Leveling the Playing Field

ATTRACTING, ENGAGING, AND
ADVANCING PEOPLE WITH DISABILITIES

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Attracting, Engaging, and Advancing People with Disabilities

RESEARCH REPORT R-1510-12-RR

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Key Findings

People with disabilities experience significant challenges in finding employment. The participation of people with disabilities in the workforce and their median income are both less than half that of the civilian workforce. They work part time 68 percent more frequently than people without disabilities. These disheartening results persist despite the enactment of significant federal legislation aimed at making the workplace more supportive and accessible to people with disabilities.

The Conference Board Research Working Group (RWG) on Improving Employment Outcomes for People with Disabilities was convened to address how to overcome these disparities. It was sponsored by the Employment and Disability Institute at Cornell University, under a grant from the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education. The RWG members focused on four questions:

1 **The business case** Is it advantageous for organizations to employ people with disabilities?

2 **Organizational readiness** What should organizations do to create a workplace that enables people with disabilities to thrive and advance?

3 **Measurement** How can success for both people with disabilities and the organization itself be determined?

4 **Self-disclosure** How can people with disabilities, especially those whose disabilities are not obvious, be encouraged to identify themselves so that resources can be directed toward them and outcomes can be measured?

One challenge the RWG faced in answering these questions was defining disability. In the past, disability has been defined as an individual problem. The focus of this definition was on intervention with the person with a disability. More recently, disability has come to be viewed in its full complexity as an interaction between a health condition—including vision impairments, missing limbs, and other issues—environmental factors, individual and social attitudes, and the individual circumstances of the person with a disability.

The latter definition, which more broadly encompasses such factors as social and organizational change, training, improvements to the workplace, and public policy, has come to be seen as more effective. Based on this broader definition of disability, the United States Census Bureau American Community Survey uses six yes/no questions for self-identification of a person with a disability.[1] These questions can be adapted for use on employee surveys.

The Business Case for Employing People with Disabilities

The business case for people with disabilities presented in this report is viewed through seven lenses:

1 Talent pool
2 Costs
3 Benefits
4 Revenue and market share
5 Work group performance
6 Financial incentives
7 Fulfillment of executive and legislative mandates

Through six of those lenses, people with disabilities are equivalent or, in some respects, superior to their peers without disabilities. Through the cost lens, people with disabilities appear to be more costly employees than people without disabilities, but only marginally so. Although more definitive research is needed, the conclusion based on available data is clear: people with disabilities are a solid business investment.

Organizational Readiness, Measurement, and Self-Disclosure

The eight leading practices discussed below represent the "best of the best practices" for improving employment outcomes for people with disabilities.

1 **Develop leadership commitment** True leadership commitment requires leaders to establish the employment of people with disabilities as a clear priority, mobilize middle management, build a business case that resonates truth for the organization, place people with disabilities in leadership positions, aggressively communicate their commitment and actions inside and outside of their organizations, and, ideally, find their passion. Effective top leaders go well beyond winning external recognition and awards.

2 **Assign responsibility** Put someone in charge of attracting, engaging, and advancing people with disabilities and ensure that person has the support and resources he or she needs to be successful. Hold that person accountable for achieving objectives.

3 **Find a partner** To identify qualified employees with disabilities, find a partner in the placement business. State vocational rehabilitation agencies are a great place to start. Consider the character of the candidate along with their competence in hiring decisions.

4 **Establish employee resource groups** Open employee resource group (ERG) membership to caregivers and allies. Identify a top executive with a passion for advancing people with disabilities or who is a passionate caregiver to chair or sponsor the group. Tightly define the purpose. Institute an ongoing state-of-the-company focus group composed of a cross-section of ERG members to bring the voice of the grassroots to the top. Create internal partnerships with business units and functions that target and realize revenues (or could) from customers with disabilities and their caregivers. Conduct workplace, product, and customer accessibility assessments. Get involved in recruiting. Foster career and leadership development.

5 **Make managers accountable** Incorporate goals for attracting, engaging, and advancing people with disabilities into every managers' and supervisors' performance plan. Then, support and manage them relentlessly to ensure they achieve their goals.

6 **Measure for understanding and results** Include measures of people with disabilities and caregivers in the employee survey. Measure for results to determine strategic focus and results to define real, unvarnished outcomes. Design the survey to measure both performance and importance and then target high leverage areas that are high on importance and low on performance. Link the survey to a measure of employee engagement.

7 **Make it safe to self-identify** Many people with disabilities are unidentified and most acquire their disability after being hired. Develop an organizational climate that makes it safe to disclose and provide solid reasons to disclose, such as flexible work options and access to accommodations, facilities, and technology.

8 **Raise understanding and skill levels** Train all employees on etiquette and understanding. Drive out the fear of interacting with people with disabilities. Ensure managers are aware of their role in leveling the playing field, especially their role in eliminating unintended biases and micro-inequities; know how to interview objectively, how to be inclusive in word and deed, and what their role is in the accommodations process; and fully understand their accountabilities and legal responsibilities.

The Global Landscape

Improving the employment outcomes of people with disabilities is a global issue. The RWG identified two global issues of particular interest to employers: adherence to the United Nations (UN) Convention on the Rights of Persons with Disabilities (the Convention) and employment quotas and levies. The purpose of the Convention is to "promote, protect, and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity."[2]

While the United States has not ratified the Convention, 110 countries in which global employers are likely to do business have.

Some RWG members noted that their organizations or organizations with which they were familiar were paying fines in some countries for not meeting quotas for employing people with disabilities. Many countries establish quotas for the number of people with disabilities employers must hire, and many uses are made of these levies, including use by public agencies to improve employment outcomes for people with disabilities and subsidies to employers who do meet the quotas.

The Future of Employment of People with Disabilities

Although current results for employing people with disabilities have not been stellar, three trends will affect the future employment of people with disabilities:

1 Because the occurrence of disability increases with age, the proportion of the talent pool with disabilities will grow as the U.S. population ages. In addition, technological innovations that widen access to the workplace and health care advances that extend and improve life will also increase the proportion of the talent pool composed of people with disabilities.

2 Existing incentives and proposed quotas—especially for those doing business with the U.S. government and foreign governments—that establish quotas and levy fines will increase the motivation to hire people with disabilities.

3 Changing attitudes toward remote work and the increasing availability of technologies that enable remote work, increase access to information and communication technologies, and offer wider application of universal design will further improve access.

Conclusion

Fostering the employment of people with disabilities benefits all employees and, ultimately, the organization itself. Universal design facilitates the flexibility and agility required by the global workplace. Basing employment decisions on performance and merit makes employers more competitive. The flexibility required to attract, engage, and retain people with disabilities helps attract and retain the educated workers demanded by the growing number of knowledge-based enterprises. For the most part, programs that benefit people with disabilities benefit all employees and, therefore, employers.

Introduction

People with disabilities are on the very low end of a profoundly tilted employment playing field. In the United States in 2009, the participation rate of working-age people 21–64 with disabilities—the proportion who were employed or actively seeking employment—was 36 percent, compared with 76.8 percent for people with no disability. The median annual income was $37,200 for households that include working-age people with disabilities, compared to $60,000 for households that did not include any working-age people with disabilities. Just over 26 percent of people with disabilities fell under the poverty line, compared with nearly 11 percent of those with no disability.[3] People with disabilities worked part time 68 percent more often than people with no disabilities.[4]

The Conference Board Research Working Group (RWG) on Improving Employment Outcomes for People with Disabilities was established to address these disparities by identifying leading practice strategies and methods for overcoming workplace discrimination. The RWG also sought to determine how to create work environments that foster the attraction, engagement, and advancement of people with disabilities while boosting business and organizational outcomes.

The RWG's member organizations brought a wide range of employment challenges and information needs to the table. To ensure an achievable agenda, the RWG focused on concerns related to four critical questions:

1   **The business case** Is it advantageous for organizations to employ people with disabilities?

2   **Organizational readiness** What should organizations do to create a workplace that helps people with disabilities thrive and advance?

3   **Measurement** How can success for both people with disabilities and the organization itself be determined?

4   **Self-disclosure** How can people with disabilities, especially those whose disabilities are not obvious, be encouraged to identify themselves so that resources can be directed toward them and outcomes can be measured?

This report examines each of the four topics in depth, as well as the global landscape and what the future holds for the employment of people with disabilities. While the business case is treated on its own, the topics of measurement and self-disclosure are treated within organizational readiness because they are closely related to one another (you can't measure what you don't know). Of course, self-disclosure is also the door to reasonable accommodations and financial incentives.

About the Research Working Group

The Research Working Group on Improving Employment Outcomes for People with Disabilities held its first meeting in New York in June 2011, which was followed by meetings in September at Lockheed Martin in Bethesda, Maryland, and December at Mattel in Los Angeles. Between meetings, members participated in numerous subgroup meetings and webinars, gathered and reviewed research, and conducted a short survey of employers. Members worked in a confidential, "hands-on" environment to encourage the frank exchange of ideas as they reviewed data, analysis, research, and their own practices.

Preparation of this research report was supported by the National Institute on Disability and Rehabilitation Research of the U.S. Department of Education through its Rehabilitation Research and Training Center grant to Cornell University (No. H133B100017). The contents of this report do not necessarily represent the policy of the Department of Education or any other federal agency, and readers should not assume endorsement by the federal government (Edgar, 75.620(b)). The authors are solely responsible for the views expressed. Additional support came from members of the working group.

The research working group included 16 member organizations: Alcoa; Bayer; CVS Caremark; U.S. Department of Veterans Affairs, Vocational Rehabilitation and Employment Service; Discovery Communications; Fidelity Investments; Goldman Sachs; KPMG LLP; Lockheed Martin; Mattel; New York Life Insurance; U.S. Department of Treasury, Comptroller of Currency; Pennsylvania Department of Labor and Industry; U.S. Department of Defense; U.S. Department of the Army; and Waste Management.

The purpose of this report is to raise awareness about people with disabilities among top diversity and human resources leaders and serve as a resource for those interested in the creation of strategies and initiatives to help companies successfully employ people with disabilities. Although the report is intended to be detailed and comprehensive, readers do not need to consider it a rulebook or a formula for success that must be followed to the letter. It is more a guide to a number of successful strategies and initiatives that employers can consider when establishing short- and long-term priorities based on the goals and needs of their organizations.

Two features of the report are intended to help readers assess and then pick approaches when they are establishing their priorities. Throughout the report, "Leading Practices"—those activities that tend to have high organizational benefit—are offered. One size, however, does not fit all. Readers should be careful to ensure that these critical practices are relevant to the needs and direction of their unique organizations. In addition, a planning matrix (Table 6 on page 45) and guidance for completing it (see Table 7 on page 46) are offered in this report. The planning matrix guides the formulation of a multi-year change strategy for employing people with disabilities.

This report has also been designed to allow the user to focus on those sections that are most relevant to receive a full understanding and access best practices for the topic selected. Some best practices fit more than one topic (e.g., top management commitment, communications, and measurement). As a result, the person who reads the entire report or significant parts of it will notice minor redundancies.

One challenge of a report on attracting, engaging, and advancing one subgroup of employees is that recommendations for that subgroup can be applicable to all employees, leading to "truisms." For example, one major insight from this publication is that people with disabilities are a bellwether for all employees, and, in general, what is good for employees with disabilities is good for all employees. Despite their widespread applicability, the report would be remiss if it left out these "truisms."
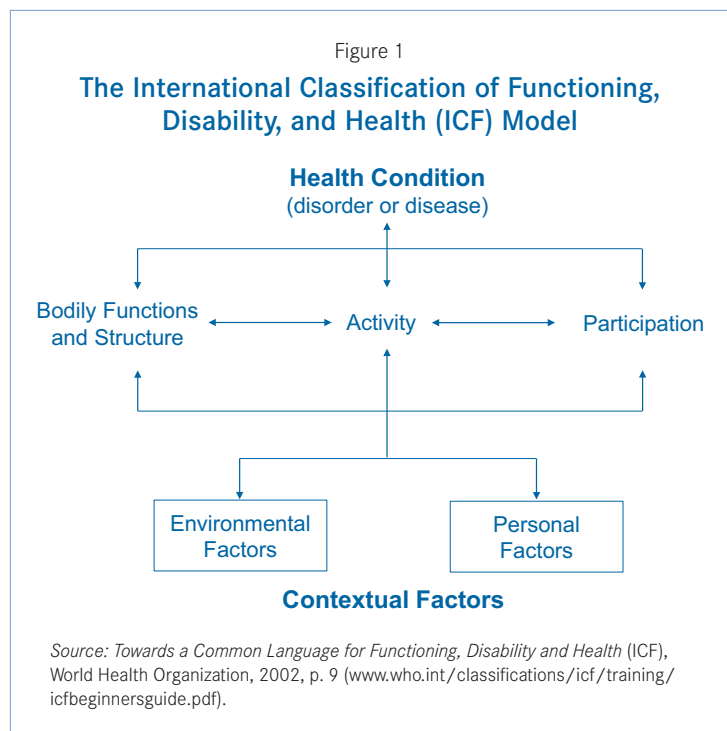
In answering the four questions posed by the RWG, two of the most important sources were the Americans with Disabilities Act (ADA) of 1990, as amended in 2008, and the Rehabilitation Act of 1973, as amended. Before taking any action on the basis of these or any other laws mentioned in this report, readers should always consult their own legal counsel to ensure their actions are consistent with how their organizations interpret these legal mandates.

Before delving into the four questions above, it is essential to define disability. This is no simple task. Just for "the analyses that are conducted in computing government support programs" for people with disabilities, "more than 30 definitions of disability have been documented."[5]

Defining Disability

Traditionally, disability in the workplace has been viewed as a health condition—a disease, disorder, or injury—with little consideration for its impact on the workplace or the personal, organizational, and social contexts in which it exists. In this view, people with disabilities must be healed, rehabilitated, or augmented in some way to make them employable. More recently, disability has come to be viewed in its full complexity as an interaction between a health condition, environmental factors (e.g., the physical environment and attitudes), and personal factors (e.g., gender and age). The model adopted by the World Health Organization in its International Classification of Functioning, Disability, and Health (ICF) (Figure 1) defines disability at three levels:[6]

- **Impairment** Problems in a body structure, such as structures related to movement, and functioning of the body or body part, such as neuromuscular or skin functions.

- **Activity limitations** These limitations are defined as "difficulties an individual may have in executing activities."

- **Participation restrictions** Such restrictions include "problems an individual may experience in involvement in life situations."

Figure 1

The International Classification of Functioning, Disability, and Health (ICF) Model

Source: *Towards a Common Language for Functioning, Disability and Health* (ICF), World Health Organization, 2002, p. 9 (www.who.int/classifications/icf/training/icfbeginnersguide.pdf).

This more systemic view goes beyond a focus on the individual to address organizational and broader social issues through learning and development activities, changes to the work environment, self-advocacy, and public policy. This model was the basis for the six questions the U.S. Census Bureau uses to define disability in its surveys, which are discussed in the "Self-Disclosure" section of the report.[7]

The ICF was officially endorsed by all the member states that participated in the 54th World Health Assembly of the World Health Organization (WHO): "By shifting the focus from cause to impact it places all health conditions on an equal footing, allowing them to be compared using a common metric."[8]

In the Unites States, the ADA definition is important for organizations, since most are governed by it. For the purposes of the ADA, as amended in 2008, the term "disability" means:[9]

1 A physical or mental impairment that substantially limits one or more major life activities

2 A record of such an impairment

3 Being regarded as having such an impairment

According to the ADA, impairments include but are not limited to the following:[10]

- Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic (blood), lymphatic, skin, and endocrine.

- Any mental or psychological disorder, such as an intellectual disability (formerly termed "mental retardation"), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

The determination of whether an impairment "substantially limits" a major life activity under the ADA starts with an individual assessment, which compares the individual to "most people in the general population." Important factors in making this determination are the length and severity of the disability.

The ADA regulations suggest that the following impairments are likely to "substantially limit" a major life activity, although they are still subject to assessment:

- deafness
- blindness
- an intellectual disability
- partially or completely missing limbs or mobility impairments requiring the use of a wheelchair
- autism
- cancer
- cerebral palsy
- diabetes
- epilepsy
- HIV infection
- multiple sclerosis
- muscular dystrophy
- major depressive disorder
- bipolar disorder
- post-traumatic stress disorder
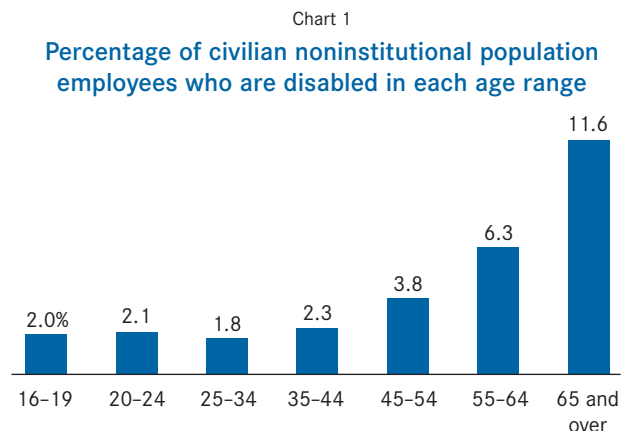- obsessive compulsive disorder
- schizophrenia

Major life activities include, but are not limited to:

- caring for oneself
- performing manual tasks
- seeing
- hearing
- eating
- sleeping
- walking
- standing
- sitting
- reaching
- lifting
- bending
- speaking
- breathing
- learning
- reading
- concentrating
- thinking
- communicating
- interacting with others
- working and the operation of a major bodily function, including:
  - functions of the immune system, special sense organs and skin
  - normal cell growth
  - digestive, genito-urinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic (blood), lymphatic, musculoskeletal, and reproductive functions

The operation of a major bodily function includes the operation of an individual organ within a body system.[11]

According to a Sun Life Financial analysis of group long-term disability actuarial tables from the Society of Actuaries, 20 percent of workers will suffer a disability lasting one or more years during their professional lives.[12] The rate of disability in the U.S. population also accelerates substantially when employees pass their mid-forties (Chart 1). People with disabilities, however, represent only 3.3 percent of the U.S. workforce.[13]

Chart 1

Percentage of civilian noninstitutional population employees who are disabled in each age range

Source: Table 1, "Employment status of the civilian noninstitutional population by disability status and selected characteristics, 2010 annual averages," in Bureau of Labor Statistics, U.S. Department of Labor, "Persons with a Disability: Labor Force Characteristics – 2010," press release, June 24, 2011.

