significant psychiatric disorder (e.g. PTSD, major depression)
- Dwarfism
- Significant disfigurement (e.g. burns, wounds, or congenital disorders)

The third and final category, “Service-Related,” includes veterans who obtained a disability in the line of duty. The OPM specifies veterans who are “30% or more disabled.” This figure refers to Department of Veterans Affairs’ compensation rates. Veterans who were wounded during their

service are entitled to financial benefits. The VA assesses the severity of an individual's disability, assigns a percent to that disability, and adjusts the benefits accordingly. This third category includes veterans working for the federal government who have achieved a compensation rate of at least 30%.

For FY 2010 to FY 2015, the OPM report describes the representation of these disability categories at the agency-level, as well as governmentwide. For my analysis, I focus only on Cabinet-level agencies, as well as independent agencies with 1,000+ employees.

Data: Promotion

The OPM report also tracks disability representation at each level of the General Schedule (GS), or government pay scale. The lowest grades, GS-1 through GS-6, are entry-level positions usually occupied by young people and students. GS-14 and GS-15 are top-level, supervisory positions. Grades higher than GS-15 belong to the Senior Executive Service (SES), positions just below presidential employees.

By analyzing these grades, I hope to discover the extent to which the federal government has fulfilled the second obligation of a model employer: promoting disabled employees to positions of influence.

Analysis: Representation & Promotion

There are several ways to evaluate this data. Scholars of representative bureaucracy have not yet reached a consensus; see Riccucci and Saidel (1997, 425) for an overview of the methods various authors have employed. For my part, I rely on the *representative ratio*, a common and easily calculable measurement of representativeness. It compares a group's relative size in an organization to its percentage in the general population. A representative ratio less than 1.0 indicates that a group is underrepresented; greater than 1.0 indicates overrepresentation.

Unlike with other demographic groups, it would be unfair in a study of disability to compare prevalence in the bureaucracy to prevalence in the general population. Many disabled people do not work and are prohibited from doing so. Therefore, I define my representative ratio as follows:

$$\text{Representative Ratio} = \frac{\% \text{ of Federal Workforce Disabled}}{\% \text{ of Working-Age Population Disabled} \cdot \% \text{ Not Prevented from Working}}$$

In the above ratio, I compare disability's prevalence in the bureaucracy to the percentage of Americans who are disabled yet able to work. Through all these variables, I hope to have maintained an apples-to-apples comparison. Retirees and institutionalized populations have been excluded, as have all people whose disabilities are prohibitive of work.

Data for the denominator was obtained from the US Census Bureau's 2010 American Community Survey (ACS) as well as the VA's Compensation and Pension reports. Combined, these sources provide accurate counts of disabled Americans in the OPM's three disability categories. Self-reported statistics from the ACS reveal the percentage of each disability-type that is prevented from employment due to the severity of their disability. (See Appendix B for an overview of relevant statistics by disability type.)

In my analysis, I calculate several representative ratios for comparison across time, agency, pay grade, and disability category.

Data: Employee Attitudes

The goal of this paper, in part, is to ensure that disabled bureaucrats hired after the signing of Order 13548 have not been ‘tokenized.’ That is, it is to ensure that these employees have been empowered to act independently, to pursue their *own* goals in addition to those of the organization. To that end, data which reflects how disabled bureaucrats feel about their role in the workforce is highly relevant.

It is not enough, in my opinion, to simply report on the representative ratios of the bureaucracy and its various agencies. In this section, I hope to determine the consequences of these ratios, if any. Do disabled federal employees report different levels of job satisfaction than their non-disabled peers?

To measure employee attitudes, I turned to the Federal Employee Viewpoint Survey (FEVS), the results of which are public and available online. The survey, administered electronically every year by the OPM, was created in 2002 as a way for federal employees to reflect on their work experiences and provide feedback to their employers. The 78-item survey covers a wide range of topics including work/life balance and job satisfaction. Questions are answered on a 5-point scale (Strongly Agree to Strongly Disagree, including a neutral option). Results are properly weighted to ensure representativeness; according to the OPM, final data sets reflect agency composition and demographic makeup within +/- 1%.

The FEVS did not begin isolating data from disabled vs. non-disabled respondents until recently, so my analysis covers years 2012 to 2019.

