



AMERICAN  
PSYCHOLOGICAL  
ASSOCIATION

June 4, 2007

Barbara J. Grove, RN  
National Nurse Consultant  
Office of Job Corps  
Room N-4456  
200 Constitution Avenue, NW  
Washington, D.C. 20210

RE: Job Corps Health Questionnaire, ETA 6-53

Dear Ms. Grove:

On behalf of the 148,000 members and affiliates of the American Psychological Association (APA), I would like to thank you for the opportunity to comment on the Proposed Information Collection Request regarding Job Corps Health Questionnaire Form ETA 6-53 published in the Federal Register on April 3, 2007.

APA is the largest scientific and professional organization representing psychology in the United States and is the world's largest association of psychologists. APA works to advance psychology as a science, a profession, and a means of promoting human welfare. As such, issues impacting individuals with disabilities are of great importance to our members. This is reflected in part by the Committee on Disability Issues in Psychology, the Committee on Ethnic Minority Affairs, and various other elected governance groups charged with addressing disability and ethnic minority issues.

Given the extremely high unemployment rate among Americans with disabilities of working age, particularly among those individuals from diverse racial and ethnic minority groups, there is a definitive need to focus significant resources on promoting strategies that will engage and maintain these individuals in the competitive labor market.

The Job Corps Program is one of the largest and most successful residential education and vocational training programs for economically disadvantaged youth. More than eighty-seven percent of its graduates place in jobs, enroll in full time education, or enlist in the military. Job Corps provides vocational, academic, and life skills training to more than 65,000 youth each year and more than seventy percent of them are from minority backgrounds.

However, APA is concerned about Job Corps Health Questionnaire Form ETA 6-53 – particularly the questions related to the applicant's mental health treatment at the present time and during the past two years (# 8.a, b, f, h j, k, m, o, p, q, v, and w) as well as those that ask whether the applicant has ever had certain mental health-related "conditions" (# 9.n, o, q, v, s, t, u, v, w, x, y, and z).

The stated purpose of these proposed questions is “to determine whether an otherwise-eligible applicant offered enrollment may pose a direct threat to self or others.” (Supporting Statement, § A.2). However, these questions do not relate to assessing whether an applicant poses a direct threat. To the contrary, these questions could reinforce inaccurate and potentially dangerous stereotypes of people with mental health problems. In addition, they could potentially discriminate against Job Corps candidates by imposing an additional burden on certain applicants to satisfy unfounded eligibility criteria. (Clark, 880 F. Supp. at 442).

People with mental health problems, particularly those from diverse racial and ethnic minority backgrounds, may be inappropriately targeted by this rule despite important facts revealed by a large body of research, including the following:

- Those with mental health problems pose no meaningful addition of risk to the physical safety of the general population. (Steadman, NJ, Mulvey, EP, Monahan, J., et al, 1998).
- A diagnosis is not, in and of itself, a clear predictor for future behavior. Questioning should focus attention on the individual’s capacity to carry out his or her academic or employment responsibilities (Alikhan, 2001).
- Ethnic and racial minorities tend to have disabling conditions at a disproportionately high rate and experience twice the discrimination experienced by non-disabled people in the minority community. Both disability and race complicate the situation. (Smart, J.; Smart, D, 1997; and Wright, 1988).
- Culture influences many aspects of mental illness, including how patients from a given culture express and manifest their symptoms, their style of coping, their family and community supports, and their willingness to seek treatment. (Surgeon General’s Report, 2001)
- Fears that an individual with a mental health problem has a greater propensity for violence are based more in myth than in reality. (Angermeyer, 2000; Link, Phelan, Bresnahan, Stueve, & Pescosolido, 1999; Taylor & Monahan, 1996).
- Research suggests that stereotypes of dangerousness are actually on the increase and that the stigma of mental illness remains a powerfully detrimental feature of the lives of people with such conditions. (Link et al., 1999, p. 1328).

As previously stated, the employment situation for individuals with disabilities is already problematic, and even more so for individuals with disabilities from diverse racial and ethnic minority backgrounds. Such broad mental health questions amplify the stigmatization of these individuals and may have the adverse effect of deterring mental health treatment. Faced with the prospect that their treatment history will have to be disclosed, prospective Job Corps applicants may be less likely to seek much needed treatment and/or be less than forthcoming to discuss mental health problems. (Reske, 1995, p. 24).

Based on the available research, the answers to the questions in the proposed Job Corps questionnaire could have the unintended consequence of disqualifying an eligible applicant from the program and further disenfranchising an already disadvantaged population.

APA strongly urges that the Department to support appropriate individualized assessments of an applicant's ability to safely meet the essential requirements of the Job Corps program and to not adopt these proposed changes to the Job Corps Health Questionnaire.

Thank you for the opportunity to comment on this matter. If you have any questions regarding our comments, please contact Day Al-Mohamed, J.D., of our Government Relations Office at (202) 336-6061.

Sincerely,



Annie Toro, J.D., M.P.H.  
Associate Executive Director  
Public Interest Directorate

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