The Business Case

To construct the business case, the RWG took an objective, fact-based approach. While extensive data are available, many of them are unsubstantiated and unsourced. For example, in making the case that people with disabilities are an important consumer market, it is often said that the aggregate income of people with disabilities is over $1 trillion, an observation that can be traced back to a 1998 article in *Fortune* magazine.[14] No source was given for this number in the article, and further analysis by the Employment and Disabilities Institute at the ILR School of Cornell University suggested that it was high.

Studies that follow carefully constructed sampling procedures or use population-based estimates, such as those from the Census Bureau and the Bureau of Labor Statistics, best represent the population under discussion. However, because of the sparseness of data on particular topics, the RWG relied on focus groups, polls, surveys, and other data that were grounded in smaller samples and studies that contained samples of only select employees or surveys conducted for single employers. These may not be entirely representative of the population of people with disabilities.

To ensure the objectivity of the data, two standards were set. The first was that the source of the data had to be verifiable and reliable (i.e., the original source of the data must be known and that source must have a reputation for integrity). Second, in cases where competing data existed, the most conservative assumption, the one that most understated the business case, was selected. For example, estimates of the size of the population of people with disabilities range from 10.4 percent of the total population to well over 20 percent.[15] In all calculations made by the researchers that required a population estimate, the 10.4 percent figure was used.

Another challenge in constructing the business case for employing people with disabilities is that people with disabilities vary widely. The population includes people with hearing impairments, learning disabilities, traumatic brain injuries, intellectual disabilities, diabetes, and levels of disability from mild to profound. The data needed to construct a business case for every subgroup simply do not exist, and, for the purposes of this section, all people with disabilities are treated as a homogeneous group.

In one case—the issue of whether adding people with disabilities to a work team improves problem solving, decision making, innovation, or productivity—the RWG could find little data specifically on people with disabilities that met its standards. In that case, the general literature on diversity in work teams was used.

The RWG reviewed the research for seven business case categories to determine the degree to which the business case was supported in each category.

1. The Talent Pool

If people with disabilities compose at least 10.4 percent of the U.S. population, it is clear that aggressive outreach to people with disabilities will significantly expand the talent pool. While, as noted above, the population of people with disabilities is less educated than the rest of the population, 8.3 percent of people with disabilities who are unemployed (i.e., those who are jobless and actively seeking work) have a bachelor's degree or higher, compared to 4.5 percent of those with no disability who are unemployed.[16] For veterans with disabilities, the picture is particularly strong. Of active duty enlisted members, 98.6 percent have at least a high school diploma, compared with 86.6 percent of the civilian population 25 and over; 86.5 percent of active duty officers have a bachelor's or advanced degree, compared with 29.4 percent of the U.S. population age 25 and over.[17]

2. Costs

Even though the talent pool of people with disabilities is large, fears and questions about the costs of employing people with disabilities persist. Are workers' compensation and health care costs higher? Does the requirement for providing reasonable accommodations lead to added expenses? If an organization hires people with disabilities, is it more likely to be charged with employment-related discrimination? Do people with disabilities have higher turnover rates? There are also questions about the performance of employees with disabilities: Will they require more supervision time? Do they take more sick days or have higher absenteeism rates? Will they get to work on time? Do they have more accidents? Will they be as productive? Will they be effective with customers?

Workers' compensation costs

A number of studies offer evidence that the presence of a health condition or mental health or physical functioning disorder does not necessarily result in individuals with these issues filing workers' compensation claims with any more frequency than their counterparts without such issues.[18] For example, in a study of nearly 1,600 people diagnosed with work-related neck, upper extremity, and lower back musculoskeletal disease, only 25 percent filed workers' compensation claims.[19]

Health care costs

Health care costs are complicated to assess on a national basis. Under the provisions of the ADA and Equal Employment Opportunity Commission (EEOC) guidance, "[e]mployers may not fire or refuse to hire a qualified applicant who has a disability, or who has a dependent with a disability, in order to avoid potential increases in health insurance costs."[20] In effect, covered employers cannot use health care costs to make employment decisions, making the cost of health care a moot issue. Nevertheless, the annual health care expenditures of a person with disabilities in the U.S. population—working and not working—are approximately four times those of a person with no disabilities.[21] Of course, as noted above, people with disabilities are only 3.3 percent of the U.S. workforce and those with more severe disabilities, which require higher health care expenditures, are often not in the workforce at all. Several other factors mitigate the impact on employers of these disproportionate expenditures:

- A larger proportion of employees with disabilities work part time (32 percent, compared with 19 percent of the population without a disability),[22] and only 16 percent of part-time workers are offered health insurance by their employers, compared with 60 percent for full-time employees.[23]

- Most employers contribute less than 100 percent of health care costs. In 2011, on average, they contributed 82 percent of the cost for single workers and 72 percent for families.[24]

- For veterans, the Veterans Administration takes responsibility for health care related to a service-connected disability, while a private insurer is responsible for the rest.

- A significant proportion of people with disabilities become disabled after they reach retirement age (Chart 1, page 10).

Because of state-by-state variation and other variables, it is difficult to estimate the impact of employing people with disabilities on employers' health care costs. Given the mitigating factors above, it is reasonable to say that a substantial portion of the greater cost of health care for the entire population of people with disabilities is not passed on to employers.

Accommodation costs

The ADA requires covered organizations to provide "reasonable accommodations" for people with disabilities unless they represent an "undue hardship." Some employers are concerned that providing accommodations will be expensive, but the findings in two studies do not bear this out. According to respondents to a 2006 study, 49.4 percent of employers reported zero direct cost for the accommodations they implemented or were in the process of implementing in 2004 and 2005. The median cost of an accommodation in the first calendar year of the 2006 study was $600. When those that had zero cost are factored in, the median cost of a first year accommodation was $25.[25] In another study of 500 accommodations conducted for Sears, Roebuck & Co. between 1978 and 1997, the majority (72 percent) reported no direct costs. Of the remainder, 17 percent cost less than $100, 10 percent between $100 and $500, and only 1 percent cost more than $500. From 1978 to 1992, the year that the ADA was implemented, the average direct cost of an accommodation was $121. From 1993 to 1997, the average direct cost was $45.[26]

Another factor that may have some bearing is that people with disabilities self-accommodate. Prior to joining the workplace, they may have already purchased expensive items (e.g., hearing aids, vans, and power wheelchairs). People with disabilities also learn to self-accommodate while on the job. For example, people with finger dexterity impairments have been known to develop alternative ways of typing.

Legal and related costs

For the period between 1993 and 2007, considerably more employment-related charges per 10,000 people were brought under the ADA than the Age Discrimination in Employment Act (ADEA) or under Title VII of the Civil Rights Act for women and nonwhites (Chart 2). Over 60 percent of the charges were filed against smaller companies with fewer than 500 employees. The greatest number of disability-related charges were related to termination (62.7 percent), followed by reasonable accommodation (24.7 percent), terms and conditions of employment (18.8 percent), harassment (12.2 percent), and discipline (5.2 percent).[27]

In 2009, 21,451 charges were filed against employers under the ADA, of which 15 percent resulted in settlements that averaged $20,947. From 1993 to 2009, 874 charges ended up in EEOC lawsuits, averaging $99,123 in judgments.[28]

Given these substantial judgments, the very significant managerial and legal time needed to address charges and lawsuits, and the potential damages to an organization's reputation, is seeking out people with disabilities worth the risks? It is if organizations are willing to develop work environments, policies, and practices that welcome and support people with disabilities. Workplace culture has a substantial influence over whether or not charges are brought. As a 2010 article notes, "A perceived devaluing of employees can escalate feelings of alienation and detachment from the workplace, ultimately leading to charges of discrimination."[29] Conversely, according to a 2009 paper, "Workplace culture improves for everyone when managers engage in positive 'diversity behaviors,' such as acknowledging all team members, promoting cooperation, being flexible, and respecting everyone."[30]

Chart 2

Charges by statute per 10,000 people in labor force with protected class characteristics: 1993–2007
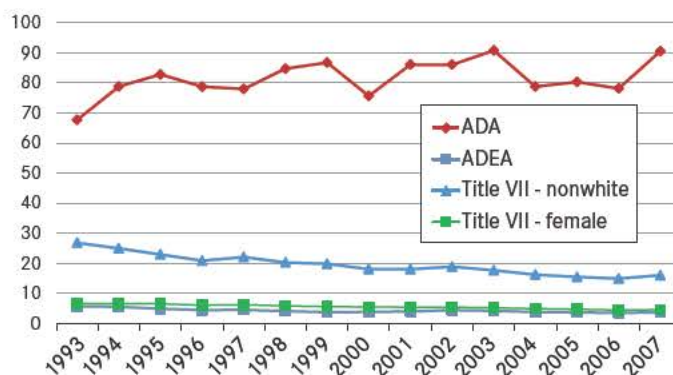
Source: Susanne M. Bruyere, Sarah von Schrader, Wendy Coduti, and Melissa Bjelland, "United States Employment Disability Discrimination Charges: Implications for Disability Management Practice," *International Journal of Disability Management*, 5, no. 2, 2011, pp. 48-58.

3. Benefits

The minor additional costs for workers' compensation and accommodations for people with disabilities, the rare but substantial costs of employment-related charges and lawsuits, and the likely additional costs for health care are at least partially offset by the benefits from making accommodations, especially reduced turnover. In a follow up survey of 1,182 employers who had contacted the Job Accommodation Network for assistance with accommodations, the employers reported a number of direct and indirect benefits of accommodations, including increased employee retention and productivity (Table 1).[31]

Table 1

Percentage of respondents citing the following as benefits resulting from making reasonable accommodations for employees with a disability

Direct benefits		Indirect benefits	
Company retained qualified employees	86%	Increased overall company morale	61%
Increased the employee's productivity	72	Increased overall company productivity	59
Eliminated costs associated with training new employees	55	Increased workplace safety	47
Saved workers' compensation or other insurance costs	47	Improved interactions with customers	37
Increased the employee's attendance	39	Increased overall company attendance	27
		Increased profitability	24

Source: Selected from Beth Loy and Linda Carter Batiste, "Universal Design and Assistive Technology as Workplace Accommodations: An Exploratory White Paper on Implementation and Outcomes" (Job Accommodation Network, Office of Disability Employment Policy, U.S. Department of Labor), May 2007, Table 4, p. 11. Over 1,000 employers were surveyed (1,182), of which 96 were "employers who incurred a cost purchasing or modifying a product" to accommodate an employee.

In a 2010 survey by the Kessler Foundation and the National Organization on Disability, 33 percent of HR managers and senior executives said that employees with disabilities had lower rates of turnover, while 7 percent said they had higher rates.[32] Another survey from 2007 found employees with disabilities stay on the job an average of 4.26 months longer than employees without disabilities.[33] The total cost of one turnover incident ranges from 93 to 200 percent of the employee's wage, depending on the employee's skill and level of job responsibility.[34] The net estimated economic benefit (benefits minus direct cost) in the first year of providing an accommodation was $11,335.[35] Such savings are, however, often "avoided costs" (i.e., money an organization did not have to spend to replace an employee) instead of actual costs, which can make the cost-saving argument more difficult to make, especially to line business and financial staff.

In a 2002 survey of supervisors with experience managing people with disabilities, respondents "indicated that the work performance of employees with disabilities was the same as or better than coworkers on almost all of the measures of work performance." [36] In particular, the 255 supervisors said that, on average, employees with disabilities performed better than their coworkers in terms of punctuality, attendance, work quality, task consistency, and overall proficiency. In a study from 2000, of the 248 managers with experience supervising a worker with a disability who were asked how likely they were to recommend hiring workers with disabilities, 100 percent answered "likely" to "very likely."[37]

Other employer-based surveys and available data on select employees indicate that four particular concerns about people with disabilities—they have more accidents, require more supervision, have more absences, or hurt business if they deal directly with customers—are relatively unfounded. In studies in 1981 and 1990, DuPont found that over 95 percent of workers with such disabilities as amputations, epilepsy, hearing disorders, mental impairments, substance addiction, vision impairments, and paralysis were rated "average" or "above average" on safety.[38] According to another study from 2007, which examined 314 employees (95 with disabilities and 219 without disabilities), people with disabilities require a relatively minor amount of additional supervision compared to people without disabilities.[39]

This study revealed that people with disabilities had 1.13 more unscheduled absences over the previous six months, but had 1.24 fewer scheduled absences.[40] In a 2005 survey of 803 adults who received services from people with disabilities, 98 percent were "satisfied" or "very satisfied" with the services they received.[41] Thirty-five percent of HR managers and senior executives in a 2010 study judged employees with disabilities "more dedicated," while only 2 percent judged them to be "less dedicated."[42]

4. Growth in Revenue and Market Share

People with disabilities, their caregivers, and their families represent substantial markets, both as consumers of assistive technologies and support services and of general consumer products and services. Although the true size of either market is difficult to determine, research reviewed by the RWG suggests that they are both substantial.

The market for assistive technologies and support services

Market research in this area includes both people with disabilities and older adults. However, the nature of the technologies and services is such that the older adults who use the services are most likely doing so because they have a disability. According to a study from December 2011, annual revenue for services, excluding medical services and overnight housing, is estimated to be $34 billion,[43] and another study from July 2011 anticipated that the U.S. market for assistive technologies, including eye glasses and contact lenses will reach $55 billion in 2016.[44] Based on estimates from the CIA's *World Factbook*, these two markets were greater in size in 2011 than the gross domestic products of 151 out of the world's 227 countries.[45]

The consumer market

People with disabilities earned an estimated $269 billion in 2009, and people with disabilities and their family members (i.e., those who live in the same household) represent a population of 54.7 million.[46] Eighty-seven percent of consumers who responded to a 2005 survey said they "agreed" or "strongly agreed" that they would prefer to give their business to companies that employ people with disabilities; 92 percent of respondents were "more favorable" or "much more favorable" toward companies that hire people with disabilities.[47]

While companies that advance and support people with disabilities should avoid letting their publicity get ahead of their accomplishments, they should not be shy about publicizing their commitment and accomplishments. For American consumers, this is important information that can have a strong influence on their buying decisions. Eighty percent of respondents to a 2008 survey said that, if the quality and price of two brands were equal, they would be likely to switch to a different brand if they knew that it supported a specific cause.[48]

5. Work Group Performance

Do work groups that include people with disabilities underperform, outperform, or perform equal to groups that do not contain people with disabilities? No substantive research that examines the relationship between having a disability and group or team performance was identified in the course of this investigation. This section looks at the relationship between diversity and group performance and then examines whether the aspects of diversity that enhance performance are true for people with disabilities.

The relationship between diversity and group performance has historically been a mixed bag, with some studies reporting higher group performance and others reporting lower.[49] A major factor in lower group performance is that demographic diversity has been shown to increase conflict, reduce cohesion, complicate internal communications, and hamper coordination within the team.[50] These negatives seem to decline over time as group members overcome differences and take advantage of diverse knowledge, values, and experience,[51] and they tend to be absent in groups with high levels of training in career development and diversity management.[52] The positive effects of diverse groups are not automatic and require time and effective management.

In a study from 2009, the positive effects of diversity on group performance were just as mixed. In a large scale analysis of 108 empirical studies, covering 10,632 teams, a significant positive relationship was found between cultural diversity and creativity, but the authors also found that cultural diversity led to process losses through task conflict and decreased social integration.[53] Despite the potential problems, Scott Page, using mathematical modeling to examine the impact of diversity on performance, found that "diversity trumps ability." The best problem solvers tend to be similar in approach, so that "a collection of the best problem solvers performs little better than any one of them individually." A group of intelligent, randomly selected problem solvers provides a wider range of approaches to

problem solving, generates more solutions, and offers more ways to back out of dead ends.[54]

The mechanism that gives diverse groups a performance advantage is that they tend to have more information, a richer range of perspectives and ways of representing problems, and a wider repertoire of problem-solving approaches.[55] Because people with disabilities have typically had to make more adaptations and accommodations to be successful in their work lives, they may well bring a wider range of perspectives and problem-solving repertoires.

6. Financial Incentives

There are a significant number of incentives—government programs and tax deductions and credits—to encourage and underwrite costs associated with hiring people with disabilities, but one 2003 study found that 77 percent of respondent companies did not take advantage of any of them.[56] There are a number of significant federal programs that directly benefit businesses. (For more information, see Appendix I, "Financial Incentives to Employers for Training, Hiring, and Being Accessible to People with Disabilities" on page 58 for detailed descriptions.)

The **Work Opportunity Tax Credit** provides tax credits for new hires from eight target groups that can typically be as much as $2,400 for each new adult hire and $1,200 for each summer youth hire.[57] For certain veterans' groups and long-term family assistance recipients, the maximum can be up to $9,600.[58] Legislative authority for WOTC target groups that do not include veterans expired on December 31, 2011, and although reauthorization is possible, it has not yet occurred.[59]

Vocational Rehabilitation and Employment (VR&E) Program is a program of the U.S. Department of Veterans Affairs that provides on the job training, incentives that can reimburse employers up to 50 percent of a veteran's salary for up to six months, and an unpaid work experience program in which the employer pays nothing and the VR&E provides a monthly subsistence allowance.

Disabled Access Credit, Internal Revenue Code Section 44 is a tax credit for expenditures on accessibility for eligible small businesses that spend at least $250 but do not exceed $10,250 in any one taxable year.

Architectural/Transportation Tax Deductions, Internal Revenue Code Section 190 is a tax deduction of up to $15,000 a year to businesses for "qualified architectural and transportation barrier removal expenses."

7. Fulfillment of Executive and Legislative Mandates

In addition to these incentives, there are a number of federal laws that prohibit discrimination in many aspects of employment in private industry, the government, and third-sector organizations, as well as a series of presidential Executive Orders that are directed toward government agencies. The Executive Orders include requirements for federal agencies to formulate plans to increase employment opportunities for people with disabilities, promote employment opportunities for veterans, and develop a diversity and inclusion strategic plan. (For more on these mandates, see Appendix II, "Federal Executive Orders," on page 59.)

Americans with Disabilities Act (ADA), as amended

The ADA, which covers organizations with 15 or more employees, prohibits discrimination on the basis of disability in state and local government, the U.S. Congress, public accommodations, commercial facilities, and transportation and telecommunications services.[60] It also prohibits discrimination in recruitment, hiring, promotions, training, and pay; restricts questions a job applicant can be asked before an offer is made; and requires employers to make reasonable accommodations to the known physical and mental limitations of qualified individuals with disabilities unless doing so results in undue hardship to the employer. Public accommodations must comply with basic nondiscrimination requirements that prohibit exclusion, segregation, and unequal treatment. They also must comply with specific requirements related to architectural standards for new and altered buildings; reasonable modifications to policies, practices, and procedures; effective communication with people with hearing, vision, or speech disabilities; and other access requirements. In addition, public accommodations must remove barriers in existing buildings where they can do so without much difficulty or expense, given the public accommodation's resources. To be protected by the ADA, one must have a disability or a relationship or association with an individual with a disability.