Analysis: Employee Attitudes

From the 78 total prompts, I isolated 7 of interest to my research:

Table 2: Isolated questions from the Federal Employee Viewpoint Survey

Part I: Opportunities for Advancement

- 22. “Promotions in my work unit are based on merit.”
- 25. “Awards in my work unit depend on how well employees perform their jobs.”
- 33. “Pay raises depend on how well employees perform their jobs.”
- 65. “How satisfied are you with the recognition you receive for doing a good job?”
- 67. “How satisfied are you with your opportunity to get a better job in your organization?”

Part II: Overall Satisfaction

- 69. “Considering everything, how satisfied are you with your job?”
- 70. “Considering everything, how satisfied are you with your pay?”

The prompts in Part I were chosen as indicators of the second duty of a model employer: to give employees with disabilities legitimate opportunities to advance. Prompts in Part II did not fit neatly into the duties of a model employer, but responses about overall job and pay satisfaction are enlightening.

Ignoring neutral responses, I converted the responses to these prompts to a numeric scale ranging from +1 (strongly agree) to -1 (strongly disagree). Positive responses indicate feelings that the federal workplace is meritocratic, and people are satisfied with their jobs. For each question,

and from 2012 to 2019, I compare the aggregate responses of disabled employees to those of their non-disabled peers. Take the following example from 2019:

Prompt 22: "Promotions in my work unit are based on merit."					
	Strongly Agree (+1)	Agree (0.5)	Neutral (0)	Disagree (-0.5)	Strongly Disagree (-1)
Disabled	0.109	0.225	0.276	0.168	0.222
Non- Disabled	0.117	0.299	0.273	0.16	0.157

Each cell contains the percent of respondents who selected each option. Multiplying these cells by its relevant point value (+1 to -1) yields the following table:

Prompt 22: "Promotions in my work unit are based on merit."					
	Strongly Agree (+1)	Agree (0.5)	Neutral (0)	Disagree (-0.5)	Strongly Disagree (-1)
Disabled	0.109	0.1125	0.00	-0.084	-0.222
Non- Disabled	0.117	0.1495	0.00	-0.08	-0.157

Taking the sum across each row reveals a value of -0.08 for disabled respondents and +0.03 for non-disabled respondents. In other words, non-disabled respondents feel more positively about the meritocratic nature of their workplace than disabled respondents do. Similar comparisons will be made for the remaining prompts as well as across time.

Limitations

The coming analysis is limited insofar as the publicly available data from the OPM is incomplete. This data has three major shortcomings: First, agency-specific representation data is only available for six years, 2010 – 2015. Second, agency-specific GS-level data is unavailable. (That is, stratification ratios may only be calculated for the bureaucracy at large.) Finally, the FEVS did not separate respondents based on disability status until 2012, rendering data before this year unusable.

Together, these limitations make it difficult to form a thorough description of the bureaucracy before the signing of Order 13548 in 2010. Nonetheless, the data say plenty about the bureaucracy it created and whether, as I hope to discover, it is a model employer for people with disabilities.

I would also like to caution readers against drawing causal conclusions between the first part of my analysis (representation & promotion) and the second (employee attitudes). It may be true that employees with disabilities report lower levels of satisfaction because their peers have been hired and promoted insufficiently, or because they have been tokenized. Or these phenomena may be unrelated. My intent in this two-part analysis is only to paint a wholistic picture of the federal government and its disabled employees. More research is necessary to create a causal inference.

Findings

As was mentioned in the introduction, the executive branch hired an additional 109,575 disabled employees in the five years following Executive Order 13548—exceeding its original goal by nearly ten thousand. In this section, I demonstrate how these gains, though impressive, were unevenly distributed across agency, disability category, and pay grade. I conclude that the federal government is not currently a model employer of people with disabilities.

A model employer is defined not just by the number of people it hires, but also by the opportunities it gives its employees for advancement. This section is structured in two parts, addressing the two criteria of a model employer.

Part I: Hiring

The gains from Executive Order 13548 were unprecedented. This fact, despite the criticism that follows, should not be understated. In the years after the Order was signed, the executive branch hired more disabled employees than at any time in its recorded history. In 2009, disabled employees made up less than 10% of the federal workforce. By 2015, the number had risen to nearly 15%.

