

# Business Strategies that Work:

A FRAMEWORK FOR DISABILITY INCLUSION



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## INTRODUCTION

What's the third largest market segment in the United States? The answer might surprise you. It's not a particular race, gender, or age group. It's people with disabilities. The size of this population—54 million strong—surpasses Hispanics, African Americans and Asian Americans, as well as Generation X and teens. Add in their families, friends, and associates, and you get a trillion dollars in purchasing power.

Want a slice? Any smart business owner would. As with any customer segment, one of the best ways to tap into the disability market is to ensure it is represented in your workforce. Employees with disabilities can help businesses understand and meet the needs of this important and expanding customer base. What's more, research shows that consumers both with and without disabilities favor businesses that employ people with disabilities, and that people with disabilities can provide your business with the flexible, innovative thinking required for a competitive edge in the 21st century.

Business Strategies that Work identifies promising employment policies and practices for recruiting, hiring, retaining, and advancing qualified individuals with disabilities. It is a guide for employers who want to ensure that their workplaces are truly diverse and inclusive. And it is a valuable tool, with proactive and dynamic human resource strategies, for employers who want to be successful in today's diverse and global markets.

The strategies found in this document are used by employers who make a strong business case for employing people with disabilities. By identifying, adopting, and refining these effective and meaningful employment practices that welcome people with disabilities, you too can benefit from having a vibrant, diverse workforce.

These practices are organized into seven action areas:

- Lead the Way: Inclusive Business Culture
- Hire (and Keep) the Best: Personnel Processes
- Ensure Productivity: Reasonable Accommodation Procedures
- Build the Pipeline: Outreach and Recruitment
- Communicate: External and Internal Communication of Company Policies and Practices
- Be Tech Savvy: Accessible Information and Communication Technology
- Grow Success: Accountability and Continuous Improvement Systems

*\*Note that the strategies contained in this document do NOT create any new legal requirements or change current ones.*

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## LEAD THE WAY: INCLUSIVE BUSINESS CULTURE

Commitment at all levels of an organization is critical to creating and maintaining a truly diverse and inclusive work environment. Establishing an inclusive business culture begins with leadership at the highest levels, including top executives, their leadership teams, and boards of directors. Mid-level managers and supervisors, and particularly human resources staff and other personnel involved in hiring decisions, must also understand the role they play in facilitating an inclusive environment. Finally, communicating the company's goal of an inclusive and diverse workplace to employees at all levels of the organization and indicating what they can do to help are also extremely important. One action company leaders can take is to adopt formal expressions of commitment and intent related to the recruitment, hiring, retention, and advancement of qualified individuals with disabilities, including veterans with disabilities. Successful approaches large and small employers have used in this area include the following:

1. Developing and communicating policy statements and other illustrations of the company's commitment to inclusion of workers with disabilities. (For example, "Business is becoming increasingly global. As "COMPANY A" continues to expand, our differences—from our culture and work habits, communication style, and personal preferences—are becoming even more essential to our business strategy. We are working hard to create an environment in which all employees are valued and respected, including those with disabilities.")
2. Establishing an enterprise-wide team consisting of executives, managers, and employees with disabilities to support and advance the recruiting, hiring, retention, and promotion of individuals with disabilities. This team may also function as a disability-focused employee resource group (ERG) or affinity group.
3. Making (and publicizing) the business case for employing qualified individuals with disabilities. (For example, framing the issue in communication with managers, employers, etc. in terms of return on investment and direct and indirect benefits to the company and its employees; stressing that enhancing diversity by employing people with disabilities recognizes changing demographics of the workforce; improving employee engagement, productivity, and reduction of costs; and enhancing retention and advancement).
4. Including disability as part of all of the company's diversity policies and activities. This includes using the words "disability" and "people with disabilities" in statements defining the company's diversity policies, inviting disability organizations and people with disabilities to the company's diversity events, and recognizing that people with disabilities are part of the company's other diverse communities (including racial and ethnic minorities, veterans, and the LGBT community).