Rehabilitation Act

The Rehabilitation Act prohibits discrimination on the basis of disability in programs conducted by federal agencies, in programs receiving federal financial assistance, in federal employment, and in the employment practices of federal contractors and subcontractors.[61] The standards for determining employment discrimination under the Rehabilitation Act are the same as those used in Title I of the ADA. The ADA requires affirmative action by federal agencies and contractors and subcontractors with contracts greater than $10,000. It requires federal government information and electronic technology to be accessible to both employees and members of the general public.

Telecommunications Act

The Telecommunications Act requires manufacturers of telecommunications equipment and providers of telecommunications services to ensure that such equipment and services are accessible to and usable by persons with disabilities.[62]

Architectural Barriers Act

The Architectural Barriers Act (ABA) requires that buildings and facilities that are designed, constructed, or altered with federal funds or leased by a federal agency comply with federal standards for physical accessibility.[63] ABA requirements are limited to architectural standards in new and altered buildings and in newly leased facilities. They do not address the activities conducted in those buildings and facilities.

The Uniformed Services Employment and Reemployment Rights Act (USERRA)

USERRA, which is enforced by the U.S. Department of Labor, prohibits employment discrimination against a person on the basis of past military service, current military obligations, or having applied to join the uniformed services.[64] An employer must not deny initial employment, reemployment, retention in employment, promotion, or any benefit of employment to a person on the basis of a past, present, or future service obligation. In addition, an employer must not retaliate against a person because of an action taken to enforce or exercise any USERRA right or for assisting in an USERRA investigation.

Conclusion

As viewed through six of the seven lenses discussed in this chapter, employees with disabilities are at least equal to employees with no disabilities. Through the cost lens, people with disabilities appear to be more costly employees than employees without disabilities, but only marginally more. Although more definitive research is needed, the available data make a strong case that people with disabilities are a solid business investment.

People with disabilities face a number of barriers, including discrimination in education and employment, low expectations, and limitations of the transportation system and accessibility barriers. To overcome these and other barriers, they often need to demonstrate extraordinary levels of persistence, resilience, and ingenuity. An old saying in employment goes, "Hire for character, train for competence." To overcome so many barriers, many people with disabilities have had to demonstrate exceptional character features and traits.

Organizational Readiness

In 2009, as noted previously, the participation rate of working-age people 21–64 with disabilities in the United States—the proportion who are employed or actively seeking employment—was 36 percent, compared with 76.8 percent for people with no disability.[65] Why is there such a significant disparity between the employment of people with and without disabilities? Some people with disabilities are so severely disabled that they are unable to work, while others cannot earn enough to warrant giving up government disability benefits. There are also a number of other reasons.

Lack of education As a population, people with disabilities are less educated than those with no disability. This is a disadvantage at a time when education is becoming a critical factor for employability. Through 2010, the proportion of people 25 and over with no disabilities and a bachelor's degree or higher was 32.1 percent, compared to 15.1 for people with disabilities.[66]

Transportation challenges Some people with disabilities face major obstacles in getting to and from work. In a 2010 survey, 18 percent of respondents with disabilities found access to transportation a major problem, while only 4 percent of people with no disabilities found this to be a problem.[67]

Workplace issues In a 2010 study, 17 percent of respondents said they believed they had been denied a job because of their disability, and 11 percent said they believed they had been refused a job interview for the same reason.[68] Once on the job, according to the same survey, 43 percent of people with disabilities said they believed they had encountered job discrimination.[69] Other people with disabilities have to contend with an unsupportive work environment and the lack of the resources needed to sustain their job success.

For businesses and other organizations, remedying these disparities requires a carefully defined strategy for attracting, engaging, and advancing people with disabilities. As depicted in Figure 2, a strategy for engaging employees with disabilities should manage six variables:

1 Top management commitment

2 Communications

3 An integrative infrastructure

4 The employment process

5 Measurement and self-disclosure

6 Organizational climate

Figure 2

Elements of strategy

Organizational Imperatives

Top management commitment | Communications | Integrative infrastructure | The employment process | Measurement and self-disclosure | Organizational climate
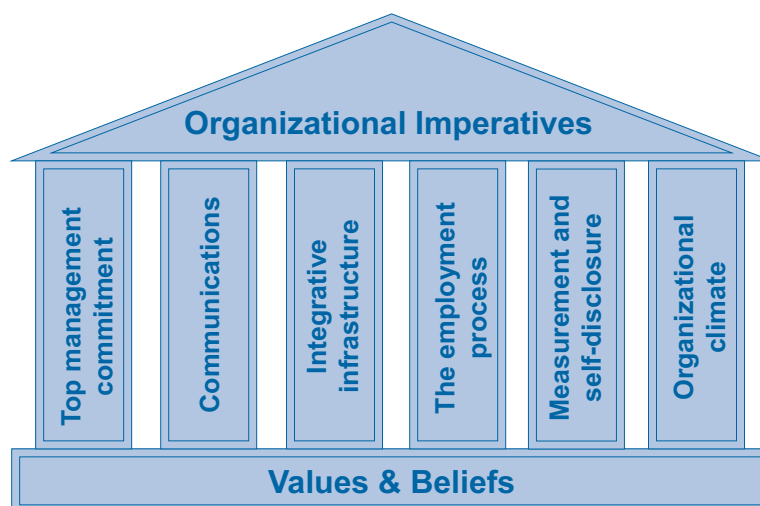
Values & Beliefs

In addition, the strategy should be built on a foundation of values and beliefs about diversity and inclusion and directed toward fulfilling high-level business objectives and organizational imperatives. This chapter identifies best practices for each of the six variables. Specific best practices for successfully employing people with disabilities are currently underdeveloped. Given this paucity of data, the authors reviewed the overall diversity literature and, where appropriate, applied findings from those reports to the issue of employment of people with disabilities. Many of the best practices listed above (e.g., obtaining top management commitment or crafting a communications strategy) are also, with the exception of their content, essentially the same for managing people with disabilities as for managing an strategic process.

Any strategy is fruitless, however, if it does not take into account the organizational change required to make it successful. Two critical elements of a strategy to employ people with disabilities are the ability of the strategy to integrate program initiatives so that they support one another and to inspire a high level of organizational commitment.
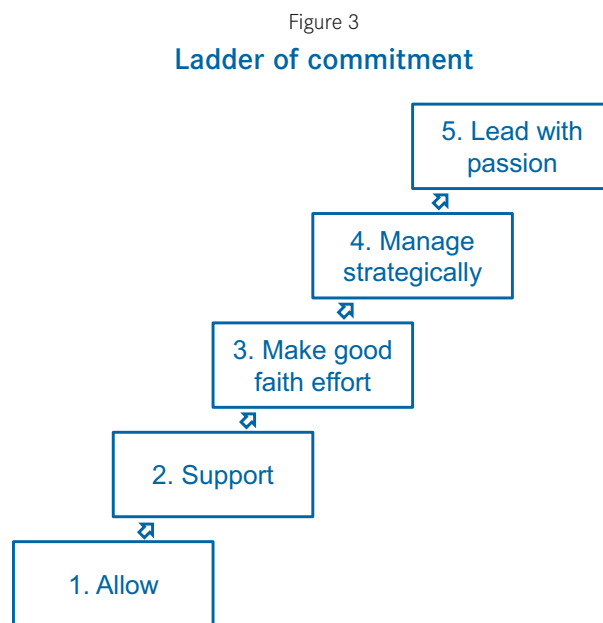
An illustration of how integration works can be found in the role training plays in a diversity strategy. A 2006 academic study of diversity training showed that "efforts to moderate managerial bias through diversity training" were relatively ineffective at "increasing the share of white women, black women, and black men in management."[70] It is not surprising that anti-bias training was ineffective, both because biases are so difficult to change and because training must be reinforced by management leadership, communications, measurement, organizational climate, and other program initiatives. (The change strategy planning matrix, a tool for creating an integrated change strategy, is discussed on pages 45-47.)

Building commitment to change starts with an understanding of who holds a stake in that change. Many change initiatives are based on the belief that if stakeholders have an honest and deep understanding of the change, they will be moved to support it. For this to happen, however, the stakeholders must both understand and be engaged before they take action.

At a minimum, engagement requires that the voices of stakeholders be heard and genuinely considered.[71] Organizations can hear the voices of their stakeholders through town meetings, surveys, and interviews and focus groups. The process of developing a strategy should model inclusion.

Top Management Commitment

In a 2000 survey of over 1,200 human resource managers, in both the federal and private sectors, "visible top management commitment" was regarded as the most effective strategy for lowering barriers to the employment and advancement of people with disabilities by both those from the private (81 percent) and government sectors (90 percent).[72] Commitment, however, can be an ambiguous term. Commitment may be a "deep and abiding action to employ people with disabilities" to one leader, while another may regard it as simply "a statement on the web page." One way to clarify what an organization really means in terms of commitment is to employ a "Ladder of Commitment" with five steps (Figure 3).

Figure 3
Ladder of commitment

5. Lead with passion

4. Manage strategically

3. Make good faith effort

2. Support

1. Allow

The steps are as follows:

Allow Top management gives managers permission to do what they believe is necessary to attract, engage, and advance people with disabilities as long as they meet their business objectives.

Support Top management provides some level of human and financial resources for initiatives.

Make a good-faith effort The organization makes a sincere attempt to effectively employ people with disabilities regardless of the outcomes of the actions taken. In some areas of disability law that require affirmative action, covered organizations must demonstrate a good-faith effort. If it is legally mandated, then covered organizations must start at this step.

Manage strategically Organizations formulate and implement a strategy for effectively employing people with disabilities that incorporates policies on top management commitment, communications, implementation infrastructure, the employment process, measurement and self-disclosure, and organizational climate, as well as employee engagement in the change process.

Lead with passion In the final step, top management commits to establishing a highly distinctive initiative, perhaps even one that is globally distinctive, to effectively employ people with disabilities. This stage includes the word "passion" because no leader without a true passion for employing people with disabilities will be able to achieve such lofty goals. Passion requires committing to be a role model for leaders within and outside of the organization. Such sustained passion creates a leadership legacy.

LEADING PRACTICE

To demonstrate true leadership, leaders need to establish the employment of people with disabilities as a clear priority, mobilize middle management, build a business case that resonates with their organization, place people with disabilities in leadership positions, aggressively communicate their commitment inside and outside of their organizations, and, ideally, find their passion. The efforts of effective top leaders extend well beyond winning external recognition and awards.

The primary purpose of top management commitment is to communicate organizational priorities. Effective commitment singles out the employment of people with disabilities as an organizational necessity, which clarifies organizational intent and direction, signals accountability, and properly allocates resources.

Another critical purpose of top management commitment is to mobilize middle managers and supervisors—the linchpins that connect organizational direction to action—in support of the employment of people with disabilities. Senior managers can mobilize middle managers and supervisors through a solid business case that defines why employing people with disabilities makes a vital contribution to the business.[73] To avoid any perceptions of insincerity, a business case must be endorsed by senior managers and believable to those in the middle. While references from research studies, such as those offered above, are an important component of a business case, the case must also be personalized with real-life examples and references to the organization's values and business goals. Sincere business cases present costs and benefits.

In building a business case for diversity, the senior leadership team at the DLP® Division of Texas Instruments started with the facts and figures. Top managers, however, soon realized they needed to personalize the business case. They started by making diversity (defined as "Diversity of Thought, Speaking the 'Language' of Our Customers, and Doing the Right Thing") one of their five pillars of growth. For each of the three definitions, they provided well-known examples of how the company had already benefited and could benefit in the future. The chief executive then took the business case on the road to communicate it to the full organization.[74]

A 2009 report issued by the Society for Human Resource Management (SHRM) suggested a number of steps for conveying leadership commitment to diversity practices, which have been adapted here for disability initiatives:[75]

- Actively contribute to the vision, mission, and strategy for disability inclusion efforts
- Adequately fund disability inclusion efforts
- Remove barriers to successful implementation of disability inclusion efforts
- Hold directors, managers, and supervisors accountable for spreading the disability plan to all levels of the organization
- Communicate the importance of disability initiatives to all stakeholders
- Attend workplace disability activities and events
- Sponsor or advocate for disability employee network groups
- Establish annual priorities for action for disability inclusion efforts

Of course, the best way to demonstrate top management commitment is to bring people with disabilities into the organization and its leadership ranks.[76] This not only sends a strong message that top management is "walking the talk," it also incorporates the valuable insights and experiences of people with disabilities into decision making and provides role models for leaders throughout the organization.

Communications

Communication about initiatives to employ people with disabilities serves a dual purpose. The first, which requires an internal communications strategy, is to engage employees by letting them know what is important, what is happening, and what they can do to support the initiative. Efforts to support this part of the strategy include:

Web presence A dedicated web page or section of the organization's intranet that can provide ongoing information on disability issues and offer links to disability resources and services inside and outside of the company. Such a site can also be used to publicize the successes and job-related contributions of employees with disabilities, as well as the overall progress of the organization.[77]

Internal communications Company newsletters, brochures, notice boards, email blasts, blogs, and in-house TV streaming can also be used to communicate organizational disability inclusion goals and progress and provide relevant disability information and resources.[78]

The second purpose, which is externally oriented, is to differentiate the organization from competitors in the marketplace for talent. A communication strategy should include objectives that are clearly defined in terms of target audience, message, and media to reach the desired audience.[79]

Besides a public commitment to hiring people with disabilities, external communication strategies include:[80]

Public relations Companies should publicize awards and/or recognitions for company efforts to create a workplace where people with disabilities can thrive. Organizations should also advertise such accomplishments in trade and mainstream media, seek opportunities to highlight corporate and individual success stories in the media, and participate in public events, discussions, and forums.

Marketing Employees with disabilities should be positively highlighted in marketing materials, websites, and advertisements.

Outreach Companies should fund national and local disability work programs, education programs, conferences, research, services, and other disability-related activities and organizations.

Integrative Infrastructure

Every organization should have a diversity infrastructure within its organizational structure that is responsible for the formulation and implementation of the diversity strategy and efforts to integrate activities across the organization. The responsibilities for effective employment of people with disabilities should be housed within the overall diversity infrastructure. One person from the diversity organization should have oversight of the formulation and implementation of the strategy for employing people with disabilities. In a smaller organization, this function could be the responsibility of the chief diversity officer (CDO) or even a staff person in human resources.

LEADING PRACTICE

Put someone in charge of attracting, engaging, and advancing people with disabilities and ensure that person has the support and resources he or she needs to be successful. Hold that person accountable for achieving all objectives related to people with disabilities.

Ideally, the CDO should report directly to the CEO to ensure the resources needed to fulfill the diversity & inclusion mission are available and efforts will be integrated across the organization. Accountability for elements of diversity typically rests with the legal, civil rights or EEO, human resources, and marketing functions. If the CDO reports to the head of human resources, as is often the case, the ability to effectively integrate across functions will be diminished, as will the CDO's ability to obtain required resources.

Many federal agencies face other challenges to effective integration. There are often three separate agencies—a civil rights organization to address compliance issues, a human resources or human capital organization to address staffing and training issues, and a separate diversity organization to address strategic and other operating issues. To harmonize these elements, there should either be one person with authority for all diversity activities or someone whose authority spans all the functional domains needed to oversee diversity. Given the functions involved, this is usually either the CEO or the COO. It is difficult to achieve a diversity strategy when the leader of diversity has limited control over the formulation and implementation of the strategy.

The integrative infrastructure has three functions:

1 **Compliance** This function is primarily rooted in the law and includes EEO reporting and analysis; anti-discrimination training; and the prevention, management, and resolution of complaints brought against the organization.

2 **Strategy** This function is responsible for the formulation and implementation of a strategic plan for diversity, including the "Elements of Strategy" (Figure 2 on page 17) and the integration of programs and practices across the organization.

3 **Operations** This function is responsible for the day-to-day diversity activities and programs associated with formulating and implementing the strategy and for supporting affinity or employee resource groups.

Councils and employee resource groups

In addition to the CDO and other individuals responsible for the employment of people with disabilities and other diverse constituencies, the diversity infrastructure should include a diversity council. Most organizations do not require a separate council for employees with disabilities, so this role can be performed by an active employee resource group or a subcommittee of the diversity council.

Effective diversity councils are typically chaired by the CEO or another officer whose span of control encompasses all diversity activities, functional and line-of-business heads, and representatives from diverse constituencies. Another effective model, which is also led by a senior manager, includes chairs or leaders of the employee resource groups. The primary functions of the diversity council, which should meet at least quarterly, are to ensure that diverse voices are heard, policies are set, members are educated about diversity, and effective integration is encouraged.

The infrastructure can also include employee resource groups if the organization is large enough to support them and it makes management sense. For example, because Section 508 of the Rehabilitation Act requires that the electronic and information technology used by the federal government be accessible to employees and members of the public, it makes good management sense for federal information and technology suppliers to establish employee resource groups for people with disabilities. (Leading practices are provided in the employee resource groups section and the case study on the AIM Network at KPMG on page 62.)

The Employment Process

As shown in Figure 4, the employment process flows from the initial job description to efforts for career development and advancement. While the order of the elements will differ from employer to employer, each organization will need to determine how each element applies to its individual circumstances.
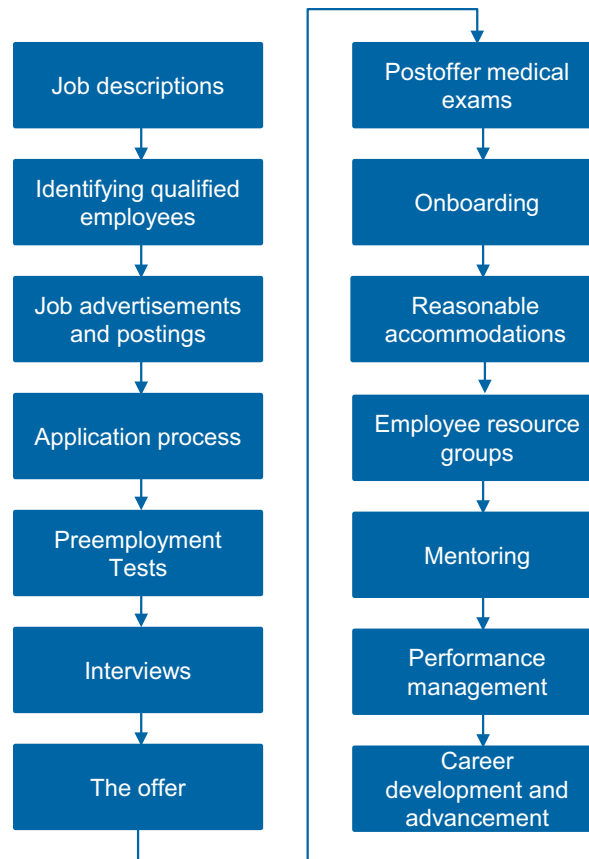
Job descriptions

Organizations should review their job descriptions and lists of essential job functions. Typical job descriptions may describe an ideal or customary profile of a job holder rather than list the essential requirements of the position. This practice may limit the extent to which candidates with disabilities are perceived as qualified.[81]

Under the ADA, applicants are considered qualified individuals with disabilities if they meet all legitimate skill, experience, and educational requirements and can perform the essential functions of a position with or without reasonable accommodations.[82] A job function may be considered essential for several reasons:

1 The position exists to perform the function (e.g., the bookkeeper position exists to perform the function of making journal entries, among other functions).