Prior to Order 13548, the most significant gains had followed the passage of the Americans with Disabilities Act in 1990. Given that the ADA created legal protections for disabled people, the nation saw an increase in disability self-identification in 1990 that was reflected in government employment. Even then, however, disability in the executive branch increased by less than 1%. Similarly, the signing of Executive Order 13163 in the Clinton administration—an order with identical objectives as Order 13548—did little to increase disability representation in the executive branch. These realities can be viewed in Figure 3:

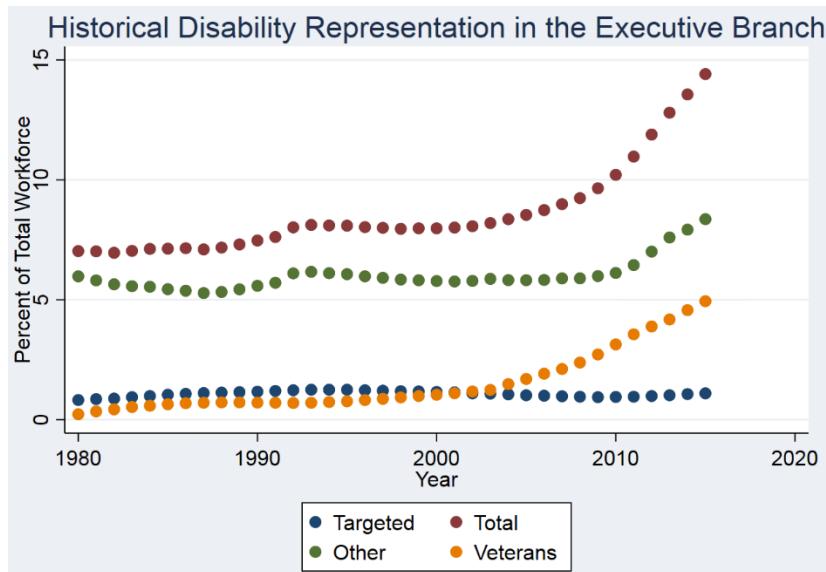


Figure 3: Historical Disability Representation in the Executive Branch

In Figure 3, the maroon dots represent all full-time, non-seasonal employees with disabilities as a percentage of the total federal workforce. As can be seen, there was a dramatic increase in the years following Executive Order 13548 in 2010. The other colors represent the three disability categories specified by the OPM—targeted, non-targeted, and service-related.

It is notable that the percentage of disabled veterans working for the government has been climbing steadily since 2000, when President Clinton signed Executive Order 13163. This order was not as effective for non-targeted disabilities, which did not increase significantly as a percentage of the federal workforce in 2010. Meanwhile, people in the “targeted” category—those whose disabilities have historically excluded them from meaningful employment—seem to have been little affected by Order 13548.

The above data includes only full-time, non-seasonal employees who are already working for the federal government. In comparing this data to newly hired employees after 2010, it becomes clear that an effort was made to continually diversify the federal workforce. See Table 3 for a comparison of representative ratios (RR) for current employees and new hires. (Recall that RR value of less than 1.0 indicates that disabled employees are underrepresented; greater than 1.0 indicates overrepresentation.)

Table 3: Representative ratios, current employees and new hires, all disability types 2010 – 2015

Year	Current Employees	New Hires
2015	1.46	1.93
2014	1.37	2.00
2013	1.30	1.84
2012	1.20	1.65
2011	1.11	1.48
2010	1.03	1.26

Table 3 is insightful (and perhaps uplifting) in two ways. First, annual new hires are consistently more representative of disabled Americans than current employees. Second, both new hires and current employees are generally becoming more representative each year. Combined, these factors suggest that the federal government not only complied with Order 13548 but made an active effort to diversify the workforce.

Unfortunately, the ratios provided in Table 3 are slightly deceiving. It appears, given only these numbers, that the government *overrepresents* the U.S. disabled labor force. (If this were true, there would be no problem, and I would have no paper to write.) Examining these numbers, it may seem that Order 13548 was uncalled for, as disabled people were overrepresented the year it was signed. These findings are deceiving because they include the total disability population, without distinguishing between disability categories. A more accurate depiction of the diversity of new hires is provided in Table 4.

Table 4: Representative ratios for new hires, by disability category, 2010 – 2015.

Year	Targeted Disabilities	Non-Targeted Disabilities	Disabled Veterans
2015	0.26	2.11	12.20
2014	0.28	2.32	11.80
2013	0.27	2.30	9.83
2012	0.22	1.95	9.61
2011	0.18	1.63	9.51
2010	0.16	1.29	8.62

Here, the upward trajectory still holds true; with each year, the federal government tends to hire a more diverse set of employees in terms of disability status. This is particularly true of veterans and individuals with non-targeted disabilities. Targeted disabilities, however, remain stubbornly underrepresented in the federal workforce.

It is worthwhile to examine representation at the agency level as well. Trends that appear at the bureaucracy-wide level may not be true for specific agencies. Table 5 ranks Cabinet-level agencies and agencies with 1,000+ employees in terms of their representative ratios.

