

Insights, News & Events

# DOL'S DISABILITY SELF-ID FORM HAS BEEN RENEWED DESPITE ROLLBACKS ON DATA COLLECTION: 5 STEPS FOR FEDERAL CONTRACTORS

Insights  
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## DOL's Disability Self-ID Form Has Been Renewed Despite Rollbacks on Data Collection: 5 Steps for Federal Contractors

The federal government recently approved the Department of Labor's Voluntary Self-Identification of Disability Form (Form CC-305) for continued use through July 2029, ensuring federal contractors continue collecting this information. The news comes as the government aims to roll back other demographic reporting obligations. Here's what happened, why the timing is significant, and five steps federal contractors should consider taking now.

**[IMPORTANT Editor's Note: A new rule, effective September 21, effectively ends the use of the mandatory disability self-identification invitation (the CC-305 form). Even though the CC-305 is approved for use into 2029, doing so runs afoul of the Americans with Disabilities Act as of September 21, 2026. Consult your employment attorney for additional advice – particularly on the differences between actively soliciting disability information via form CC-305 and other considerations for existing disability data. You can read about these changes and more in our insight here.]**

### What Just Happened?

The Office of Management and Budget (OMB) extended the DOL's disability self-identification data collection requirements under Section 503 of the Rehabilitation Act –

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the federal law that prohibits disability discrimination by federal contractors – for another three years. Form CC-305, the Voluntary Self-Identification of Disability Form, now expires on July 31, 2029.

## Service Focus

### Government Contracting, Compliance, and Reporting

The prior form had lapsed, leaving federal contractors confused as to whether they should keep using the expired form or stop collecting the data. But the DOL recently posted guidance on its website informing federal contractors that the form remained valid for use while under OMB review.

OMB has now renewed the CC-305 form, which confirms that covered federal contractors should continue providing it to job applicants and employees and collecting responses. The form itself is unchanged from the prior version, which was updated in April 2023 with an expanded list of example disabilities and response options. You can find the current form on the [Office of Federal Contract Compliance Program's \(OFCCP's\) self-identification form page](#).

**You can read about the key 2023 changes to the form in our insight here: [Attention Federal Contractors: Revision of Disability Self-ID Form Required ... 4 Steps to Take Ahead of the Effective Date](#)**

## Who Is Covered?

The OFCCP's regulations still require federal contractors with more than 100 employees to set a utilization goal of 7% of the employees in each job group identifying as an individual with disabilities. Federal contractors with 100 or fewer employees may use the 7% goal for the entire workforce. Notably, by expanding the disability examples, the 2023 revisions gave more ways to self-identify as individuals with disabilities and likely helped to meet this goal.

## How Does This Fit With Recent Federal Changes?

The renewal's timing is notable because of everything happening around it. Over the past year and a half, the federal government has scaled back several long-standing reporting requirements:

- The administration rescinded [Executive Order 11246's affirmative action requirements](#) related to minorities and women.

- More recently, the EEOC [proposed scrapping EEO-1 reporting requirements](#) related to workforce demographic data, a change the agency estimates would impact over 100,000 private employers.

Requirements under Section 503 and the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA), however, [have remained in full force](#), including their nondiscrimination, recordkeeping, and affirmative outreach obligations.

## A Development to Track

The DOL published a proposed rule last year to modify Section 503 regulations. That rulemaking is separate from the recent OMB form renewal but could eventually change certain Section 503 obligations by eliminating voluntary self-identification of disabilities and the 7% utilization goal discussed above.

This rule has not yet been finalized, so the current requirements will remain in place for now. We'll be monitoring that proposal and will report on any changes that affect your obligations. Make sure you are subscribed to [Fisher Phillips' Insight System](#) to get the most up-to-date information.

## 5 Steps for Federal Contractors to Take Now

- 1. Use the current CC-305 form.** Get [the latest form from the OFCCP](#) and ensure it's refreshed in your applicant and employee systems.
- 2. Keep collecting data as required.** Offer the form to applicants at the pre-offer and post-offer stages, and to your current workforce at least every five years, with a reminder at least once in the interim period when you are not collecting the data.
- 3. Check your electronic version.** An electronic form must reproduce all required language verbatim in a sans serif font of at least 11 points, so be sure to update the expiration date.
- 4. Track additional changes from the federal government.** Federal contractor reporting rules could change, so monitor developments closely and continue to confirm your ongoing obligations.

**5. Consult with counsel.** As rules continue to evolve, your FP attorney can help you develop a comprehensive compliance plan.

## **Conclusion**

Fisher Phillips will continue to monitor developments affecting federal contractors. Make sure you are subscribed to [Fisher Phillips' Insight System](#) to get the most up-to-date information. If you have questions, contact your Fisher Phillips attorney, the authors of this Insight, or any member of our [Government Contracting, Compliance, and Reporting Practice Group](#).