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5. Affirming in policy statements the company's commitment to equal employment opportunity for people with disabilities and taking affirmative steps to employ, retain, and advance qualified individuals with disabilities at all levels.
  6. Encouraging workers with disabilities and other employees to identify barriers and individual and systemic concerns without fear of reprisal, and also providing mechanisms to allow them to provide this information anonymously or confidentially.
  7. Establishing a universal policy providing workplace flexibility and accommodations for all applicants and employees, with and without disabilities, including the use of telework options, if appropriate.

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## **HIRE (AND KEEP) THE BEST: PERSONNEL PROCESSES**

It is important for businesses to review their personnel processes, qualification standards, and job descriptions (including the essential functions of each position) to determine whether they facilitate or impede the hiring and advancement of qualified persons with disabilities, including veterans with disabilities. Examples of personnel processes that have proven successful include the following:

1. Adopting a policy that permits asking applicants to voluntarily “self-identify” as a person with a disability IF the company is undertaking affirmative action for people with disabilities (either voluntarily consistent with a state or local law that permits or encourages affirmative action for individuals with disabilities or under federal, state, or local law requiring it). It is important to note that employers are prohibited from making pre-employment inquiries about disability in most other circumstances.
2. Indicating in job announcements that the company encourages applications by qualified individuals with disabilities. The announcement may include the universal access symbol for emphasis.
3. Considering applicants with disclosed disabilities for all available positions for which they may qualify, when the position(s) applied for is unavailable.
4. Adopting a hiring/promotion policy that includes disability among the positive selection factors or that provides priority consideration to qualified individuals with disabilities.
5. Providing opportunities for practice interviews for job seekers with disabilities referred by community-based organizations who meet qualification standards, as a way of identifying potential candidates for current or future job vacancies.
6. Adopting an internal targeted recruitment initiative to fill vacancies with individuals with disabilities. This may include a review of employment records to identify qualified employees with disclosed disabilities available for promotions or desirable transfers so that their present and potential skills are fully used and developed.
7. Providing training opportunities, including apprenticeship programs, on-the-job training, job shadowing, and tuition reimbursement for current employees with disabilities.

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8. Providing training to executives, managers, and line staff about strategies such as workforce flexibility, including customized employment around job tasks (job restructuring, job sharing, and job creation).
  9. Participating in internship, mentorship, and hiring programs for students and recent graduates with disabilities.
  10. Developing emergency management plans that specifically address the needs of employees with disabilities. For example, developing practical guidelines for emergency managers and employees to plan for workplace emergencies addressing issues such as communication about and distribution of the plan, employer responsibilities, first responder responsibilities, employee self-determination, and emergency notification strategies.
  11. Reviewing personnel processes and their implementation on an annual basis and making necessary modifications or improvements, when appropriate.

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## **ENSURE PRODUCTIVITY: REASONABLE ACCOMMODATION PROCEDURES**

Some individuals with disabilities may need “reasonable accommodations” in order to perform the essential functions of a job. Federal law and regulations define employers’ obligations to provide reasonable accommodations. According to the Job Accommodation Network (JAN), more than half of all accommodations cost nothing. Furthermore, JAN’s statistics show that most employers report financial benefits in the form of reduced insurance and training costs and increased productivity.

It is important for employers to consider the procedures and administrative mechanisms they use to ensure effective and efficient implementation of accommodations. Examples of successful strategies and practices relating to reasonable accommodations include the following:

1. Developing, implementing, and communicating the written procedures for processing requests for reasonable accommodations.
2. Establishing an administrative mechanism for minimizing the cost of an accommodation being assigned to a line manager’s budget, such as centralized funding source (sometimes referred to as a “centralized accommodation fund”).
3. Establishing an administrative mechanism or centralized source of expertise (appointing a specific individual and/or establishing an office) for assessing, evaluating, and providing reasonable accommodations (including assistive technology) to ensure the effectiveness and efficiency of the reasonable accommodation process.
4. Providing training for executives, managers, and line staff about new strategies and devices, such as telework and assistive technologies.
5. Ensuring that both managers and employees are aware that they may contact JAN to receive confidential and free advice and technical assistance on workplace accommodations.
6. Creating an online system for tracking accommodations in order to document their successful use.
7. Allowing line managers to authorize reasonable accommodations, with team review of denials and a requirement that all denials be signed by upper level management.
8. Assigning a full-time director of disability services or workplace supports to coordinate accommodations strategies.