2 There are a limited number of other employees available to perform the function or among whom the function can be distributed.

3 The function is highly specialized, and the person in the position is hired for his or her special expertise or ability to perform it.[83]

Figure 4

The employment process

Job descriptions

↓

Identifying qualified employees

↓

Job advertisements and postings

↓

Application process

↓

Preemployment Tests

↓

Interviews

↓

The offer

Postoffer medical exams

↓

Onboarding

↓

Reasonable accommodations

↓

Employee resource groups

↓

Mentoring

↓

Performance management

↓

Career development and advancement

In identifying essential functions, employers should focus on the function and the desired result, not on how the function is currently or customarily performed, as individuals with disabilities may be able to perform the function in a different way and obtain the same result, with or without reasonable accommodations.[84]

While the ADA does not require employers to develop or maintain job descriptions, written descriptions that are prepared before advertising space is purchased or interviews for a position are conducted can be used as evidence of the essential functions of the position.[85] With this in mind, job descriptions should be kept up to date and should distinguish between essential functions and marginal functions that may be convenient to the employer but not essential to the position.[86] Language in job descriptions and postings should be screened to ensure it is not prejudicial to prospective applicants with disabilities.[87]

LEADING PRACTICE

To identify qualified employees with disabilities, find a partner in the placement business. State vocational rehabilitation agencies are a great place to start. Consider the character of the candidate along with competence in hiring decisions.

Identifying qualified employees

Many employers have found it difficult to locate job candidates with disabilities. Some cite a lack of familiarity with the various government and nonprofit agencies and for-profit recruiters that identify qualified candidates with disabilities, while others find themselves overwhelmed by the vast array of organizations available. The single most important recruiting strategy is to develop a partnership with a disability-related organization, including local nonprofit programs, job placement services for individuals with disabilities, and social service organizations.[88] These organizations can serve as powerful, low-cost resources through which employers can post jobs, locate new sources of workers, and find an array of workplace supports. Some organizations can also provide assistance with pre-employment skills training and on-site job coaching.

Partners can be found through:

- State Vocational Rehabilitation (VR) programs[89]
- One-Stop Career Centers, established by the U.S. Department of Labor, Employment and Training Administration in all 50 states[90]
- The Commission on Accreditation of Rehabilitation Facilities (CARF)[91]

Other strategies that have proved successful in recruiting people with disabilities include:

- Participation in employment fairs that target individuals with disabilities.[92]
- Volunteering to serve on the advisory boards of organizations for people with disabilities and participate in their events.[93]
- Inviting organization representatives to serve on company advisory boards and become more educated about the company's business goals and needs.

Educational institutions can also be rich employment pools. Recruiters can target schools and colleges that are known for serving students with disabilities, such as Perkins School for the Blind, The Carroll School (for students with learning disabilities), Gallaudet University, and the National Technical Institute for the Deaf.[94] Relationships should also be developed with career services offices at traditional colleges to secure their assistance in recruiting students with disabilities.[95]

RESOURCE
AskEARN.org

The Employer Assistance and Resource Network (EARN) helps employers recruit, hire, and retain employees with disabilities. EARN is part of the National Employer Technical Assistance, Policy, and Research Center at Cornell University, which is funded by the Office of Disability Employment Policy (ODEP) in the U.S. Department of Labor.

AskEARN provides information, guidelines and tip sheets, success stories, and links to a wide range of additional resources on such topics as affirmative action, hiring incentives, interviewing, job posting, sourcing of talent, veterans, and accommodations.

For more information, visit the Ask EARN website (www.askEARN.org) or call 1-855- AskEARN (1-855-275-3276).

If career service offices are not prepared to assist in recruiting students with disabilities, then recruiters should reach out to the organizations on campus that serve students with disabilities. Partnerships with local high schools and community colleges can also yield qualified candidates with disabilities.[96]

A variety of approaches to creating connections with educational institutions have been successful in cultivating a pipeline of employees with disabilities:

- Participating in already established unpaid or paid internship programs, targeting people with disabilities, or developing the organization's own targeted internship program.[97]
- Participating in co-op/apprenticeship programs with high schools and postsecondary institutions, which allow students to learn both on the job and in the classroom.[98]
- Establishing job shadowing and mentoring days.[99] A good time is National Disability Mentoring Day, which is sponsored by the American Association of People with Disabilities and takes place on the third Wednesday of every October (National Disability Employment Awareness Month).
- Serving as business advisors to school-based enterprises that engage students with disabilities, especially entrepreneurial enterprises.[100]
- Establishing scholarships for students with disabilities and participating in corporate visits to schools.[101]

Work-based learning experiences can benefit both students with disabilities and employers. Students gain general workforce readiness skills, specific job skills, and positive work attitudes and behaviors.[102] They are also able to identify necessary workplace accommodations, network, and learn about their career options. Employers benefit by gaining firsthand experience working with people with disabilities, which can dispel fears about employing people with disabilities on a full-time basis, demystify the accommodation process, illustrate how employees with disabilities can effectively contribute to the organization, and provide future candidates for employment.

Postsecondary institutions can also play a critical role in preparing future employees. One of the most outstanding postsecondary programs for preparing students to be independent while also training them for the workplace is that of the University of Illinois Urbana-Champaign (UIUC). (To learn more about the enabling and empowering environment at UIUC from a student perspective, see "Breaking the Odds at the University of Illinois Champaign-Urbana" on page 66.)

Finally, business leaders in other companies can be critical sources of information and support in identifying employment pools and developing effective recruitment strategies. Employers can establish connections with other businesses through organizations such as The Conference Board, the U.S. Chamber of Commerce's Institute for a Competitive Workforce, the U.S. Business Leadership Network (USBLN), the Society for Human Resource Management (SHRM), and the local Chamber of Commerce.[103]

Job advertisements and postings

To successfully use mass advertising to recruit people with disabilities, recruiters and hiring managers should target those media and job recruiting resources that have a large population of people with disabilities who are likely to qualify for the opening and ensure that job advertising is accessible to that population. A 2001 SHRM poll on search tactics found that 88 percent of human resource professionals use internet postings and 96 percent of job seekers turn to the internet, making it the most commonly used resource for job seeking.[104] A number of recruiting websites are now targeted to people with disabilities, including jobaccess.org and cosdonline.org, the latter of which is targeted toward students. Several magazines focus on people with disabilities, including *Ability Magazine*, *Active Living*, and *New Mobility*.

Job postings should appear in locations that are accessible to individuals with mobility disabilities, use large print for job notices at work sites or employment offices for individuals with visual disabilities, and include a TTY (telecommunications device for individuals with hearing disabilities) phone number.[105] The postings should also include a non-discrimination statement for people with disabilities.[106]

Online job postings should be reviewed for accessibility. Many technology companies offer software for testing the accessibility of websites (e.g., IBM Rational Policy Tester Accessibility Edition software). A 2002 review of selected e-recruiting websites for access by people with disabilities found that none passed the highest level of screening. The study also reported that the most common error was a lack of text to describe images for people with visual disabilities.[107]

Application process

Organizations should assess all elements of the application process, including application forms and recruitment locations, to ensure they are nondiscriminatory and accessible to individuals with disabilities. All application information should be accessible for persons who have mobility disabilities, are deaf or hard of hearing (e.g., need sign language interpreters, text telephone, or video captioning), or have visual or learning disabilities (e.g., require a reader, Braille, large print, or an audio version of the application).[108] Organizations should also regularly review the accessibility of online application systems for individuals with visual, hearing, finger dexterity, and cognitive impairments.[109] This is especially critical given the exponential increase in online application practices in recent years.

All physical recruitment and application locations should be reviewed to ensure access for individuals with disabilities, including restrooms, parking spaces, ramps, and elevators.[110] Tables, desks, or computers provided to fill out applications should also be accessible.

Prospective candidates should receive advance notice that reasonable accommodations will be provided during the application process.[111] If requested, organizations should provide reasonable accommodations for applications as long as they do not cause "undue hardship." The U.S. EEOC and the U.S. Department of Justice offers the following definition of this term: [112]

> "Undue hardship" is defined as "an action requiring significant difficulty or expense" when considered in light of a number of factors. These factors include the nature and cost of the accommodation in relation to the size, resources, nature, and structure of the employer's operation. Undue hardship is determined on a case-by-case basis. Where the facility making the accommodation is part of a larger entity, the structure and overall resources of the larger organization would be considered, as well as the financial and administrative relationship of the facility to the larger organization. In general, a larger employer with greater resources would be expected to make accommodations requiring greater effort or expense than would be required of a smaller employer with fewer resources.

Employers may invite requests for reasonable accommodations in job advertisements and application forms. Organizations can also help applicants anticipate any accommodations they may need by fully informing them of what the hiring process will entail (e.g., an interview, timed written test, job demonstration, etc.).[113]

Reasonable accommodations can take a variety of forms. According to the U.S. EEOC, reasonable accommodations "that may be needed during the hiring process include (but are not limited to):

- providing written materials in accessible formats, such as large print, Braille, or audiotape;
- providing readers or sign language interpreters;
- providing or modifying equipment or devices; and
- adjusting or modifying application policies and procedures." [114]

The importance of providing appropriate accommodations in the application process cannot be underestimated. Two of the EEOC's most critical victories in ADA employment matters over the past 20 years involved staffing agencies that failed to provide applicants who were deaf with the accommodations necessary to complete the application process.[115]

Preemployment tests

The ADA permits job testing that measures skills and the ability to perform job tasks. However, any employment tests administered to applicants must be based solely on the essential job functions required to fill the position and must be accurate measures of successful job performance.[116] Such tests should be administered to all employees applying for the particular position, not just employees with disabilities.[117]

Reasonable accommodations must be provided for testing. Tests should be administered in a format that does not require use of the applicant's impaired skill, unless the test is designed to measure that skill. For example, an accommodation for an applicant with dyslexia is to administer a written test orally, unless reading is the skill being tested. Prospective employees should be informed of testing in advance so that they can request reasonable accommodations if necessary.[118] Test sites and any equipment or technology used for testing should be accessible to candidates with disabilities.[119]

In one of the EEOC's most significant ADA-related lawsuits, 12 applicants with learning disabilities were unfairly screened out of manufacturing jobs at Daimler Chrysler Corporation by virtue of a preemployment test. In the consent decree, the company agreed to pay the rejected applicants damages ranging from $52,000 to $126,000 per applicant and to provide accommodations for applicants with reading disabilities going forward.[120]

Interviews

Reasonable accommodations, if they do not cause "undue hardship," are also required for interviews. Interviewers should be trained to provide reasonable accommodations for job applicants, well-versed in ADA requirements, and aware that they may not ask questions about an individual's disabilities.[121] When interviewing a person with a disability, the focus should be on the applicant's abilities, not disabilities.[122] The purpose of an interview is to gather information about an individual's educational background, skills, and work history; inquiries regarding the existence, nature, or severity of a disability are prohibited.[123]

In general, an interviewer may not ask applicants whether an accommodation is needed to perform the job, since doing so would likely elicit information about a disability. However, if the interviewer already knows that a disability exists (either because it was disclosed by the applicant or is obvious), and it is reasonable to question whether the disability would make certain specific job tasks difficult, the interviewer may inquire if an accommodation is necessary and, if so, what kind.

It is also permissible for interviewers to provide applicants with a detailed description of the job and ask whether they can complete the job functions with or without a reasonable accommodation.[124] For example, an employer may state the physical requirements of a job, such as the ability to lift a certain amount of weight or the ability to climb ladders, and ask if an applicant can satisfy these requirements.[125] Interviewers may also ask applicants to describe or demonstrate how they would perform a specific job function, with or without reasonable accommodation, as long as the same request is made of all applicants.

The offer

In preparing offer letters, employers must extend the same benefits and compensation as would be offered to similar candidates for the same position without disabilities.

Postoffer medical exams

The ADA prohibits medical examinations or disability-related questions, such as medical questionnaires, before a conditional job offer is made.[126] If medical exams or disability-related questions are required after the offer, they must be related to the job, consistent with business necessity, and required of all entering employees in the same job category.

All medical information obtained both preoffer and postoffer must be treated as a confidential medical record. It may be shared with only a very limited number of individuals:[127]

- Decision makers involved in the hiring process who need the information to ensure ADA compliance
- Supervisors and managers who should be aware of the employee's work restrictions and reasonable accommodations
- First aid and safety personnel may be told if the disability might require emergency treatment or assistance in evacuating a building
- Government officials investigating ADA compliance
- State workers' compensation offices, state second injury funds, or workers' compensation insurance carriers
- Insurers

Medical files must be kept separate from personnel files, and appropriate steps must be taken to ensure their security, such as using a locked file cabinet and designating a single person who has access.[128] In the case of electronic files, enterprise firewalls and encryption are typically used to separate files. Companies that keep medical records are increasingly outsourcing the maintenance of medical records for even tighter security.

Onboarding

Almost 90 percent of managers in a 2008 study by the Aberdeen Group—three-quarters of whom came from the human capital function—said they believed that new hires make the "decision about whether or not to stay at the company within the first six months on the job."[129] The period of time between the offer letter and the first few months on the job is critical for ensuring the engagement, retention, and productivity of new employees.[130]

Onboarding should be considered a process that begins with preparations prearrival and, ideally, proceeds through the first six months, or at least the first month, of employment. While over 90 percent of organizations in the 2008 Aberdeen Group study introduced employees to the company, enrolled them in the payroll process and benefit programs, set up required office equipment, and oriented them to their jobs, far fewer focused on the critical element of inculcating new employees in the culture and values of the organization.[131] Best practice companies in the study differentiated themselves from talent competitors by focusing on socialization into the company culture, offering new hire training programs, and assigning a mentor or coach to new hires.[132]

All facilities, presentations, and training materials, including online materials, should be accessible to employees with disabilities.[133] New employees should receive disability awareness training, including ADA or Rehabilitation Act compliance and etiquette toward employees with disabilities.

Reasonable accommodations

While accommodations are most commonly associated with physical or technical adjustments in the workplace to ensure access for individuals with disabilities, they can also entail changes to organizational policies and procedures that prevent employees with disabilities from working at their full capacity[134] or the reduction of physical and social barriers so that people with disabilities experience equal opportunity.[135] Reasonable accommodations tend to vary widely, depending on the severity and type of disability and the particular requirements of the job.[136] An excellent resource on reasonable accommodations is the Job Accommodation Network (see box below).

Employees with disabilities who qualify for a reasonable accommodation may often hesitate to request it.[137] For example, in a 2003 study of 121 people with inflammatory arthritis, osteoarthritis, or lupus, all but one experienced a work barrier. Of those, only 45 reported using an accommodation.[138]

RESOURCE

Job Accommodation Network (JAN)

JAN's consultants offer one-on-one guidance on workplace accommodations, the Americans with Disabilities Act (ADA) and related legislation, and self-employment and entrepreneurship options for people with disabilities. Assistance is available both over the phone and online. Those who can benefit from JAN's services include private employers of all sizes, government agencies, employee representatives, and service providers, as well as people with disabilities and their families.

Contact Information

By Phone From 9 a.m. to 6 p.m. ET, customers can call JAN toll-free to speak with a workplace accommodation expert at (800) 526-7234 or (877) 781-9403 (TTY).

Online AskJAN.org offers more than 300 disability-specific publications, as well as the Searchable Online Accommodations Resource (SOAR), which enables users to explore accommodation options for different disabilities and workplace settings.

Social Networks JAN connects with users through a variety of social media platforms, from Facebook and LinkedIn, to Twitter, blogs, and Second Life.

Variables that are likely to influence the likelihood that an employee will request an accommodation include the requestor's:[139]

- Awareness of his or her right to make an accommodation request

- Knowledge of the channel for making the request

- "Assessment of the extent to which an accommodation would be helpful in accomplishing work tasks and in pursuing equal employment opportunity"

- Belief about whether the request will harm her or his image

- Perception of the fairness of the request

- Belief about the likelihood of actual compliance with the request

- Sense of what others think he or she should do

- Belief about the degree to which the culture of the organization "supports and values the integration of people with disabilities"

- Understanding of "the extent to which an accommodation is extensive in terms of money, time, and inconvenience"

- Ability to have controlled the onset of the disability (the greater the perception of control, such as with drug addiction, the less likely the requestor will be to make the request)

Devising reasonable accommodations for workers with disabilities may have benefits for the workforce in general. For instance, one company devised a special tool for cutting metal strips to assist an employee with a cognitive disability.[140] This eventually resulted in general adoption of the tool.

Successful job accommodation is a team effort that depends on the active involvement of the individual with the disability, supervisors, and coworkers.[141] The employee with the disability, who is the most knowledgeable about her or his own capabilities and limitations, should be at the center of this process. While this may seem obvious, supervisors sometimes neglect to consult the worker involved.

Internal sources of expertise can often be of great assistance in designing reasonable accommodations. For instance, human resource representatives may be able to assist with job restructuring, facilities managers may be able to help with changes to the physical environment, coworkers may have suggestions for completing tasks differently, and technical staff may be able to devise useful tools.[142]

A reasonable accommodation should meet the following criteria:[143]

- **Effectiveness** It resolves the problem and allows the person with the disability to carry out the job successfully.

- **Transparency** It has either no effect on other employees and customers or improves the workplace for everyone.

- **Timeliness** It can be implemented in a reasonable amount of time.

- **Durability** It is useful and flexible enough to last the tenure of the employee's service and can be easily modified and updated.