Table 5: Representative ratio rankings by agency, sorted according to targeted disabilities. Current employees only. 2015.

Agency	Targeted Disabilities	Non-Targeted Disabilities	Disabled Veterans
Total, All Agencies	0.22	1.93	7.02
Equal Employment Opportunity Commission	0.74	3.65	8.32
Environmental Protection Agency	0.50	1.16	1.19
Department of Veterans Affairs	0.44	2.88	6.92
Social Security Administration	0.40	1.88	3.44
National Archives and Records Administration	0.37	2.11	5.12
Department of the Treasury	0.36	1.76	1.90
Department of Labor	0.30	2.22	5.89
Federal Communications Commission	0.28	1.02	1.24
Department of Education	0.26	1.48	2.32
Department of Defense	0.26	2.29	10.36
National Science Foundation	0.25	1.87	2.73
Government Printing Office	0.24	1.56	2.46
Department of Health and Human Services	0.23	1.57	2.14
Department of Agriculture	0.23	1.94	2.42
National Aeronautics and Space Administration	0.23	1.33	1.55
Department of Housing and Urban Development	0.22	1.88	3.79
Department of the Interior	0.21	1.71	3.02
Office of Personnel Management	0.21	1.87	6.93
Small Business Administration	0.20	1.91	4.56
National Credit Union Administration	0.20	2.04	5.44
Securities and Exchange Commission	0.19	1.06	1.33
U.S. AID	0.17	0.96	2.59
Nuclear Regulatory Commission	0.17	1.42	2.04
Smithsonian Institution	0.17	1.34	1.77
General Services Administration	0.16	1.41	4.88
Federal Reserve System	0.16	1.86	3.93
Department of Transportation	0.16	1.60	4.10
Department of Commerce	0.15	1.36	1.65
Department of Energy	0.14	1.90	3.76
U.S. Navy	0.14	1.80	10.82
Federal Trade Commission	0.13	1.36	0.67
National Labor Relations Board	0.13	1.13	1.13
U.S. Air Force	0.13	2.44	9.15
Broadcasting Board of Governors	0.12	0.49	0.97
U.S. Army	0.12	1.81	14.59

Federal Deposit Insurance Corporation	0.12	1.09	1.77
Department of State*	0.10	1.20	5.60
Department of Homeland Security	0.09	1.16	4.79
Department of Justice	0.08	0.97	3.83
Court Services and Offender Supervision Agency	0.07	1.48	2.35

*Note: Department of State data unavailable for 2015. Substituted data from 2014.

Despite great variation in the representativeness of these selected agencies, targeted disabilities are consistently underrepresented. None of these 41 agencies had an RR value greater than or equal to one for targeted disabilities. Meanwhile, disabled veterans are overrepresented in nearly all selected agencies.

It is notable too that there does not appear to be a relationship between representativeness in one category and representativeness in another. That is, if an agency overrepresents targeted disabilities, it will not necessarily overrepresent the other two categories as well. (Consult Appendix C for the approximate relationship between RR values in targeted disabilities and disabled veterans.) Despite the absence of such a relationship, RR values do not appear randomly distributed between the agencies. It may be unsurprising to readers that the Army, Navy, Air Force, and Department of Veterans Affairs lead the executive branch in representation of disabled veterans. (Note: These totals do not include active-duty troops, but rather the federal employees involved in the administration defense-related agencies.) Similarly, it may be unsurprising that the Equal Employment Opportunity Commission—the agency responsible for ensuring equal rights for people with disabilities under the ADA—leads all agencies in overall representativeness.

Part II: Promoting

To be considered a model employer, the federal government must offer *quality* employment, not just quantity, and offer its disabled employees legitimate opportunities for advancement. This paper assumes that, in a fully accessible and inclusive environment, disabled employees would exist at every level of the workplace hierarchy. These employees are competent and contributing members of any organization should be compensated accordingly.

Table 6: Representative ratios by General Schedule and disability type, 2015.

Grades	Targeted Disabilities	Other Disabilities	Disabled Veterans
GS 1-5	0.62	3.04	8.88
GS 6-10	0.34	2.53	9.22
GS 11-15, SES*	0.17	1.76	6.98

*SES = Senior Executive Service, the highest rank in the government pay scale

In 2015—five years after Order 13548 was signed, and one year before the OPM declared the success of its implementation—people with disabilities were hopelessly relegated to the lowest levels of the bureaucratic hierarchy. As can be seen in Table 6, the lowest five Grades in the General Schedule are the most representative of people with disabilities. The highest five, including the Senior Executive Service, are the least representative. This trend seems most dire for people with targeted disabilities, who, in the highest-paid positions, are underrepresented by a factor of five.