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## **BUILD THE PIPELINE: OUTREACH AND RECRUITMENT**

“Where can I find qualified applicants with disabilities?” Companies have expressed concern that one of the greatest barriers they face regarding the hiring of individuals with disabilities, including veterans with disabilities, is the inability to find qualified candidates. The adoption of effective outreach and recruitment strategies is essential to ensuring that your workforce includes qualified individuals with disabilities.

To effectively build a pipeline of qualified applicants with disabilities, your company will need to develop relationships with a variety of recruitment sources. Such relationships can be formed through formal partnerships (e.g., where agreements are signed that formalize expectations from both parties) or informal interactions (e.g., meetings, exchange of contact information and staffing needs, and ongoing contacts regarding job openings and candidates). The investment will be well worth the effort; your company will not only secure access to talent that it otherwise may have overlooked, but also benefit from other supports that can assist in effectively integrating job candidates with disabilities into your workforce. Some recruitment sources to consider are listed below.

### **Recruitment Sources**

1. Public recruiting sources, including One-Stop Career Centers established under the Workforce Investment Act, State vocational rehabilitation agencies and community rehabilitation programs, State employment agencies, Employment Networks established under the Ticket to Work program, independent living centers established under Title VII of the Rehabilitation Act of 1973, as amended, and Department of Veterans Affairs Regional Offices.
2. Educational institutions, including community colleges, universities, and other institutions of learning and/or training, including those that offer programs for individuals with specific disabilities, such as persons who are blind, deaf, and have learning disabilities. Most college campuses have designated offices for students with disabilities, and these should be contacted for recruitment purposes in addition to career services.

In addition, there are several internship and recruitment programs designed exclusively for students with disabilities, including the Workforce Recruitment Program for College Students with Disabilities (WRP), Career Opportunities for Students with Disabilities (COSD) Career Gateway, Emerging Leaders, and Project SEARCH.

3. Non-profit entities and social service agencies, including labor organizations, organizations of and for individuals with disabilities, and other such entities that may provide referrals, technical assistance, and other advice on proper placement, recruitment, and accommodations.



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4. Private recruiting sources, including professional organizations, consulting services, and companies with expertise in disability.

### **Recruiting Strategies**

Strategies and steps that may be taken to attract and recruit qualified individuals with disabilities include the following:

1. Holding formal and informal briefing sessions, preferably on company premises, with representatives from recruiting sources. Integral components of briefings include company tours; explanations of current and future job openings and position descriptions; explanations of the company's selection process; recruiting literature; and a description of opportunities for formalizing arrangements for referrals of applicants.
2. Establishing formal arrangements for referral of applicants with representatives from recruitment sources, following up with sources, and providing feedback on which applicants were interviewed and hired.
3. Adopting a training program (and delivering it to company employees responsible for recruitment) on how and why to hire individuals with disabilities.
4. Using accessible online applications and recruitment and social networking sites so that job seekers with disabilities can learn about the company and its hiring initiatives. Such sites can also be used to generate leads with disability-focused organizations nationally and within the geographical area from which the company usually recruits.
5. Joining employer networking groups, such as the US Business Leadership Network or one or more of its local affiliates, that recognize and promote best practices in hiring, retention, and promoting individuals with disabilities.
6. Posting job announcements on accessible web-based "job boards" that specialize in identifying qualified individuals with disabilities (including veterans with disabilities), in disability-related publications, and with specific disability service organizations.
7. Participating in career fairs targeting individuals with disabilities, including veterans with disabilities.