Accommodations training The lack of appropriate employee training is a pervasive problem. In a 2003 survey of over 500 employers from industries across the United States, only 40 percent of respondents "provided training of any kind to their employees regarding working with or providing accommodations to people with disabilities."[154] Such training is especially important for frontline supervisors, who often have the most direct contact with employees with disabilities. These supervisors typically have a deep understanding of the actual functions and processes involved in a job, but they may know very little about how to assess the accommodations needed to ensure that an employee with a disability can execute the job successfully.

Common Accommodations

Flexible work arrangements

Flexible work arrangements tend to cost very little after up-front costs, which are typically the development of guidelines, policies, and training; and the managerial time needed to consider flexible work requests and set up training. In addition to an increased ability to attract and retain critical talent, a 2011 report by Corporate Voices for Working Families indicated that "individuals who have even a small measure of flexibility in when and where work gets done have significantly greater job satisfaction, stronger commitment to the job, and higher levels of engagement with the company as well as significantly lower levels of stress."[144] Flexible work options include:

- **Flextime** Schedules that permit employees to choose their starting and ending times within limits established by management.

- **Compressed workweek** A standard workweek compressed into fewer than five days. The most common are four 10-hour days and working nine-hour days for nine days with one free day over a two week period.

- **Telework/remote work** This option includes arrangements to work from home, the road, alternative office location, or client site.

- **Part-time** For those who choose to work less than 40 hours a week, benefits are usually prorated.

- **Job sharing** Two people voluntarily share the responsibilities of one job with benefits and salaries typically prorated.

- **Job carving** An existing job description is modified so that it contains one or more, but not all, of the tasks from the original job description.

Job coaches

Coaches are usually supplied by an outside agency (e.g., a state vocational rehabilitation agency) to offer advisory services to organizations and to provide workers with disabilities with specialized on-site training, including how to execute their jobs accurately, efficiently, and safely, and how to adjust to the work environment.[145] They also perform job analyses at work sites in order to match people with optimal positions, provide one-on-one training on a job site, and offer job retention services to employers and people with disabilities. Job coaches' involvement tends to decrease over time. Once the worker has acclimated, contact with the employee and supervisor takes place on an as-needed basis only.

Additional accommodations

- Leaves for treatment, recuperation, or training related to their disability.[146]

- Allowing an employee to exceed the maximum duration of medical leave.

- Provision of written materials in accessible formats (e.g., large print, Braille, or computer disk).[147]

- Modifications to equipment or devices (e.g., assistive technology that would allow a blind person to use a computer or allow someone who is deaf or hard of hearing to use a telephone).[148]

- Physical modifications to the workplace (e.g., reconfiguring a workspace, including adjusting the height of a desk or shelves for a person in a wheelchair).[149]

- Changes to marginal or nonessential job tasks.[150]

- Reassignment to a vacant position.[151]

- Modifications to examinations, such as allowing extra time on a test during the job application process.[152]

- Qualified readers or interpreters.[153]

They may also be unaware of organizational policies and procedures for obtaining reasonable accommodations and resources for facilitating them.[155]

Supervisors' limited knowledge may be due to a lack of familiarity with readily available accommodations resources. Almost one-half of the federal human resource managers surveyed in a 2002 study of disability employment practices were unaware of common accommodation resources (e.g., Job Accommodation Network, Disabilities Services Office, etc.).[156] This was true even of those supervisors who had experience supervising employees with disabilities. More experienced supervisors did, however, have more awareness of the resources available through independent living centers, state rehabilitation agencies, and external health care providers.

Supervisory training on accommodations should include:

- ADA regulations regarding reasonable accommodations;
- information about making accommodations for disabilities (both generally and for prevalent industry-related disabilities); and
- guidelines for locating and using both internal and community resources to support workers with disabilities.[157]

Centralized systems for accommodations To support employees with disabilities, organizations should centralize their systems for providing accommodations. Centralization increases the efficiency of providing accommodations, creates an organizational center of excellence, and removes the potential for capriciousness from the accommodation process. Centralization typically includes:[158]

- A company-wide fund for providing accommodations
- A designated office or person to address accommodation questions
- A formal, documented decision-making process for the provision of accommodations
- An established grievance procedure to address reasonable accommodation issues
- Data gathering on costs and types of accommodations
- Regular corporate review of site-specific accommodation progress

Information technology (IT) accommodations In recent years, there has been exponential growth in the use of computers and internet-based technology in the workplace.

Companies increasingly rely on both company intranets and the world wide web to carry out essential organizational processes—recruiting, hiring, disseminating benefits information, training, receiving employee feedback, attracting new customers, purchasing, and conducting online meetings.[159]

While computer and internet use has expanded in unprecedented ways, employers' knowledge of appropriate accommodations and assistive technologies has not kept pace. The ADA requires reasonable accommodations in all areas of employment, including information technology. The ADA and a number of other laws require web accessibility, including Sections 501, 504, and 508 of the Rehabilitation Act, as amended, and Section 255 of the Telecommunications Act of 1996.[160]

> "The power of the web is in its universality. Access by everyone regardless of disability is an essential aspect."
>
> Tim Berners-Lee
> W3C Director and inventor of the world wide web

A 2012 review of over 1,680 state and federal government websites found that only 4 percent were compliant with World Wide Web Consortium (W3C) standards or the Section 508 of the Rehabilitation Act and only 5 percent met standards for accessibility.[161] Few commercial websites are accessible.[162]

Information technology accessibility barriers Strategies for reducing information technology barriers in the workplace include the following:[163]

- Increase the organization's specific expertise or technical assistance on technology accessibility issues.
- Develop and promote uniform guidelines to make web-based employer processes accessible (those promoted by Section 508 of the Rehabilitation Act for the federal government serve as one model).

RESOURCE

W3C Web Accessibility Initiative (WAI)

WAI develops strategies, guidelines, and resources to help make the Web accessible to people with disabilities. For more information, visit their website (www.w3.org/WAI).

- Design and implement web-based human resources processes with accessibility in mind.

- Make information about resources on IT access readily available throughout the organization.

- Provide training for technical staff, human resources staff, and selected personnel, including supervisors, and occupational, safety, and medical staff, on IT accessibility issues, including:

  - the general employment disability nondiscrimination requirements of the ADA
  - the reasonable accommodation process
  - Web IT accessibility guidelines
  - computer workstation accommodations
  - common computer and software accommodations for individuals with specific disabilities, such as visual or fine motor disabilities
  - resources to find further information to respond to accommodation requests

Reframing reasonable accommodation The term "accommodation" conjures the image of charity or a special favor for a person with a disability. The term "reasonable" could be assumed to mean support for accommodations by mollifying those who might be concerned about their financial and organizational costs. These assumptions need to be reconsidered.

Employers provide accommodations for many employees—ergonomic chairs to accommodate back problems, learning and development to accommodate the need for skills and capabilities, laptops and smartphones to accommodate peripatetic employees, and even corporate jets to accommodate the schedules of senior executives. If you asked a corporate leader why he or she uses a company plane, the answer would likely be that it benefits the business. It is the same for reasonable accommodations provided to employees with disabilities. They are simply a way of providing an individual employee with a business-benefiting capability that they may not currently have.

Consider the senior executive who is a great operations person. While he or she might be gifted at keeping the organization on track, there are many people who are gifted at execution that do not have a comparable strategic capability. So what do they do? When strategic challenges arise, they hire a strategy consultant or a strategy staff person (i.e., they make an accommodation for a weak or nonexistent capability).

The concept of "reasonable accommodation" needs to be reframed from a low-cost favor provided to an employee with a disability to an improvement that advances the business. A better term might be "work optimization."

Employee resource groups

Employee resource groups (ERGs) for people with disabilities, also called affinity groups and employee networks, have multiple purposes, including business development; testing and review of products, services, policies, and processes; professional development and mentoring; cultural awareness; issue identification; community outreach; recruiting; onboarding; and mutual support and socialization. Yet despite the positive results that an ERG can achieve, a 2010 survey found only "12 percent of employed people with disabilities report that their organization offers a disability-focused ERG."[164] To make ERGs successful, the first step is to ensure that the purpose is well-defined. Other elements of success include top management sponsorship, collaboration with other ERGs, recruiting and retaining, inclusion, communications, and measurement. Ultimately, the success of any ERG for people with disabilities depends on the willingness of employees to disclose their disabilities. (For an example of an organization that has a highly successful ERG, see the case study on the AIM Network at KPMG on page 62.)

LEADING PRACTICES

Identify a top executive with a passion for advancing people with disabilities or who is a passionate caregiver to chair or sponsor the group. Tightly define the purpose. Institute an ongoing state-of-the-company focus group composed of a cross-section of ERG members to bring the voice of the grassroots to the top. Create internal partnerships with business units and functions that target and realize revenues (or could) from customers with disabilities and their caregivers. Conduct workplace, product, and customer accessibility assessments. Get involved in recruiting. Foster career and leadership development.

Well-defined purpose With no defined purpose, ERGs tend to gravitate toward an advocacy role. While using an ERG to capture the concerns of people with disabilities is vital, it should not be the only purpose. The mission of an ERG should evolve to stay in tune with changing business needs, employee demographics, and the needs of ERG members. No "best purposes" transcend all employers. As IBM prepared to launch its eight task forces, including one for people with disabilities, the company asked four questions:

1 What is necessary for your constituency to feel welcome and valued at IBM?

2 What can the corporation do, in partnership with your group, to maximize your constituency's productivity?

3 What can the corporation do to influence your constituency's buying decisions, so that IBM is the preferred solution provider?

4 And what external organizations should IBM form relationships with to better understand the needs of your constituency?[165]

Each task force was led by two or more executive cochairs who were members of the constituency. Each task force also had one executive sponsor who was from the IBM Worldwide Management Council, typically a senior vice president who reports to the CEO.[166]

Top management sponsorship Top leaders, who need not be constituency members, lend their status, network, and ability to garner resources for the ERG and connect the constituency's grassroots voices to the top, while raising their own personal awareness of the constituency's concerns and gaining a better understanding of how the work of the ERG ties to the business goals of the organization.

Collaboration By working together, ERGs can promote the sharing of leading practices and resources, create a common voice for diversity and inclusion, provide networking opportunities for constituency members, and increase mutual understanding of the challenges faced by different constituency groups. At BT, the British telecommunications giant, the 10 employee networks consult with all the other networks when they are considering an event. "An automatic invitation also goes out to the other network chairs, asking them to encourage their members to participate."[167]

Recruiting and retention of members This is a constant concern of ERGs, as it is for most volunteer organizations. Factors that attract and engage members include the recognition that members have "day jobs" when asking them to assume responsibilities; demonstrated care in fitting members to roles, especially leadership roles; and an apparent understanding of the interests of members, especially their career interests. Membership in an ERG should offer access to opportunities for training, leadership development, and assignments that will help advance members' careers.

Inclusion The ERG should be a vehicle for ensuring that the voices of constituents are heard at the top, as well as a vehicle for providing the mutual support and confidence-building that will enable members to make their own voices heard. Maintaining a focus group or series of focus groups made up of constituency members is an excellent way to keep the ERG relevant. By summarizing focus group input for the executive sponsor and other senior leaders, it places constituents' points of view in front of leadership.

Communication As discussed earlier in this report, communication efforts should be focused internally (to keep employees informed about the activities of the ERG, convey resources, and promote membership) and externally (to establish the organization's talent brand). ERGs should work with an organization's communications or public information group.

Measurement Ultimately, measurement should focus on the objectives and targets of the ERG. For example, an activity to communicate etiquette toward people with disabilities might have an on-time completion measure, as well as a short written evaluation by those who participated.

Mentoring

Mentors can provide support, counsel, and constructive examples for employees with disabilities as they acclimate to the work environment and their job responsibilities, as well as throughout their career life cycles.[168] A 2010 study reported that almost one-fifth (18 percent) "of employed people with disabilities are matched with a mentor at work"; 72 percent of "employees with disabilities who have mentors agree[d] that [their mentors] play an important role" in their success at work. [169]

In addition to traditional mentoring between a more senior mentor and a more junior mentee, many forms of mentoring have proven effective for people with and without disabilities.[170]

Peer mentoring A mentor close in age, rank, and experience to the mentee provides support and guidance in an informal way, or an employee with a disability provides mentorship, usually to someone with a similar disability. Peer mentoring can also be done in groups, typically as leadership development around a series of topics, such as career self-management, influence skills, and effective communication skills.

Group mentoring A mentor, often a more senior leader, works with a group of mentees with common interests and needs.

E-mentoring A mentor advises a mentee through e-mail or other online media.

Flash Mentoring "A one-time meeting or discussion that enables an individual to learn and seek guidance from a more experienced person who can pass on relevant knowledge and experience."[171]

Successful traditional mentoring programs include:[172]

- Prescreening of mentors
- Regularly monitoring mentoring matches
- Providing training for mentors, both before a match and during the mentoring process
- Focusing on the needs and interests of the mentee, not the expectations of mentors
- Ensuring that appropriate levels of visibility and accountability are built into the mentoring relationship
- Engagement over an extended period; typically, the longer the mentoring relationship continues, the more positive the outcome

Mentoring can be mutually beneficial. In addition to the benefits provided to mentees, mentors can experience increased self-esteem, a sense of accomplishment, increased patience, and improved supervisory skills.[173] They also might learn something about employees with disabilities. More generally, employers gain other advantages from mentoring, which can serve as a method for promoting professional development, an effective retention tool, and a source of improved supervisory skills, work habits, productivity, and job satisfaction among employees.[174]

Performance management

Employers can also use performance management systems to support disability goals and an inclusive climate. For example, performance appraisals of supervisors and managers should include evidence of progress toward recruitment, hiring, retention, and advancement goals for employees with disabilities, and employers should acknowledge high performance in these areas with recognition and rewards. Care should also be taken to guard against performance management systems and evaluations that discriminate against employees with disabilities.[175]

> **LEADING PRACTICES**
>
> Incorporate goals for attracting, engaging, and advancing people with disabilities into every manager's and supervisor's performance plan. Support and manage them relentlessly to ensure they achieve their goals.

Career development and advancement

While employers may have strategies in place to recruit and hire people with disabilities, they seldom have corresponding strategies to ensure the career development and advancement of employees with disabilities. Employees with disabilities are less likely to hold supervisory positions than their colleagues without disabilities.[176] Career activities undertaken by both employees and organizations are important in explaining employee engagement and career success.[177] For organizations, those activities might include training, assessment centers, mentoring, and succession planning.

Because of potential advancement-limiting bias, career self-management can be a particularly important tool for people with disabilities. Organizations can encourage career self-management by supporting learning and development initiatives in four areas: career exploration, development of career goals, career strategy, and career appraisal.[178] Career exploration seeks information about an individual's values and interests, strengths and weaknesses, aptitudes, and career interests. Development of career goals focuses on the employee's certainty about her or his career goals and the pathway to those goals.

Career strategies include developing networks of colleagues and career stakeholders, creating opportunities by seeking relevant skills and knowledge and taking leadership, and self-nominating by keeping aspirations and qualifications in front of career stakeholders. A career appraisal reviews progress against career goals, reconsiders those goals and loops back to career exploration and goal setting. Active participation in career self-management helps employees with disabilities be more informed and better able to address potential bias.[179]

In rare cases, organizations are providing leadership development initiatives for underrepresented groups, including people with disabilities, either themselves or through third parties. UCLA offers a leadership development program specifically designed for people with disabilities.

UCLA Anderson Leadership Institute for Managers with Disabilities

All of *Businessweek*'s top business schools offer leadership development programs in their executive education departments, ranging from Columbia's "Realizing Leadership Lessons from Some of Shakespeare's Greatest Characters" to Kellogg's "The Soul of Leadership." Most offer programs related to negotiations, change management, finance, and strategy, and a few offer programs designed for women. The UCLA Anderson School of Management is the only one to offer leadership development for people with disabilities, which the school offers in addition to leadership programs for African-American, Latino, women, and LGBT managers.

The Leadership Institute for Managers with Disabilities aims to have a positive effect on both participants and their organizations. Alissa Materman, executive education programs director, is fond of telling stories of program graduates who have gained insights into their disabilities that have led to improved performance and advancement back on the job.

Materman also points to the deep relationships and mutual support that can only come from a program of true peers. In an interview, Tim Kaiser, a participant who is blind, said:[180]

> I realized I needed to get rid of the idea that my disability is a hindrance. It actually pushed me to work harder. However, I struggled with the nuances of being blind and being a competent leader. I also had to deal with my preconceived notions about different disabilities and find ways to interact with other participants, showing me how colleagues adjust for me. The institute helped me come to terms with that and empowered me with role models nationwide.

Kaiser is now director of education initiatives for the United States Holocaust Memorial Museum.

The leadership experience, which takes five months, is primarily virtual, but does include a three-day intensive onsite learning experience on the UCLA Anderson School of Management campus. After a virtual kickoff, the program focuses on personal and 360-degree leadership assessments. In the second month, participants begin individual coaching and do prework for the three-day intensive experience. During the on-campus session, participants focus on such topics as leadership styles and skills, organizational savvy, determining the "lay of the land," negotiations, mentoring, and networking. They are also grouped into peer coaching clusters with other participants. In the final months of the program, there is individual and peer coaching, culminating in integrating the experience and the development of a leadership action plan. Throughout, there is an emphasis on action learning, using a customized tool called the Action Journal.

Natural workplace support, or support from supervisors and coworkers that occurs naturally in the workplace, is also critical to the success and advancement of employees with disabilities.[181] Natural workplace support includes supervision (ongoing feedback on job performance), training (learning a new job skill), opportunities to socialize with coworkers, and informal mentoring. Because employees with disabilities may face biases and experience isolation in the workplace, they can often be denied the numerous benefits of natural workplace support.

Disability Management

The field of disability management (DM) emerged in the mid-1980s in an effort to control employers' disability-related costs. With the passage of the ADA and the growth of efforts to employ individuals with disabilities, DM has grown by leaps and bounds.[182] DM is a strategy for preventing the onset of short-term and long-term disabilities and for facilitating the early return to work and continued workplace participation of employees with disabilities.[183] Early-return-to-work policies help employees recover while also reducing disability costs for the organization, preventing the loss of experienced workers, and improving productivity.

DM programs integrate individual care, benefits, and case management components to streamline processes and reduce costs.[184] At the most basic level, DM programs coordinate occupational and nonoccupational disability benefits and absence and paid leave programs. However, in an effort to promote overall workforce health and improve administrative processes for both the employer and the employee, many companies go beyond this to include coordination of health care, employee assistance programs (EAP), behavioral health care, health and wellness promotion, and medical case management services.