The silver lining to this data is that it does appear to be improving over time. In Table 7, the RR values of the highest pay scale levels are shown for each disability category. In 2015, these top positions appear to be more representative than they were just two years ago. For disabled veterans and individuals with non-targeted disabilities, the improvements were significant. For individuals with targeted disabilities, the improvements were slight.

Table 7: Representative ratios of GS 11-15 and SES by year, disability type. 2013 – 2015.

Year	Targeted Disabilities	Non-Targeted Disabilities	Disabled Veterans
2015	0.17	1.76	6.98
2014	0.16	1.67	6.44
2013	0.15	1.60	5.90

Alone, these numbers may seem unbearable. What has been described thus far is that people with targeted disabilities have been excluded from the representative gains from Order 13548 and relegated to the lowest positions in the bureaucratic hierarchy. These employees are trapped in low-wage positions and have been given no influence over the policy implementation process, and thus cannot use its power to deliver tangible benefits to the communities they come from. They have been treated, in other words, as cogs in the bureaucratic machine.

The above numbers may serve to some as a thorough enough examination of disability representation in the federal workforce. What is missing, in my opinion, is how disabled employees feel about their roles in the bureaucracy. Do they feel they have opportunities for advancement? Do they feel trapped in low-wage positions? To answer these questions, I captured data from the annual Federal Employee Viewpoint Survey.

Table 8 includes the aggregate opinions of disabled and non-disabled survey respondents for seven selected prompts. Negative values indicate that, overall, respondents feel negatively about the information in a prompt. The opposite is true for positive values. Negative “Difference” values imply that disabled respondents feel worse about the prompt than their non-disabled peers.

Table 8: Disabled vs. Non-Disabled responses to the Federal Employee Viewpoint Survey, 2019.

22. “Promotions in my work unit are based on merit.”	Disabled	Non-Disabled	Difference
	-0.08	+0.03	-0.11
25. “Awards in my work unit depend on how well employees perform their jobs.”	Disabled	Non-Disabled	Difference
	+0.03	+0.12	-0.09
33. “Pay raises depend on how well employees perform their jobs.”	Disabled	Non-Disabled	Difference
	-0.17	-0.14	-0.04
65. “How satisfied are you with the recognition you receive for doing a good job?”	Disabled	Non-Disabled	Difference
	+0.11	+0.21	-0.10
67. “How satisfied are you with your ability to get ahead in your community?”	Disabled	Non-Disabled	Difference
	-0.05	+0.06	-0.11

69. "Considering everything, how satisfied are you with your job?"

Disabled	Non-Disabled	Difference
+0.31	+0.38	-0.07

70. "Considering everything, how satisfied are you with your pay?"

Disabled	Non-Disabled	Difference
+0.22	+0.29	-0.07

As can be seen, there are no positive difference values. For every selected prompt, disabled respondents feel worse than their non-disabled peers—a strong indication that disabled employees are aware of the non-meritocratic nature of the bureaucratic hierarchy. A limitation of this survey data is that its respondents cannot be divided into the three disability types. As it appears now, the data records total responses for all three disability types. I expect, though I cannot say with certainty, that a table of isolated responses for individuals with targeted disabilities would appear far more negative.

One positive finding from the FEVS data is the fact that, over time, disabled respondents tend to answer the prompts more positively. (See Figure 4.) While I would like to attribute this upward trajectory to the effects of Order 13548, it is true that responses of non-disabled employees are also becoming more positive with time. Thus, the difference between these responses (pictured in Figure 4 in maroon) remains relatively constant for the eight years examined.