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8. Engaging current employees or an employee resource group (ERG) as referral sources and asking if they know individuals with disabilities who would make good job candidates.
  9. Including people with disabilities on company recruitment teams.
  10. Building a talent pipeline for youth and young adults with disabilities (transitioning high school students and college students) through mentoring, internships and work experience programs, summer programs, career days, mock interviews and resume writing, youth motivational programs, and job shadowing activities.
  11. Attracting qualified individuals with disabilities not currently in the workforce who have requisite skills, including individuals located through local chapters of organizations of and for individuals with disabilities.
  12. Requesting that students with disabilities participate in campus recruitment events.
  13. Developing specific and targeted strategies for recruiting, hiring, and integrating veterans with disabilities, including wounded returning service members, and implementing internal training on these strategies.
  14. Designating a coordinator responsible for targeted outreach programs, including websites, schools, and employment assistance programs serving persons with disabilities.

### **Assessing Success**

The following strategies and practices have proven helpful in assessing the success of outreach and recruitment efforts:

1. Reviewing the outreach and recruitment efforts the company has taken over the previous year to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities.
2. Documenting each evaluation, including the criteria used, and the company's conclusions as to whether each effort was effective.
3. Identifying and implementing alternative strategies, if the company concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities.

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## **COMMUNICATE: EXTERNAL AND INTERNAL COMMUNICATION OF COMPANY POLICIES AND PRACTICES**

### **External Communications**

To maximize a company's ability to attract qualified individuals with disabilities, it is important to communicate its commitment to employing individuals with disabilities and an inclusive and diverse work environment to the public, including subcontractors and vendors. Examples of successful external communication strategies and practices include:

1. Including individuals with visible disabilities when employees are pictured in consumer, promotional, or "help wanted" advertising.
2. Sponsoring and participating in job fairs that target job seekers with disabilities.
3. Informing disability organizations about career days, youth motivation/mentoring programs, and related community activities sponsored by the company.
4. Sending information about relevant company policies and priorities to subcontractors, vendors, and suppliers and requesting their support, and, when feasible, requiring it contractually.
5. Communicating with union officials and/or employee representatives to inform them of the company's policies and seek their cooperation, if the company is a party to a collective bargaining agreement.
6. Posting the company's policy statements regarding inclusion and reasonable accommodations, special recruitment and hiring initiatives, and targeted internship, mentoring, and shadowing programs on its public website.

### **Internal Communications**

Strong external communication strategies and outreach and recruitment initiatives will be more effective if they are accompanied by internal support from supervisory and management personnel and are understood by co-workers, some of whom may have had only limited contact with individuals with disabilities. Internal communication and other strategies targeting managers, supervisors, and co-workers can foster awareness, acceptance, and support among all levels of staff within the company. Examples of successful internal communication strategies and practices include the following:

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1. Establishing a disability employee resource group (ERG) aligned with the company's diversity program and composed of existing employees with disabilities and employees with family members or friends with disabilities. The purpose of this group should include helping to identify policies and procedures that support a positive work environment for persons with disabilities.
  2. Publicizing the company's commitment in its internal publications (e.g., intranet, employee newsletters/magazines).
  3. Conducting special meetings, orientations, and training programs with executives, management, supervisory personnel, union officials, and employee representatives to communicate the commitment of the company and its leadership to fostering an inclusive corporate culture and work environment.
  4. Including images of employees with disabilities in employee handbooks and other internal publications that feature photographs of employees.
  5. Ensuring that people with disabilities are among those represented in the company's decision-making bodies, including the board of directors.
  6. Establishing a policy that all managers and supervisors share responsibility for the successful implementation of the company's inclusion policy and ensuring that they are held accountable through their performance evaluation plans.
  7. As part of the company's employee assistance program (EAP), adopting disability management and prevention programs, with the goal that workers who become injured on the job remain part of the workforce.
  8. Adopting a recognition and awards program acknowledging individuals responsible for achieving progress and positive outcomes related to disability employment.
  9. Including disability-friendly policies regarding internal communications and information dissemination in the employer's policy manual and employee handbook.