Measurement

Measurement to determine the impact of programs, policies, and practices for successfully employing people with disabilities is particularly challenging. First, few organizations measure their success at employing diverse groups, let alone their accomplishments with people with disabilities. Indeed, just over one-third of respondents to a 2010 survey said they had a method for measuring the impact of their overall diversity practices (Chart 3). Second, measurement requires disclosure. Although more than three-quarters of people with disabilities report that they've told *someone* of their disability at their place of work,[185] people with less visible disabilities are less likely to disclose, people disclose at different points in the employment process, and the person to whom someone discloses may not be the person who needs to know.[186]

LEADING PRACTICES

Include measures on people with disabilities and caregivers in the employee survey. Measure for understanding (to determine a strategic focus) and results (to determine real, unvarnished outcomes). Design the survey to measure both performance and importance, then target for action those high leverage areas that are high on importance and low on performance. Link the survey to a measure of employee engagement.

Chart 3

Just over one third of respondents to a 2010 study said they had a method to measure the impact of their diversity practices.

Yes ■   No ▢

2010
(N=200)

| 36% | 64 |

2005
(N=227)

| 38% | 62 |

0   100%
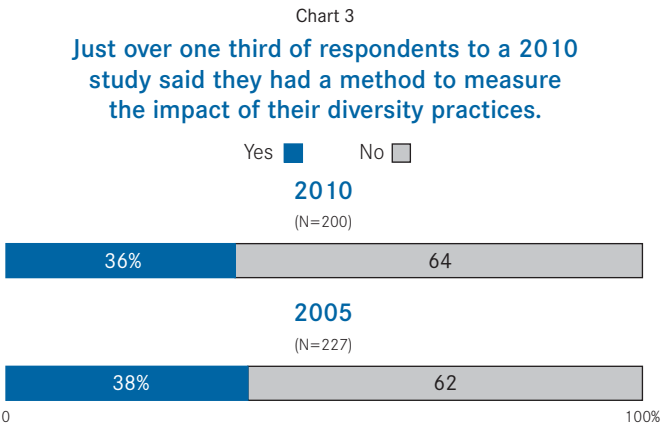
Source: "Workplace Diversity Practices: How Has Diversity and Inclusion Changed Over Time? A Comparative Examination: 2010 and 2005," Society for Human Resource Management, 2010 (www.shrm.org/Research/ SurveyFindings/Articles/Pages/WorkplaceDiversityPractices).

The employment of people with disabilities scorecard

It is possible to use a scorecard model to assess organizational priorities and measure outcomes for people with disabilities based on best practices similar to those used in measuring overall diversity outcomes. This scorecard includes five measures, which, to the greatest degree possible, should be linked to organizational outcomes (Figure 5).

Accountability This is measurement against assigned objectives and targets. Accountability is typically established as either central measures of disability initiatives (e.g., number of mentoring relationships established in a quarter or employee resource group membership goals) or as a set of decentralized objectives that are left up to the various lines of business to define. Each objective should have a target that a team member is responsible for meeting. Achievement against those objectives should be reviewed by the diversity council or senior management at regular intervals.

Vendor diversity This metric usually assesses the dollars spent with vendors who are owned or predominately owned by people with disabilities or, if not owned by people with disabilities, have achieved certain standards (e.g., employ a certain percentage of employees with disabilities; offer prescribed programs, policies, and initiatives).

Figure 5

Employment of people with disabilities scorecard

The work environment/culture A sense of the workplace culture is most easily determined through a set of questions in the employee survey or a separate survey. At the very least, all employee surveys should contain questions that allow people with disabilities to identify themselves confidentially. By offering this option, survey responses can be analyzed to determine whether there are differences between people with disabilities and the general employee population. Ideally, questions should address four aspects of the work environment of importance to people with disabilities:[187]

- **Psychological safety** Employees with disabilities are free from harassment, discrimination, and intolerance, and free to speak up without fear of reprisal.
- **Valuing differences** Differences are respected, valued, and leveraged to the advantage of the organization.
- **Inclusion** Employees with disabilities are welcomed, encouraged to express their ideas and opinions, and feel those ideas and opinions receive a fair hearing. Managers value inclusion and are skilled at creating it.
- **Advancement through merit** All recruitment, employment, development, promotion, and compensation decisions are made purely on the basis of objective merit (i.e., the playing field is level for all).
- **The representation pipeline** This element measures the number of people with disabilities at several points—from sourcing of talent to advancement—in the employment pipeline (Table 2 on page 36). The pipeline often includes both outcome and diagnostic measures. Representation data can be aggregated in a pipeline report (Chart 4).

Chart 4

2011 pipeline report
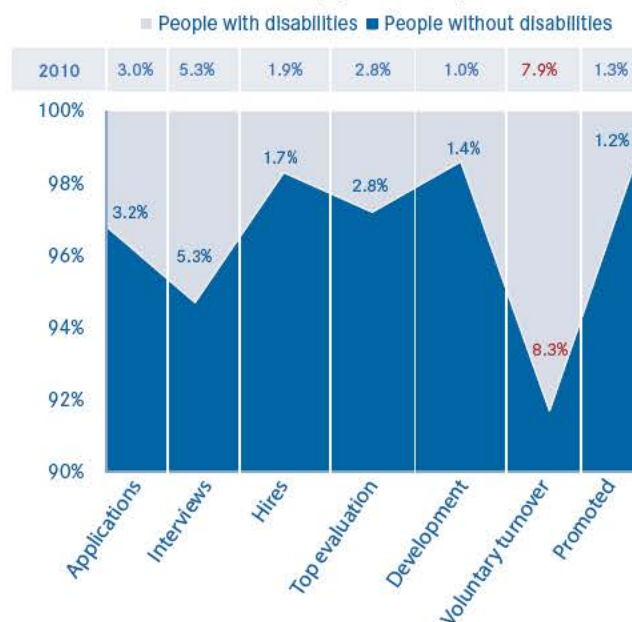
This format measures outcomes by improvement over previous years and diagnostics by the proportion of people with disabilities at each step in the pipeline. Chart 4 on page 35 shows the percentage of people with disabilities at various steps along the pipeline—from percentage of applications from people with disabilities to the percentage of people with disabilities who were promoted. Except for voluntary turnover, a higher percentage of people with disabilities in an individual category equals greater success for people with disabilities. (Since voluntary turnover indicates an employee is leaving under his or her own volition and not for cause, employers prefer lower percentages.)

The pipeline in Chart 4 offers two comparisons: 2011 against 2010 and a comparison of how well people with disabilities are progressing along the pipeline in any time period (in this case, the 2011 calendar year).

The percentages in Chart 4 express the proportion of people with disabilities in the total pool of people at that stage of the pipeline. An analysis of the chart reveals that, year over year, applications from people with disabilities have gone up (a positive), but hires have declined and voluntary turnovers have increased (both negatives). In terms of progress along the pipeline, this organization is having mixed results.

Table 2
Representation pipeline measures

Step	Component	Metrics
1	Sourcing	Proportion of spending on recruitment of employees with disabilities by source
		Proportion of overall recruitment spending on employees with disabilities
		Proportion of applications from employees with disabilities by source
		Average spending per application by source
2	Interviewing/ screening	Proportion of total interviews with employees with disabilities
		Proportion of people with disabilities interviewed by hiring manager
		Proportion of people with disabilities interviewed by job level
		Proportion of people with disabilities interviewed by business/functional unit
3	Hiring	Proportion of people with disabilities hired
		Proportion of people with disabilities hired by hiring manager
		Proportion of people with disabilities hired by job level
		Proportion of people with disabilities hired by source
		Proportion of people with disabilities hired by business/functional unit
4	Evaluation	Proportion of people with disabilities at each rating level
		Proportion of people with disabilities at each rating level by supervisor
		Proportion of people with disabilities at each rating level by business/functional unit
5	Development	Proportion of people with disabilities receiving developmental assignments by type of assignment
		Proportion of people with disabilities receiving developmental assignments by supervisor
		Proportion of people with disabilities receiving developmental assignments by business/functional unit
6	Retention	Voluntary turnover of people with disabilities by supervisor
		Voluntary turnover of people with disabilities by business/functional unit
		Involuntary turnover of people with disabilities by supervisor
		Involuntary turnover of people with disabilities by business/functional unit
7	Advancement	Proportion of people with disabilities at each level
		Proportion of people with disabilities projected for each level in succession planning system
		Proportion of people with disabilities at each level by business/functional unit
		Proportion of people with disabilities projected for each level by business/functional unit in succession planning system

In terms of applications in 2011, 3.2 percent came from people with disabilities, and 5.3 percent of its interviews were with people with disabilities. What does this tell us? Since a greater percentage of people were interviewed than applied, either the organization is aggressively seeking interviews with people with disabilities or its applicants from that population are more highly qualified than applicants with no disability—a positive in either case. While 5.3 percent of those interviewed were people with disabilities, only 1.7 percent of the hires were people with disabilities. The representation of people with disabilities fell by more than two-thirds between application and hire. This is a very significant drop off. Is this because of bias among hiring managers? Has the organization been over zealous in advancing people with disabilities to interviews? This finding warrants further investigation.

A look at promotions reveals that only 1.2 percent of the promotions are going to the 1.7 percent of people with disabilities hired by the organization. In addition to being a potential reflection of bias, this finding may indicate that people with disabilities are declining promotions in larger numbers than other members of the employee population. As can be seen in these examples, analyzing progress along the pipeline does not necessarily provide answers, but it does narrow the possible root causes of poor performance, providing greater focus on areas that need remediation.

Talent development Although this element may be considered an element of work environment/culture, many leading practice organizations make it a separate component of the scorecard.

A widely used practice for measuring talent development is Kirkpatrick's four steps of evaluation:[188]

1 **Reaction** Did the learners find the learning process useful and meaningful? (This is often called the "smile test.")

2 **Learning** To what extent did learners acquire the knowledge and skills that were the objectives of the learning process?

3 **Behavior** To what degree were learners able to apply the knowledge and skills back on the job?

4 **Results** What are the tangible organizational benefits from the learning process in terms of productivity, cost reduction, quality improvement, greater efficiency, etc.?

Linking Measurements to Organizational Outcomes

From a measurement standpoint, it is difficult to directly link activities aimed at employing and advancing people with disabilities to organizational outcomes. The successful achievement of prescribed organizational outcomes is dependent on many factors, such as the practicality of the outcome, the successful deployment of the outcome to the organization, execution, the organizational culture, and programs, policies, and practices aimed at improving the employment of people with disabilities. With so many causes, determining what impact each factor has on organizational outcomes is difficult without having experimental controls, something that is rarely available in organizational measurement. This problem is typically addressed by either establishing a logical link between disability initiatives and organizational outcomes or using employee engagement as a proxy for organizational outcomes.

To create a logical link, start with the organizational outcome and work backward to define the disability initiatives. For example, suppose a business has a revenue goal for software. To ensure that the software is accessible, the company hires people with disabilities to develop the software. Accountability targets would be established for hiring a specific number of people with disabilities at various skill and knowledge levels. Outcome measurement would compare actual results against hiring targets, which would offer a logical link to achieving the software revenue goal.

To use employee engagement as a proxy requires a measure of employee engagement. Typically, this measure is included into the employee survey that assesses the work environment/culture. For example, WFD Consulting has synthesized a long employee engagement survey down to seven questions that form an index.[189] By dropping that index into a survey, the previously mentioned cultural factors—psychological safety, valuing differences, inclusion, and advancement through merit—or any question in the survey can be correlated with the index to determine which factors or questions are most highly correlated with employee engagement. A survey typically measures how well employees believe the organization is performing on those factors. By looking for factors on which the organization is performing poorly and that have high correlations with employee engagement, the highest leverage opportunities for organizational improvement can be identified. For example, if mentoring has a high correlation with employee engagement, but employees rank performance low, it suggests that there is considerable space for improving mentoring.

Effective measurement is highly dependent on the willingness of employees with disabilities to identify themselves. Even in confidential, anonymous surveys, employees may hesitate to identify themselves as a person with a disability if they fear that their survey can be traced back to them. The next section examines the challenges and risks of self-disclosure and approaches for overcoming them.
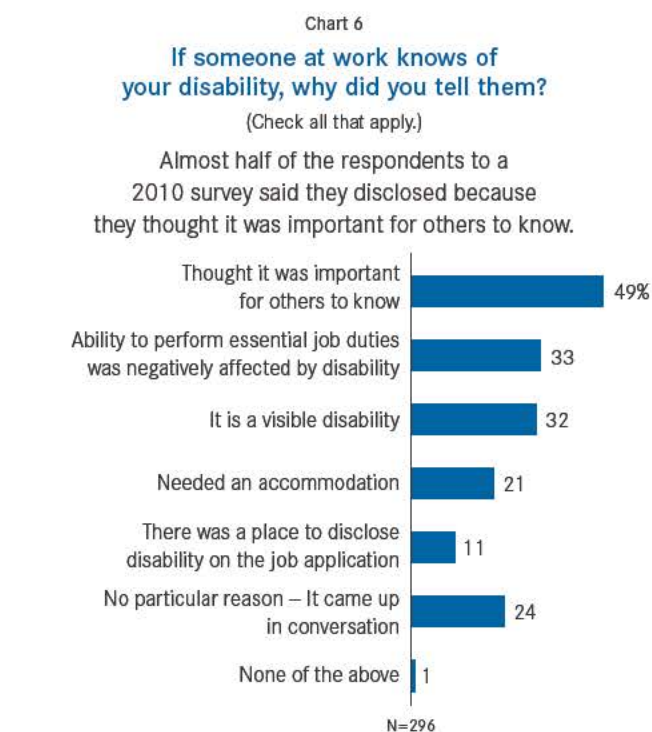
Self-Disclosure

If companies are going to use measures to improve their organizational support of employees with disabilities, those employees must be willing to identify themselves. This can be difficult because, even in confidential and anonymous surveys, employees with disabilities may be hesitant to identify themselves if they fear that their survey can be traced back to them. The challenge is to encourage employees with disabilities to disclose their disability to the person who needs that information at the time that they need it.

The evidence examined by the research working group, however, reveals that when employees with disabilities perceive barriers to self-disclosure, they are guarded in their disclosure. In one national survey from 2010, 78 percent of employed people with disabilities indicated that *someone* at work knew of their disability, most often a coworker or immediate supervisor, although that information may never have been officially documented by the organization (Chart 5).[190] Respondents to that survey also indicated a wide range of reasons for why they disclosed (Chart 6).
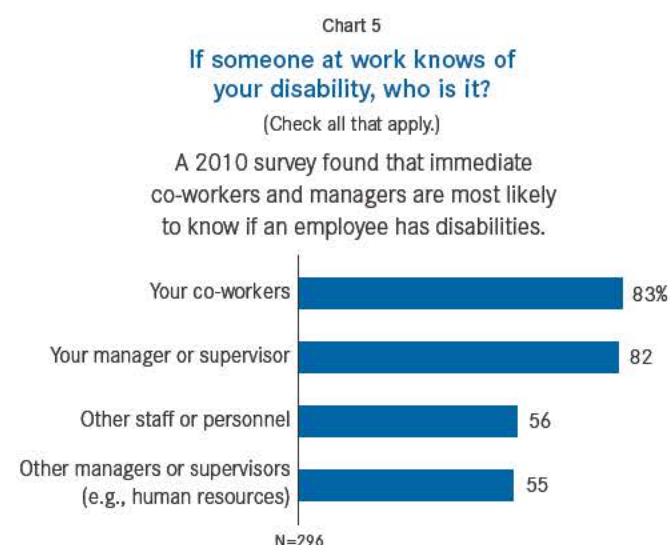
Employees with disabilities who do choose to disclose do so at different points of time along the employment process. In a 2011 survey, respondents whose disabilities are apparent indicated they disclosed their disability earlier in the employment process (Chart 7).[191]

Chart 6

If someone at work knows of your disability, why did you tell them?

(Check all that apply.)

Almost half of the respondents to a 2010 survey said they disclosed because they thought it was important for others to know.

Thought it was important for others to know	49%
Ability to perform essential job duties was negatively affected by disability	33
It is a visible disability	32
Needed an accommodation	21
There was a place to disclose disability on the job application	11
No particular reason — It came up in conversation	24
None of the above	1

N=296

Source: Kessler Foundation Final Report, *The ADA 20 Years Later*, May-June 2010.

Chart 5

If someone at work knows of your disability, who is it?

(Check all that apply.)

A 2010 survey found that immediate co-workers and managers are most likely to know if an employee has disabilities.

Your co-workers	83%
Your manager or supervisor	82
Other staff or personnel	56
Other managers or supervisors (e.g., human resources)	55

N=296

Source: Kessler Foundation Final Report, *The ADA 20 Years Later*, May-June 2010.

Chart 7

If you disclosed your disability to your employer, when did you first disclose it?

Half of the respondents to a 2011 survey with a "very apparent" disability said they disclosed their disability during recruitment.

	During recruitment	During interview	After being hired
Not apparent	42.0%	22.5%	35.5%
Somewhat apparent	35.5	28.2	36.3
Very apparent	50.6	34.1	15.3

■ Not apparent ■ Somewhat apparent ■ Very apparent

Not apparent: N=169. Somewhat apparent: N=125. Very apparent: N=206.

Source: Sarah von Schrader, Valerie Malzer, William Erickson, and Susanne Bruyère, "Emerging Employment Issues for People with Disabilities: Disability Disclosure, Leave as Reasonable Accommodation, Use of Job Applicant Screeners," Cornell University, ILR School, Employment and Disability Institute (digitalcommons.ilr.cornell.edu/edicollect/1288).

Ramifications of disclosure

Disclosure of a disability has consequences for the individuals disclosing, as well as for their organizations, and those consequences are not always advantageous for either party. The fears and concerns of employees with disabilities about disclosing and their desires for confidentiality and protection are realistic. In a report from 2011, 27 percent of those who said their disabilities are either "not apparent" or "somewhat apparent" also said they had experienced longer-term negative consequences from disclosing their status (Chart 8).[192]
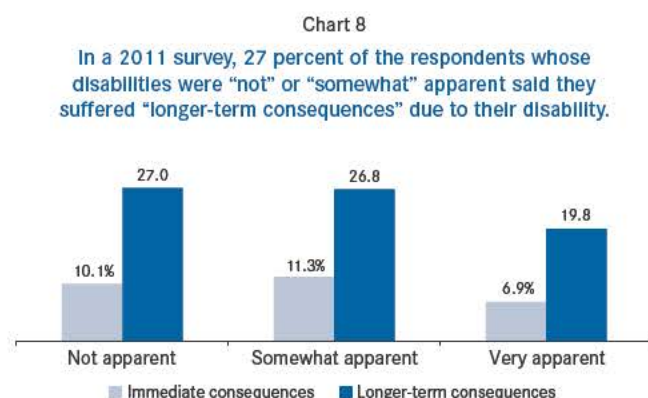
Chart 8

In a 2011 survey, 27 percent of the respondents whose disabilities were "not" or "somewhat" apparent said they suffered "longer-term consequences" due to their disability.