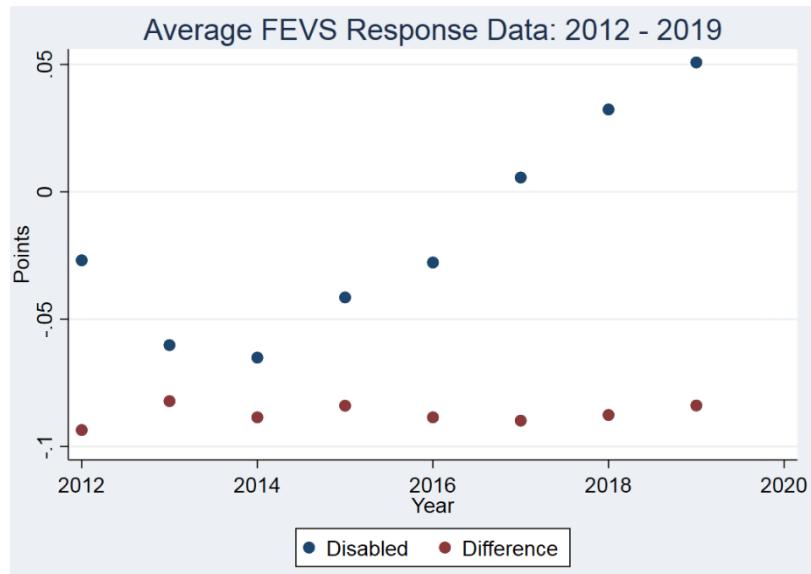


Figure 4: Average FEVS Response Data: 2012-2019

Brief Summary of Findings: Three Lessons Learned

A model employer must hire in both quantity and quality. In this section, I hoped to find that the government had hired people with disabilities in numbers that reflect their prevalence in the American workforce, and that these employees had been given legitimate opportunities for advancement. According to publicly available data from the Office of Personnel Management, Order 13548 was effective at increasing the percentage of federal positions occupied by disabled employees—but little more. Five years after the signing of Order 13548:

- Individuals with targeted disabilities are underrepresented at every level of the bureaucratic hierarchy, especially in the most senior-level positions.
- Gains in disability employment remain unevenly distributed among the largest agencies in the executive branch.
- Survey data reveals that federal employees with disabilities are less satisfied with their jobs and at their ability to excel in the workplace.

Given these findings, one must admit that the federal government is not a model employer of people with disabilities. It underrepresents employees with targeted disabilities and does not allow them to advance in the hierarchy—a fact reflected in the surveyed attitudes of disabled employees. In the following section, I provide policy recommendations to address the more unsettling findings in this paper.

Recommendations

My findings strongly suggest that individuals with targeted disabilities have been excluded from the benefits of Executive Orders 13163 and 13548. Recommendations in this section will therefore focus on this disability category. In 2008, the Office of Federal Operations (OFO) published a report, “Improving the Participation Rate of People with Targeted Disabilities in the Federal Workforce.” Its findings helped identify the failures of President Clinton’s Order 13163 and later formed the basis of President Obama’s Order 13548. In this section, I summarize the recommendations of the OFO report and identify those that have not been successfully implemented in the past decade.

The OFO report began with the understanding that “unfounded fears, myths, and stereotypes persist regarding the employment of people with disabilities” and that these stereotypes affect employment decisions, including in the federal government (OFO 2008, vi). I suspect that these stereotypes account for some of the findings of the previous section. I note this here only to call attention to the stigma people with disabilities—especially those with targeted disabilities—continue to face, more than ten years after this report was drafted. Unfortunately, I cannot recommend policies to change unfair attitudes and opinions.

Among the recommendations in the 2008 report are the following:

- Improve coordination among agencies: “Partner agencies (including OPM and EEOC) should appoint a single coordinator, who will act as a point of contact for other agencies and the public, and serve as a clearinghouse of information on people with targeted disabilities in the federal government” (24).
- Demonstrate top-level commitment: “Agencies should establish an advisory committee that addresses all disability-related issues in the agency” (27).
- “Encourage persons with disabilities to self-identify and ensure this information remains confidential” (28).
- Recognize success: “Partner agencies should establish an award for the federal agencies with the best improved participation rate of people with targeted disabilities in their workforce” (32).

Several of the report’s recommendations were accepted into the drafting of Order 13548. For example, the Order did improve coordination among agencies; it set itself apart from Order 13163 when it demanded that “The Director of the Office of Personnel Management, in consultation with the Secretary of Labor and the Chair of the Equal Employment Opportunity Commission, shall identify and assist agencies in implementing strategies” (Obama 2010). Order 13548 also demanded a top-level commitment, specifically demanding that each agency designate a senior-level official to be held accountable for disability employment, recruitment, and retention.

There are several areas, however, where Order 13548 falls short of the recommendations of the 2008 OFO report. Rather than encourage disability self-identification among current employees, the Order focused on hiring new employees who already self-identified. I believe this was a lost opportunity to emphasize the inclusivity of the workplace.

Though Order 13548 set specific, measurable markers of success, it failed to set *meaningful* markers of success. Recall that the original goal was to hire 100,000 disabled employees in five years. This goal is specific and measurable. It does not, as we have seen, make the federal government a model employer. This goal fails to mention opportunities for

advancement, and it fails to create a positive incentive structure to continually hire disabled employees after five years.