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## **BE TECH SAVVY: ACCESSIBLE INFORMATION AND COMMUNICATION TECHNOLOGY**

The development, procurement, lease, maintenance, and use of information and communication technology (ICT) are central to the operation of 21st century businesses. The Internet has dramatically changed the way that businesses conduct work and communicate with the public, including the manner in which individuals apply for jobs. Further, business use of the Internet, e-mail, and social media is dramatically changing the way companies communicate, both internally and externally.

To fully participate in the workforce, applicants and employees with disabilities must have access to and use of information and data that is comparable to the access and use by applicants and employees without disabilities. For example, if an online application system is not accessible to and usable by individuals with disabilities, applicants with disabilities will never “get through the front door” of applying for a job. Once an individual with a disability is on board, if they are not provided with accessible ICT and training, they are limited in their ability to develop skills needed to be productive team members and advance in employment. A commitment to accessible and usable ICT is as essential to facilitating meaningful and effective employment opportunities for individuals with disabilities as structural elements are to ensuring their physical access to buildings and offices.

Promising business practices regarding accessible ICT include the development of comprehensive strategic action plans that include the following:

### **Leadership and Team Approach**

1. Securing leadership at the highest levels of the company, in order to facilitate “buy-in” and establish and sustain corporate commitment to accessible ICT.
2. Establishing a network of individuals responsible for implementation (e.g., an accessibility team composed of managers across divisions, including human resources, information and communication technology, procurement, education and training, financial and marketing, and Americans with Disabilities Act (ADA) compliance).
3. Making the business case for ensuring that technology used by the business is accessible to the largest possible number of applicants, employees, and customers.

### **Needs Assessments and Priorities**

1. Considering all of the ICT used or offered and making a list of those platforms, devices, and applications.
2. Evaluating accessibility by testing ICT applications with automated accessibility testing tools and by considering the user experience of applicants, employees, and customers.

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3. Establishing a process and adopting criteria that can be used for setting priorities.

### **Formal Policies, Practices, and Procedures**

1. Adopting specific technical ICT accessibility standards and functional performance criteria regarding software applications and operating systems; web-based intranet and Internet applications; telecommunication products; video and multimedia products; self-contained closed products (e.g., copiers and printers); and computers.
2. Adopting accessible online application systems that include website integration; job posting and distribution tools; application and resume submission; communication between applicants and employer; resume extraction and management; candidate search and selection processes; and communication regarding a job offer or rejection.

### **Corporate-Wide Infrastructure**

1. Providing outsourcing guidelines to suppliers and business partners, including copies of the ICT accessibility guidelines, and ensuring that contracts stipulate suppliers will, where relevant, apply ICT accessibility standards.
2. Establishing clear procurement policies, including a solicitation policy that states ICT should be accessible, indicates which accessibility standards apply, and provides for inspection and acceptance of deliverables based on those standards.
3. Delineating the respective roles and responsibilities of key personnel, including the chief acquisition officer, chief information officer, and chief accessibility technology officer.
4. Conducting training for in-house staff, including program managers, contracting and procurement officers, software developers, web developers, and video and multimedia developers, including IT help desk staff.
5. Deploying accessible ICT throughout the company by, for example, establishing a mechanism for centralized expertise and/or funding.

### **Evaluation and Accountability**

1. Appointing a Chief Accessibility Technology Officer.
2. Notifying managers and employees about the company's ICT accessibility policy.

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3. Involving individuals with disabilities and experts in the development, implementation, and evaluation of policy.
  4. Establishing measurable objectives and benchmarks, including checklists, scorecards, and grid-based tracking documents.
  5. Designing and implementing data collection and continuous improvement strategies, including tracking and reporting systems and regularly scheduled reporting.