Not apparent: N=169. Somewhat apparent: N=125. Very apparent: N=206.

Source: Sarah von Schrader, Valerie Malzer, William Erickson, and Susanne Bruyère, "Emerging Employment Issues for People with Disabilities: Disability Disclosure, Leave as Reasonable Accommodation, Use of Job Applicant Screeners," Cornell University, ILR School, Employment and Disability Institute (digitalcommons.ilr.cornell.edu/edicollect/1288).

Employers' concerns about disclosure include a legal concern that if they gather information about people with disabilities, those data could be discoverable in a lawsuit and used against the organization. Some legal specialists interviewed by the author have argued against this concept, stating that if information is gathered *and acted upon*, then it will actually provide a defense in a lawsuit. If an organization does not intend to take action on the results of data-gathering or assess the degree of representation of people with disabilities in its workforce, it should not gather the data in the first place. Another common legal concern is that gathering information on disabilities during the hiring process violates federal law. As long as the data are used for affirmative action purposes, such as ensuring that a percentage of candidates interviewed are people with disabilities, and it is kept separate from an individual's personnel file and other records about the individual, then it is not a violation of law. Because of the legal issues raised in the collection of data, it is advisable to have legal counsel involved before taking any action on self-disclosure.

Mapping how and why to disclose

To determine the best collection process, companies must determine the degree of identification required, the best and most minimally invasive process to collect the information, and what purpose is served by the identification of the data (Table 3).

Table 3
Self-disclosure matrix

Degree of identification	Collection process	PURPOSE SERVED FOR:	
		Individual employee	Employer
None	• No proactive collection of disclosure data	• Protect individual confidentiality and privacy	• Presumably reduce legal risks*
Anonymous	• Employee survey • Employee focus groups and interviews conducted by third party • Data collected/kept separately from all other individual information, such as job applications	• Support organizational improvement • Help drive high-level culture or process change	• Gather topline metrics on representation as well as recruitment, hiring, and advancement • Create accountability measures • Improve workforce planning
Individual identified	• Verbal notification by individual • Form with name identified • Data kept in HR or other company data systems (e.g., emergency preparedness database)	• Receive an accommodation • Take advantage of any company career advancement opportunities for people with disabilities • Safety/emergency preparedness • Affirm identity and individual empowerment	• Improve employee performance • Strengthen accountability measures for representation, recruitment, hiring, retention, and advancement • Improve talent development

* Avoidance of data collection is no guarantee of protection from legal risk.

Organizations that wish to protect employee confidentiality and reduce legal risk often do not gather any information on disability status. However, anonymous surveys, especially those gathered by third parties, provide confidentiality and, if systematically acted upon, may actually enhance legal protection.

While individual identity could be revealed by an employee disclosing a disability (e.g., "I, Jane Doe, have type 1 diabetes."), such complete identification is not necessary if the purpose of learning an employee's disability status is simply to tally workforce representation or take systematic action to improve organizational conditions for people with disabilities. Representation and improvement statistics can be computed without requiring full identification. Offering employees a voluntary opportunity to disclose disability status on an anonymous employee engagement survey or other employee survey, for example, would achieve the purpose of gathering representation and improvement data while allowing employees to maintain their anonymity.

When the purpose is to provide a tailored service or benefit for an individual employee, disclosure is often required (e.g., a reasonable accommodation requires disclosure). Nevertheless, employers should do everything possible to maintain confidentiality.

Employees' and employers' fears and reluctance about self-disclosure need to be balanced against the many beneficial purposes served, recognizing that the individual employee and the employer experience different benefits and risks and different kinds of disclosure data can be collected with different degrees of anonymity.

Creating channels for disclosure

Several approaches are available for gathering information on disabilities at the aggregate and individual levels. In situations where employees require support from the organization, need to inform others in the organization about their disability (e.g., when they want colleagues to understand that their physical behavior is caused by a neurological issue and not by drunkenness), require an accommodation, or simply believe that their disability is a part of their identity, employees need to disclose as an individual in a timely manner to the appropriate people.

A useful template for individual disclosure is the U.S. Office of Personnel Management's Standard Form 256 (SF 256), which is typically used to capture demographic data to help federal agencies determine success rates in meeting disability hiring goals (see Appendix III on page 60).[193]

SF 256 distinguishes between specific disabilities as well as between more and less severe disabilities consistent with the ADA and Rehabilitation Act definition of disability.

Inserting the six questions developed by the Census Bureau for the American Community Survey (ACS) in the demographic section of an employee survey allows employers to compare their workforce to Census Bureau disability population data (see box below).[194] These are public-use questions that have been tested with people with disabilities and are easily adapted for use in any employee survey or for internal metrics on self-disclosure. However, these items may miss people with some conditions that companies might be interested in specifically learning about, such as mental health conditions or upper body disabilities. If so, such items can be added to the recommended ACS questions.

A "yes" answer to any of the ACS questions indicates that the respondent has a disability. These questions use the conceptual framework of disability described in the ICF. Using the six ACS questions affords consistency with the ICF and allows benchmarking with data generated by WHO and the ACS. In the United States, Cornell University's Disability Status Reports, which are based on these six questions, may also provide benchmarks.[195]

Information on people with disabilities can also be gathered anonymously through focus groups and interviews. Of course, these avenues are not confidential. In focus groups, it is helpful to obtain agreement at the outset that what is said in the focus group will remain in the focus group. For interviews, a guarantee by the interviewer to maintain confidentiality is usually adequate. Having a third party (e.g., a university or consultant) gather the information can give participants more confidence that confidentiality will be maintained.

Six Questions from the American Community Survey

1 Are you deaf or do you have serious difficulty hearing?

2 Are you blind or do you have serious difficulty seeing even when wearing glasses?

3 Because of a physical, mental, or emotional condition, do you have serious difficulty concentrating, remembering, or making decisions?

4 Do you have serious difficulty walking or climbing stairs?

5 Do you have difficulty dressing or bathing?

6 Because of a physical, mental, or emotional condition, do you have difficulty doing errands alone such as visiting a doctor's office or shopping?

At the time this report was printed, the Office of Federal Contract Compliance (OFCCP), the office within the U.S. Department of Labor that is charged with enforcing affirmative action and equal employment opportunity requirements of those who do business with the federal government, had proposed substantive changes to "the process through which [job] applicants are invited to voluntarily self-identify as individuals with disabilities." These changes, if incorporated in revised regulations, will require a federal contractor to annually and "anonymously survey all of its employees" using a format prescribed by the OFCCP.[196]

For individuals to reveal their disability, they need to trust that the information will not be used against them and that the organization will support them. According to responses to the Cornell University "People with Disabilities" survey, there are many reasons why employees with disabilities have not disclosed their disabilities (Table 4).[197] The most common reason respondents gave were concerns about being fired (78.1 percent) or being treated differently by

supervisors or coworkers (67.5 percent). As seen in Table 5, respondents to the Cornell survey who self-identified said the primary reason for doing so was the "need for an accommodation" (69.9 percent) or because they have an "open and supportive relationship" with their supervisor (65.0 percent).[198]

> **LEADING PRACTICE**
>
> Many people with disabilities are unidentified and most become disabled after being hired. Develop an organizational climate that makes it safe to disclose and provide solid reasons to disclose, such as flexible work options and access to accommodations, facilities, and technology.

Table 4

Reasons why employees with disabilities do not disclose their disability

Factors	Percentage of people with disabilities who rated the factor "very important"
Concern about being fired or not being hired	78.1%
Concern about being treated differently by supervisor/co-workers	67.5
Concern that the employer may focus more on the disability than on actual work performance/abilities	67.0
Fear that opportunities for promotion will be more limited	66.7
Concern about losing or not receiving health care benefits	64.0
Concern that one's supervisor would not be understanding/supportive	63.2
Concern about being viewed differently by supervisor/co-worker	62.6
A belief that the disability does not have an impact on ability to perform the job	56.5
A desire to keep the disability private	42.6

Source: Calculations by Sarah von Schrader, Cornell University, Employment and Disability Institute, using data from Cornell and AAPD's Emerging Employment Issues for People with Disabilities Survey. This table represents the responses of the 116 individuals who disclosed their disability in their current or most recent position. For further information, visit the Cornell website (digitalcommons.ilr.cornell.edu/edicollect/1288).

Table 5

Reasons why employees with disabilities disclose their disability

Factors	Percentage of people with disabilities who rated the factor "very important"
The need for an accommodation to perform a job or to take care of a health condition during working hours	69.9%
An open and supportive relationship with one's supervisor	65.0
Knowing that the employer has made concerted efforts to create a disability inclusive/friendly workplace	56.0
Knowing that the employer is actively recruiting and hiring people with disabilities	49.4
Knowing that other employees had disclosed their disability and were successful in the workplace	48.7
Disability is included in the employer's diversity statement	48.5
The belief that the disclosure will lead to new opportunities for promotion or training (e.g., programs to advance employees who are members of diverse groups)	39.2
A message of disability inclusiveness on the company's website or promotional materials (e.g., pictures of people with disabilities)	36.9
A statement on recruitment materials inviting applicants with disabilities	36.1
An employee with a disability recruiting at job fairs or campus recruitment events	30.7
The existence of a disability employee resource group (affinity group)	23.3

Source: Calculations by Sarah von Schrader, Cornell University, Employment and Disability Institute, using data from Cornell and AAPD's Emerging Employment Issues for People with Disabilities Survey. This table represents the responses of the 473 individuals who disclosed their disability in their current or most recent position. For further information, visit the Cornell website (digitalcommons.ilr.cornell.edu/edicollect/1288).

Creating a workplace where employees feel safe to disclose

The following recommendations for creating a work environment where people with disabilities feel safe to disclose and understand the advantages of disclosure are based on the insights of researchers at the Cornell University Employment and Disability Institute.[199]

- Senior managers should make clear and unequivocal written and verbal statements about the value and desirability of hiring people with disabilities and about ensuring fairness in hiring and career advancement. These communications should be featured on internet sites directed toward prospective employees and intranet sites directed toward current employees. Both should include a diversity statement that specifically addresses people with disabilities.

- Senior managers and others in the organization who have a disability or are a caregiver to a person with a disability and are widely recognized in the organization as having been successful should be encouraged to disclose their status publicly.

- Flexible work arrangement policies and guidelines should encompass people with disabilities.

- Disability awareness training should be provided to all employees. The training should, at a minimum, incorporate basic information on disabilities, legal mandates, etiquette toward people with disabilities, unintended bias, and company policies and practices.

- Training for managers on fair treatment, unbiased evaluation, inclusion of people with disabilities, and their role in accommodations and flexible work arrangements should also be provided.

- Action plans in response to survey and other study results should be distributed throughout the organization.

- A fair system for addressing complaints should be established.

- Managers should be held accountable for creating a work environment in which people with disabilities can thrive and succeed.

- Initiatives to attract, retain, and advance people with disabilities should be publicized inside and outside of the organization.

- One or more ongoing focus groups, composed of people with disabilities, should be used to obtain feedback on the organization's policies, practices, and programs directed at people with disabilities.

Organizational Climate

For employees with disabilities, the routine treatment they receive in the workplace may be one of the greatest determinants of the quality of their work life.[200] The attitudes and the behaviors of colleagues and supervisors can have a profound impact on employees' ability to succeed and advance and on their willingness to disclose their disability. Unfavorable attitudes toward employees with disabilities are among the greatest employment barriers to their success.[201] Moreover, several studies have shown how changing supervisor and coworker attitudes is exceedingly difficult.[202]

Attitudinal barriers

Employees with disabilities face numerous biases about their competence, productivity, and social skills. These biases are often exacerbated by feelings of fear and discomfort from colleagues who have had limited, if any, interaction with people with disabilities. While these attitudes may be unfounded, they nevertheless can result in a reluctance to hire employees with disabilities, as well as the marginalization of those who do make it into the workplace.

In addition, these biases may increase the reluctance of employees to disclose disabilities out of fear that they will be treated differently by their colleagues and supervisors and that their opportunities for professional growth and advancement may be limited as a result. Negative attitudes and unequal treatment of employees with disabilities can sometimes result in a self-fulfilling prophecy: employees with disabilities may respond to such discrimination by becoming alienated and withdrawn and even by decreasing their work effort, confirming the original low expectations others had of them.[203] The following discussion addresses some of the most common attitudinal barriers employees with disabilities face.

Lowered expectations Employers often assume that employees with disabilities cannot achieve the same level and quality of work as their coworkers without disabilities. They may also have concerns that employees with disabilities will be unable to carry out their jobs safely and may, therefore, pose a risk to themselves or others. Employers may also be more likely to question the work ethic of workers with disabilities, as well as their aspirations for career advancement.[204] Discriminatory attitudes may also lead to biased performance evaluations.

Discomfort Coworkers and supervisors may be reluctant to interact with individuals with disabilities or to include them on their work teams because of feelings of discomfort about them or uncertainty about how to approach them.[205] The tendency of some employees to avoid individuals with disabilities such as speech or hearing impairments can make communication more challenging because of the additional strain and time perceived to be involved. While some may avoid interactions with colleagues with disabilities, others may instead respond with a "norm of kindness," which can be perceived as condescending by an employee with a disability.

Stereotypes Feelings of discomfort and unease may stem in great part from lack of previous contact with people with disabilities and reliance on stereotypes. Stereotypes are extremely resistant to change, even in the face of evidence that contradicts them.[206] Once an employee with a disability has been stereotyped, this categorization can take on "master status" and become the dominant lens through which all information about the person is viewed.

Employees with disabilities may encounter an array of stereotypes in the workplace, both positive and negative. For instance, compared with their peers without disabilities, employees with disabilities are more likely to be regarded as quiet, honest, gentle-hearted, nonegotistical, benevolent, saintlike, unaggressive, courageous, and deserving of a break. They are also more likely than their peers to be viewed as hypersensitive, inferior, depressed, distant, shy, unappealing, unsociable, bitter, nervous, insecure, dependent, unhappy, aloof, submissive, helpless, and less capable of competing with others.[207]

Stereotypes and attitudes can also vary based on the nature and severity of the disability. At least one researcher has suggested there is a "hierarchy of disabilities."[208] For example, empirical research suggests that psychological conditions are viewed more negatively than physical disabilities.[209] Misconceptions about people with psychiatric, cognitive, or intellectual disabilities present great obstacles to their employment. These individuals may inspire greater unease, and even fear, in their fellow employees because of a number of common misconceptions (e.g., individuals with mental disabilities are violent).[210]

The time of the onset of a disability can also influence how people with disabilities are perceived. Employers may be more willing to accommodate employees with disabilities who become so while on the job, especially since they are already familiar with the current employee's skills and contributions, than they would be to welcome prospective applicants with disabilities.

In addition, people with disabilities are not a homogeneous group, and stereotypes associated with other dimensions of their identity (e.g., race, gender, sexual orientation, experience, onset of disability, education, etc.) may also influence how they are perceived and, at times, even compound the challenges they face.[211]

Misconceptions about disabilities legislation Employees with disabilities may also encounter resentment and resistance in the workplace due to misconceptions about the requirements of disabilities legislation. For instance, coworkers may assume that individuals with disabilities were hired because of ADA requirements rather than their qualifications and abilities.[212] As a result, they may fear that having employees with disabilities on their team will reduce productivity and result in lower compensation and rewards for everyone. In addition, some employees may perceive accommodations for workers with disabilities as preferential treatment.[213]

Organizational characteristics

Some organizational characteristics may prove particularly unfavorable to employees with disabilities. Bureaucratic organizations and other impersonal environments that value standardization may not possess the flexibility and responsiveness required to ensure a supportive work environment for workers with disabilities.[214] In such environments, for example, it may be more likely that workplace accommodations will be perceived as preferential treatment.

According to a 2009 study, there were no significant differences in feelings about job satisfaction, company loyalty, willingness to work hard, and turnover intention in organizations perceived as "fair" by employees with and without disabilities.[215] Moreover, employees with disabilities in companies that were perceived as having low levels of fairness scored their organizations significantly lower than their nondisabled colleagues. This suggests that employees with disabilities are disproportionately affected by such environments.

Consequences of attitudinal barriers

The attitudinal barriers described above can result in a variety of negative consequences for employees with disabilities and the organizations that employee them.

Fear of self-disclosure Workers may be reluctant to disclose their disabilities for fear that they will be viewed and treated differently by their colleagues and supervisors.[216] They may worry that they will not be hired or that their job security will be threatened.

They may also have concerns about the willingness of other employees to work on the same team, supervise, or be supervised by someone with a disability. The worry that others will focus on their disability rather than on their abilities and actual performance may also inhibit employees with disabilities from self-disclosing. As discussed previously, this lack of self-disclosure may prevent employees with disabilities from receiving the reasonable accommodations they are entitled to, and it may prevent employers from developing improved strategies for supporting workers with disabilities.

LEADING PRACTICE

Train all employees on etiquette and understanding. Reduce fears of interacting with people with disabilities. Ensure managers are aware of their role in leveling the playing field, especially their role in eliminating unintended biases and micro-inequities; know how to interview objectively, how to be inclusive in word and deed, and what their role is in the accommodations process; and fully understand their accountabilities and legal responsibilities.

Isolation and lack of integration Because of the biased attitudes of colleagues and supervisors, employees with disabilities often find themselves excluded from the informal organizational networks and natural workplace supports that can lead to integration and advancement in the workplace.[217] Such limited interaction not only results in social isolation and lower engagement for employees with disabilities, but it also creates a missed opportunity for raising awareness among coworkers and supervisors. Increased interaction between people with and without disabilities can help remove negative stereotypes held by workers without disabilities.[218]

Limited development and advancement Due to their isolation, individuals with disabilities often receive less informal training and mentoring from their coworkers and supervisors, an important source of learning that is also critical to career advancement.[219] Isolation can also lead to restricted information about advancement opportunities.

Less responsibility and authority Discriminatory attitudes also contribute to the fact that employees with disabilities are less likely to hold supervisory positions, and they are more likely to be closely supervised than their nondisabled peers.[220] Employees with disabilities are overrepresented in entry-level and unskilled jobs, which may place them at greater risk for job loss, lower wages, and limited skill development and career prospects.