When federal agencies are issued a challenge with nothing but a numerical benchmark—in this case, 100,000 new hires over 5 years—it is inevitable that little attention is paid to quality employment. It makes sense that some agencies, specifically those who oversee the military, hire from their pre-existing network of veterans, rather than seek out talent in unfamiliar places.

Given these and other shortcomings, I recommend that the president sign a new Executive Order with the following provisions:

- **Meaningful Goal Setting:** The goal of 100,000 new employees with disabilities over 5 years was insufficient to make the federal government a model employer for three reasons. 1) It did not mention targeted disabilities. 2) It did not mention opportunities for advancement. 3) It failed to create a lasting, positive incentive structure. I recommend giving annual salary increases to senior-level officials responsible for the successful hiring and promotion of individuals with targeted disabilities.
- **Consistency:** Order 13548 ordered that senior-level officials from each agency be responsible for developing and implementing a disability employment plan. This decentralized planning structure resulted some agencies being more representative than others. I recommend that senior-level officials within the EEOC and OPM be responsible for developing and implementing these plans alongside agency executives, thus creating more consistency.
- **Self-Identification:** Encouraging federal employees to self-identify serves as a reminder that their workplace is accessible and inclusive. It is also one way to increase disability representation without the costs associated with recruitment. I recommend a mandatory, agency-wide re-survey of disability identification every two to four years. This survey should be accompanied by a reaffirmation of the agency's commitment to inclusivity, accessibility, and confidentiality.

Conclusion

Executive Order 13548 represents one of the most significant federal actions on disability rights since the passage of the Americans with Disabilities Act in 1990. In many ways, it accomplished the goals set forth in President Clinton's Executive Order 13163, ten years prior. From 2010 to 2015, the government hired more than 100,000 employees with disabilities. This is a tremendous accomplishment, and it should be celebrated.

Meanwhile, federal employees in the targeted category—whose disabilities have historically excluded them from meaningful employment—did not share in the gains of Order 13548. They remain underrepresented in all large federal agencies, and they have been hopelessly relegated to the lowest positions in the bureaucratic hierarchy. Survey data of federal employees confirms a sense of frustration at being second-class employees.

This paper recommends a third Executive Order to succeed where Orders 13163 and 13548 failed. This paper also recognizes that it has not exhausted the potential for research on disabled federal employees. In future research, scholars of representative bureaucracy should examine the relationship between increased representation of disabled bureaucrats and policy implementation activities. The EEOC is one of four federal agencies tasked with implementing and enforcing the ADA. The EEOC is also one of the most representative agencies in the federal government in terms of disability employment. As it has become more diverse, have its employees taken a more active and energized approach to enforcing the ADA?

During the ADA signing ceremony, President Bush famously declared: “Let the shameful walls of exclusion finally come tumbling down.” It is not certain when those walls will come fully down. Until then, the federal government must take an active interest in their demolition. The federal government can become a model employer for people with disabilities, setting an example for the private sector and indeed the rest of the world.

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Appendix

Appendix A: Self Identification of Disability (SF 256)