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## **GROW SUCCESS: ACCOUNTABILITY AND CONTINUOUS IMPROVEMENT SYSTEMS**

While the adoption of written policies, practices, and procedures is necessary to enhance employment opportunities for qualified individuals with disabilities, the ultimate objective is ensuring their implementation. Best business practices include putting systems in place to ensure accountability and continuous improvement relating to training; establishing accountability measures; establishing accountability and continuous improvement mechanisms; and designating responsible individuals.

### **Training**

Often times, “people don’t know what they don’t know.” It is critical that companies extend professional development opportunities to employees in all offices, divisions, and departments. Specific examples of strategies and practices regarding training that have proven successful include:

1. Providing training on disability-related issues to all personnel, particularly those involved in the recruitment, hiring, promotion, and retention processes (e.g., understanding legal requirements, disability etiquette and disability awareness, retention and return-to-work strategies, overcoming stereotypes and other attitudinal barriers, reasonable accommodation procedures, and targeted hiring programs).
2. Incorporating training on disability-related issues as a regular and ongoing component of the company’s diversity initiatives.

### **Establishing Accountability Measures**

It has been stated that “what gets measured gets done.” Specific strategies and practices that your company can use to measure its progress toward creating an inclusive workplace include establishing annual quantitative goals, objectives, and benchmarks related to the following:

1. Outreach to and recruitment (including referrals) of people with disabilities
2. Hiring, retention, and advancement of people with disabilities; and
3. Sponsored educational, training, recreational, and social activities that are inclusive of and/or focused on disability issues.

### **Establishing Accountability and Continuous Improvement Mechanisms**

Accountability and continuous improvement mechanisms are necessary to ascertain whether current policies, practices, and procedures are effective and whether the company is making progress in



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improving employment opportunities for persons with disabilities. Examples of strategies and practices regarding accountability and continuous improvement mechanisms that have proven successful include the following:

1. Reviewing annually all employment-related activities, including:
  - Job posting, recruitment, advertising, and job application procedures, including testing;
  - Hiring, promotion, upgrading, awards of tenure, and layoffs;
  - Rates of pay and any other forms of compensation, including fringe benefits;
  - Job assignments, job classifications, job descriptions, and seniority lists;
  - Sick leave, leaves of absence, and other leave;
  - Training, apprenticeships, attendance at professional meetings and conferences; and
  - Any other terms, conditions, and privileges of employment.
2. Conducting annual self-assessments, including identifying trends and/or issues needing more attention such as:
  - Tracking information related to the provision of reasonable accommodations that could be used to assess the effectiveness of accommodations and the process;
  - Tracking data relating to the representation of individuals with disabilities in the workforce to ascertain trends, including the efficacy of recruitment, hiring, retention, and promotion initiatives; and
  - Establishing a complaint tracking and monitoring system to identify areas needing systemic improvements.
3. Seeking input from employees with disabilities regarding implementation of policies and strategic plans using employee surveys, focus groups, and discussions with employee resource and advisory groups.
4. Based on these reviews and assessments, developing strategic plans that include proactive steps and the implementation of specific actions necessary to address any noted deficiencies.
5. Providing regularly scheduled reports to company leaders and/or other high-ranking managers regarding implementation of the company's strategic plans, including completion dates and managers who are accountable and responsible for various action items.

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## **Designating Responsible Individuals**

Designation of authority and responsibility is of central importance to enhancing and securing implementation of disability employment policies and practices. Specific examples of strategies and practices that have proven successful include:

1. Assigning and defining the scope of responsibility for implementation to specific individuals.
2. Identifying the responsible individual(s) in internal and external communications.
3. Providing top management support (including budgets) and, if appropriate, staff to manage implementation.
4. Explaining to managers and supervisors how performance elements included in their performance plans related to the recruitment, hiring, advancement, and retention of persons with disabilities will be assessed.