SELF-IDENTIFICATION OF DISABILITY <small>(Please read the Privacy Act information and additional instructions on Page 2)</small>		
Name (Last, First, Middle Initial)	Date of Birth (MM/YYYY)	Social Security Number
Purpose: <p>Each agency in the Executive Branch of the Federal government has established programs to facilitate the hiring, placement, and advancement of individuals with disabilities. Self-identification of disability status is essential for effective data collection and analysis of the Federal government's efforts. While self-identification is voluntary, your cooperation in providing accurate information is critical to these efforts. Every precaution is taken to ensure that the information provided by each employee is kept in the strictest confidence.</p>		
ENTER CODE HERE → <input type="text"/> <input type="text"/>		
Targeted Disabilities or Serious Health Conditions: <ul style="list-style-type: none"> 02- Developmental Disability, for example, autism spectrum disorder 03- Traumatic Brain Injury 19- Deaf or serious difficulty hearing, benefiting from, for example, American Sign Language, CART, hearing aids, a cochlear implant and/or other supports 20- Blind or serious difficulty seeing even when wearing glasses 31- Missing extremities (arm, leg, hand and/or foot) 40- Significant mobility impairment, benefiting from the utilization of a wheelchair, scooter, walker, leg brace(s) and/or other supports 60- Partial or complete paralysis (any cause) 82- Epilepsy or other seizure disorders 90- Intellectual disability 91- Significant Psychiatric Disorder, for example, bipolar disorder, schizophrenia, PTSD, or major depression 92- Dwarfism 93- Significant disfigurement, for example, disfigurements caused by burns, wounds, accidents, or congenital disorders 	Other Disabilities or Serious Health Conditions: <ul style="list-style-type: none"> 13- Speech impairment 41- Spinal abnormalities, for example, spina bifida or scoliosis 44- Non-paralytic orthopedic impairments, for example, chronic pain, stiffness, weakness in bones or joints, some loss of ability to use part or parts of the body 51- HIV Positive/AIDS 52- Morbid obesity 59- Nervous system disorder for example, migraine headaches, Parkinson's disease, or multiple sclerosis 80- Cardiovascular or heart disease 81- Depression, anxiety disorder, or other psychiatric disorder 83- Blood diseases, for example, sickle cell anemia, hemophilia 84- Diabetes 85- Orthopedic impairments or osteo-arthritis 86- Pulmonary or respiratory conditions, for example, tuberculosis, asthma, emphysema 87- Kidney dysfunction 88- Cancer (present or past history) 94- Learning disability or attention deficit/hyperactivity disorder (ADD/ADHD) 95- Gastrointestinal disorders, for example, Crohn's Disease, irritable bowel syndrome, colitis, celiac disease, dysphagia 96- Autoimmune disorder, for example, lupus, fibromyalgia, rheumatoid arthritis 97- Liver disease, for example, hepatitis or cirrhosis 98- History of alcoholism or history of drug addiction (but not currently using illegal drugs) 99- Endocrine disorder, for example, thyroid dysfunction 	
Other Options: <ul style="list-style-type: none"> 01- I do not wish to identify my disability or serious health condition. 05- I do not have a disability or serious health condition. 06- I have a disability or serious health condition, but it is not listed on this form. 		

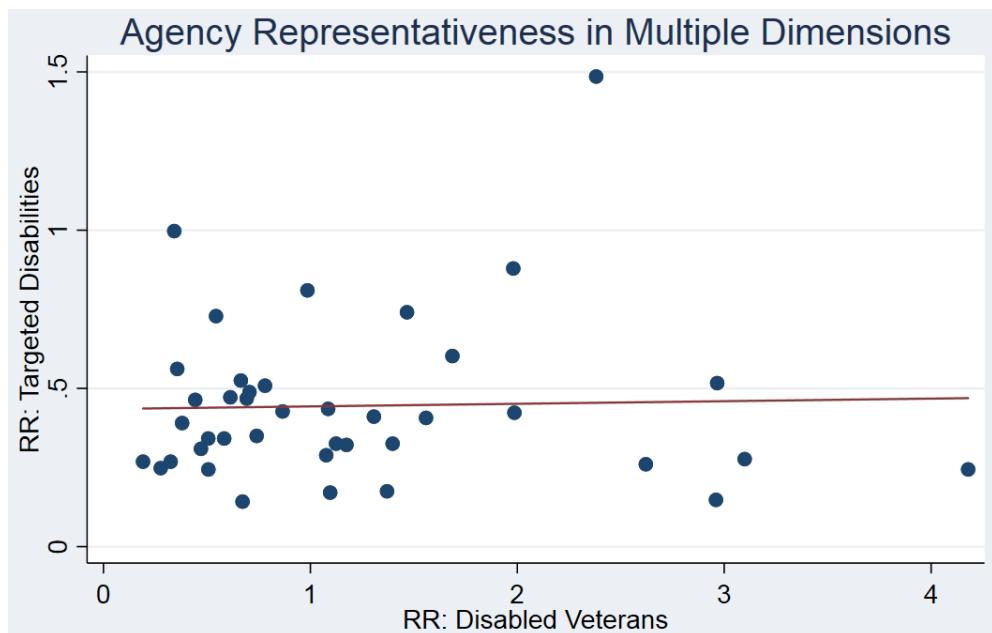
Appendix B

*Appendix B: United States Disability Statistics, 2010**
(Numbers in Thousands)

	All Disabilities	Targeted	Non-Targeted	Service-Related
Total in US (Age 21-64)	29,479	19,695	8,338	1,445
% of All Americans (21-64)	16.63%	11.11%	4.70%	0.81%
% Not Prevented from Work	59.38%	44.50%	92.20%	86.33%

(Brault 2012; Department of Veterans Affairs 2011)

Appendix C



Appendix C: Agency Representativeness in Multiple Dimensions. (Agencies who represent one disability category do not necessarily represent another.)