Addressing attitudinal barriers

There are a number of practices companies employ to improve the climate for employees with disabilities.

Assess organizational climate for disability In order to better address the barriers facing employees with disabilities and determine appropriate interventions, companies should use surveys, interviews, focus groups, and other tools to gauge the attitudes and experiences of workers with and without disabilities.[221]

Foster formal and informal opportunities for interaction As previously noted, increased contact between individuals with and without disabilities can reduce stereotypes and the discomfort felt by those without disabilities. By actively promoting both formal (e.g., job assignments) and informal opportunities (e.g., social activities for interaction between employees with and without disabilities), organizations can foster improved relations and a more supportive and inclusive work climate.[222] Team building and process consultation can also serve as useful strategies for strengthening communication and relationships between employees with and without disabilities.[223] Greater contact with people with disabilities, especially those in higher-status positions, helps dispel negative stereotypes among nondisabled workers.[224]

Volunteering in the community Interacting with people with disabilities outside the workplace through volunteer efforts can temper biases held by employees without disabilities.[225] It can also provide the organization with an opportunity to forge important connections with the disability community. Serving on the boards of organizations that help people with disabilities provides networking opportunities to identify job candidates with disabilities.

Training Providing dedicated education and training on disabilities to the workforce can help foster a more supportive and welcoming environment for employees with disabilities. Training should extend to all levels of the organization, including human resources personnel, front-line supervisors, senior management, workers, and recruiters. Currently, training is typically offered to only one or a few of these groups in most organizations, and, even then, most training is completed on a voluntary basis. Companies may need to make training mandatory for it to be most effective.[226]

Disability-related Training Programs

Here are some of the most widely offered training programs used to educate all employees about the rights, needs, and contributions of employees with disabilities.

Strategic awareness This program, which is usually offered to the diversity council and senior management team, includes:

- Current state analysis and feedback on any relevant internal data on people with disabilities from interviews, focus groups, and employee surveys.
- The strategic process for responding to the data, including elements of strategy and best and next practices.
- The roles and responsibilities of senior management, including internal communications, resourcing, and the time commitment required.

Business case Typically offered to all employees and presented by senior management, this briefing examines:

- The current state of hiring of people with disabilities, including representation of people with disabilities and disability-specific results on organizational assessments and surveys.
- The elements of the business case for hiring people with disabilities that are specific to the organization.
- The actions the organization will take to advance the business case.

Disability legislation and nondiscrimination Managers, supervisors, and HR staff most often communicate this approach, which includes:

- A discussion of relevant employment legislation and civil rights laws (e.g., ADA, Architectural Barriers Act, Rehabilitation Act, Title VII of the Civil Rights Act).
- A description of the relationship of the ADA to other state and federal employment and nondiscrimination laws.
- Information on the confidentiality requirements of medical information.
- Definitions of essential job functions.
- The elements of nondiscriminatory recruitment, interviewing, and hiring practices.
- The accommodation process, including negotiation and conflict management.
- Career equity and promotional considerations for persons with disabilities.
- How to conduct nondiscriminatory performance appraisals and terminations.

Disability awareness and etiquette[227] This training, which is usually offered to all employees, covers:

- How conscious and unconscious biases influence behavior.
- Steps for how to dispel stereotypes about people with disabilities and replace those mistaken notions with more accurate information.

- Information about the diversity among people with disabilities and of the experiences of individuals with those disabilities.
- The strengths and contributions of employees with disabilities to the organization.
- Etiquette in interacting and working with people with disabilities.
- Information on post-traumatic stress disorder, traumatic brain injuries, and depression.

Experiential learning These experiences are also typically targeted to all staff.

- Role play to better understand and empathize with the obstacles regularly encountered by employees with disabilities (e.g., use a wheelchair for a day).[228]
- This type of outreach is typically offered only after some foundational awareness and etiquette training has been completed.
- Because it allows people without disabilities to experience a disability from which they can walk away at the end of the exercise, experiential learning can be controversial and should be carefully managed.

Planning for Strategic Change

The change strategy planning matrix shown in Table 6 is designed to foster critical and strategic change practices: integrate program initiatives, engage stakeholders, build success and momentum early on, and encourage longer-term thinking in phases.

Table 6
Change strategy planning matrix

Strategic variable	Phase 1 Build Momentum Start to 6 months	Phase 2 Deepen Understanding 7 to 18 months	Phase 3 Institutional Gains 19 to 30 months
Top management commitment			
Communications			
Implementation infrastructure			
Employment process			
Measurement and self-disclosure			
Organizational climate			
Stakeholder engagement			

In addition to what is illustrated in the change strategy planning matrix, a diversity or disability strategy should follow Ludwig Mies van der Rohe's counsel of "Less is more." A strategy should focus on a few critical strategic objectives in each phase. Those in charge of implementing the strategy should be concerned about where strategic variables fit in the matrix because strategic objectives may overlap several strategic variables. For example, an assessment of organizational climate could fit in measurement and self-disclosure, organizational climate, or stakeholder engagement. Such overlap is actually good because it allows the change strategy to advance on three fronts.

A real danger in developing an initiative to employ people with disabilities is that the initiative becomes a "program of the month" rather than a strategic endeavor. The sum of programs over time must touch on and advance all the strategic variables, although not necessarily at the same time (Table 7).

Table 7

Example of change strategy planning matrix

Strategic variable	Phase 1 **Build Momentum** Start to 6 months	Phase 2 **Deepen Understanding** 7 to 18 months	Phase 3 **Institutional Gains** 19 to 30 months
Top management commitment	• Senior management team conducts a series of town meetings to engage employees and understand their needs and concerns • Draft business case	• Finalize business case and communicate	• Seek external recognition and rewards
Communications	• Announce diversity and inclusion initiative to organization	• Announce results of assessment and steps to be taken to address findings • Communicate business case	• Communicate results externally
Implementation infrastructure	• Put one person in charge of employing people with disabilities • Establish ERG for people with disabilities		
Employment process	• Establish employee resource groups	• Implement peer mentoring program through ERGs • Put accountabilities in performance plans • Implement flexible work guidelines and policies for people with disabilities	• Implement leadership development through ERG's • Implement full, centralized mentoring initiative • Train managers in interviewing, onboarding, and evaluating employees with disabilities
Measurement and self-disclosure	• Establish scorecard goals • Administer employee survey with select disability questions	• Put measures in every managers' performance plan	• Acknowledge achievement of goals in promotions, rewards, and recognition
Organizational climate	• Clarify diversity values and beliefs • Assess organizational climate through focus groups and interviews and feed back to senior management	• Recognition of successful employees with disabilities • Establish volunteer opportunities with agencies serving people with severe disabilities	• Ongoing increases in number of people willing to disclose
Stakeholder engagement	• See TMC above • Revise plan based on input from assessment and town meetings • Obtain middle management input on business case	• Senior management reviews and approves strategy • Establish ongoing focus groups of people with disabilities • Communicate business case to middle management	• Senior management reviews and approves revised strategy • Senior management reviews results quarterly

In the early stages, top management commitment, implementation infrastructure, stakeholder engagement, and measurement in the form of an organizational assessment are critical. The assessment can often be the "burning platform" that causes leaders to commit and take action. Communication is vital in every phase. The employment process and activities to advance the organizational climate will tend to accelerate in the second phase.

The strategy should look more than one year ahead to foster strategic thinking. The names and length of phases should be left up to the unique characteristics and issues of each organization. The first phase should be relatively short—three to six months—to obtain some early wins and build momentum.

Two Unique Populations: Caregivers and Veterans with Disabilities

Caregivers

Employers should also carefully consider the needs of caregivers in designing disability efforts. Many employees must juggle work responsibilities with responsibility for family members with disabilities, including directly providing and managing their care and paying for it. In a 2008 study, nearly 25 percent of families had at least one member with a disability, and 7 percent of families with children include a child with a disability.[229] Most people who provided care to individuals with a disability were employed. While primary caregivers are disproportionately women, particularly women of color, men are increasingly taking on this role.[230]

Many people associate the ADA solely with protections for individuals with disabilities. The legislation's protection also extends to employees associated with persons with disabilities, including relatives and nonrelatives. Specifically, the ADA prohibits discrimination against caregivers in the workplace based on stereotypical assumptions that they are less able or not as committed to carrying out job duties due to their caregiving responsibilities.[231] In addition, other state and federal laws, such as the Family and Medical Leave Act (FMLA) and Title VII of the Civil Rights Act of 1964, provide protections for caregivers.

Caregiving can place physical strain, emotional stress, and financial hardship on workers.[232] In a survey conducted by the National Alliance for Caregiving in 2009, 73 percent of caregivers had worked at some point during caregiving, and 58 percent of caregivers said they were currently employed.[233]

Almost two-thirds (65 percent) of caregivers in a 2007 study reported increased stress or anxiety due to caregiving, 37 percent reported feeling depressed or hopeless, 49 percent reported difficulty sleeping, and 26 percent reported new or worsening health problems due to caregiving.[234] In the National Alliance for Caregiving 2009 survey, 69 percent of those who provided caregiving reported they received a work accommodation, such as a leave of absence, flexible work hours, or reduced work hours.[235] In the 2004 edition of the National Alliance of Caregivers survey, 57 percent of caregivers said they "have to go in late, leave early, or take time off"; 17 percent said they "have to take a leave of absence"; 10 percent said they would "have to go from full time to part time"; and 6 percent indicated they would "have to give up work entirely."[236]

Although these survey results indicate there can be some costs related to employing caregivers, employers willing to support caregivers are able to retain skilled, experienced employees and guard against the possibility that caregivers themselves will join the ranks of workers with chronic illnesses and disabilities. There are a range of best practices that employers can use to support workers who have caregiving responsibilities:

- Establish an employee resource group for caregivers or, better yet, include caregivers in resource groups for employees with disabilities.
- Offer a full range of flexible work alternatives.
- Provide personal or sick leave that allows employees to engage in caregiving.
- Establish leave donation banks that enable employees to voluntarily contribute their leave to coworkers.
- Provide wellness programs—stress-reduction seminars, relaxation techniques, and massage therapy—and encourage caregivers to participate in them.
- Offer financial incentives to encourage participation in preventive benefits, such as premium reductions for those who obtain annual physicals or join a health club.
- Offer supplemental dependent care coverage to reimburse costs for in-home care or adult day care and cover therapeutic counseling and support services for the caregiver.
- Provide resource and referral services about available disability-related services and caregiving (e.g., the Exceptional Caregiving website developed by the American Business Collaboration for Quality Dependent Care).
- Offer lunchtime information sessions on caregiving-related topics.
- Make arrangements with local community groups or hospitals so that employees can attend support groups.
- Invite employees to share real-life stories on how they successfully manage work and family challenges for inclusion on the company intranet site.

The workplace supports most frequently used by care givers—flextime, leaves of absence, and part-time work—require no cash outlays on the part of the employer and can even result in long-term savings, reduced turnover, and more satisfied employees who are able to perform at higher levels.[237]

Training on disability legislation and nondiscrimination should address the compliance issues pertaining to caregivers. Preparing management staff is particularly important because they are usually the most involved in recruiting, assignments, scheduling, leave approval, performance reviews, discipline, and promotions.

Veterans with disabilities

While there are currently 5.5 million veterans of working age diagnosed with disabilities, the real rate of disability is believed to be higher due to underdiagnosis and underreporting.[238] It is also believed that the incidence of nonvisible disabilities is higher than that of visible disabilities. For those veterans returning from deployment in Afghanistan and Iraq, about one-third report symptoms of at least one of the three "signature disabilities": posttraumatic stress disorder (PTSD), traumatic brain injury (TBI), and depression. About 5 percent report symptoms of all three.[239]

It should be noted that the term "PTSD" is falling out of favor among some people, especially with the military.[240] While it remains the official nomenclature of the American Psychiatric Association, many believe that it is not a disorder at all, but a normal response to trauma. Therefore, it is increasingly referred to as post traumatic stress (PTS), leaving out the "D." Because all of the research studies that have been referenced in this report use the PTSD term, it has been used for consistency.

Veterans with disabilities in the workplace In August 2009, veterans with service-related disabilities had an employment rate of 70.7 percent; the rate was 81.9 percent for veterans without a service-related disability.[241] "In 2009," according to the U.S. Bureau of Labor Statistics, "the employment rate of working-age people without disabilities in the United States was 76.8 percent."[242]

Due to their military background, veterans bring some valuable capabilities to the workplace. These include practical skills and training that can transfer to civilian life—discipline and the ability to work as part of a team, and special training and employment supports that veterans receive in return for their service.[243]

Veterans may also have some of the following tendencies that make it more difficult for them to become knowledgeable about and receive the full benefits of the disability supports to which they are entitled:

- They may not self-identify as a person with a disability because they consider themselves veterans first and foremost.

- Veterans may also be reluctant to disclose their disabilities, especially those related to mental health and cognitive functioning.

- Even when veterans are aware that they are entitled to accommodations, they may view them as a sign of weakness or as a "special favor."[244]

Signature disabilities (PTSD, TBI, and depression)

Veterans returning from Afghanistan and Iraq are unique from previous eras of veterans in several ways:[245]

- They have had extended tours of duty and multiple deployments, often without the full recommended rest periods between assignments.

- Many of them are members of the National Guard and Reserves. As a result, they do not have the traditional support network that active duty soldiers have (e.g., their spouses and children are not tied into the social and other supports provided on military bases).

- They are more prone to TBI because of the nature of combat and weaponry in these wars, including roadside bombs and mortar attacks. These have resulted in blast injuries, which are more difficult to understand and diagnose than other types of brain injuries.

Because head injuries such as TBI and psychological conditions such as PTSD are highly stigmatized and unfamiliar to many people, some employers may be hesitant to employ veterans who have been diagnosed with them. In general, employers often find it easier to understand and accept visible disabilities than nonvisible disabilities.

Table 8
Misunderstanding of "signature disabilities" among human resource professionals

Myths about signature disabilities	Strongly disagree/ disagree	Misconceptions of HR professionals:	
		Strongly agree/ agree	Don't know
It is costly to accommodate workers with disabilities such as PTSD or TBI.	35%	14%	52%
Most workers with TBI will need assistance with work tasks that involve reading.	14	15	70
Workers with PTSD are more likely than others to commit acts of violence in the workplace.	39	8	53

Source: "Recruiting Veterans with Disabilities: Perceptions in the Workplace," Society for Human Resource Management and Employment and Disability Institute, Cornell University Poll, 2011 (www.shrm.org/research/surveyfindings/articles/pages/recruitingdisabledvets.aspx).

According to Cornell University employer-based polls from 2011, human resources professionals often exhibit mistaken impressions about PTSD and TBI (Table 8).[246]

To prevent misunderstanding, the first order of business for organizations is to improve their knowledge of the nature of "signature disabilities" and how those disabilities affect the workplace. It is important to note that both veterans and civilians experience PTSD, TBI, and depression.[247] PTSD can be brought on not only by combat but also by other life-threatening events, such as car accidents, witnessing the death of loved ones, natural disasters, and assaults. TBI can be something as common as a concussion, which is also regularly experienced by athletes. Many civilians have difficulties with depression.

Employers should take special considerations into account regarding PTSD and TBI:[248]

- These conditions may be undiagnosed or underdiagnosed, so they may unfold over time.

- These conditions may also change over time, requiring flexibility in accommodations.

- Symptoms can be subtle and vary significantly by individual; there is no "one size fits all" solution.

Post-traumatic stress disorder (PTSD) PTSD is an anxiety disorder that develops in response to a traumatic event.[249] Symptoms of PTSD include reexperiencing symptoms in the form of flashbacks and nightmares; avoidance symptoms in the form of withdrawal, emotional numbing, and loss of interest in life activities; and hyperarousal symptoms in the form of hypervigilance, an exaggerated startle response, irritability, sleep problems, and difficulty concentrating. PTSD symptoms usually emerge within the first few months of the traumatic event but can also emerge many months or years after.

Some of the symptoms of PTSD that can affect performance in the workplace include memory deficits, difficulty sustaining concentration, disorganization, and poor sleep patterns.[250] The website of the America's Heroes at Work program recommends the following strategies in partnership with the employee for accommodating those with PTSD:[251]

- Flexible work schedules and/or job sharing with another employee.

- Schedule reminders (telephone, pagers, alarm clocks).

- Scheduled rest breaks to prevent stimulus overload and fatigue.

- Work task checklists and memory aids.

- Time management tools.

- Job coaches who make frequent, scheduled site visits.

- The installation of white noise or environmental sound machines to eliminate distractions.

- Access to mentoring by a coworker or a retired worker.

- An understanding that PTSD and symptoms of any psychological condition may ebb and flow, and that the person may experience good days and others that are more challenging.

- Support for pursuing treatment and assistance, even during work hours.

Dr. Eileen Lynch, a psychologist with Readjustment Counseling Services of the Veterans Health Administration, predominantly sees veterans with PTSD. She observes that they tend to share a number of characteristics that make them good workers: an excellent work ethic, promptness, and pride in doing an excellent job. They are also loyal to their employers, tend not to believe they are entitled to special privileges, and will go above and beyond for their organizations when their organizations stretch for them. Even those who are more severely impaired will often do well with a little flexibility.

Traumatic brain injury (TBI) A TBI is defined as a blow or jolt to the head or a penetrating head injury that disrupts the function of the brain.[252] The severity of such an injury may range from mild (e.g., a concussion) to severe (e.g., extended periods of unconsciousness or amnesia). Some of the symptoms of TBI that can affect performance in the workplace include a shorter attention span, short-term memory difficulties, organizational challenges, headaches, and mental fatigue.[253] The America's Heroes at Work program recommends a number of strategies to help partner with those with TBI, many of which are similar to those for employees with PTSD.[254] The degree to which an individual will need any or all of these supports will vary based on his or her particular set of symptoms and desires.

Recruiting and hiring veterans with disabilities

According to an SHRM study, a substantial majority of human resources professionals had never heard of top organizations that assist employers in finding qualified veterans with disabilities, such as the Wounded Warrior Project. Less than 50 percent of companies have used recruitment resources to target veterans with disabilities. Waste Management, a company with a strong track record for hiring veterans, has established a number of partnerships in its aggressive bid to attract veterans with disabilities (see box).

Employers can take some of the following steps recommended by the EEOC to recruit and hire veterans with disabilities:[255]

- Stating on job advertisements or vacancy announcements that individuals with disabilities, including veterans with service-connected disabilities, are encouraged to apply.

- Ensuring that online hiring and application processes are accessible to applicants who have service-connected disabilities.

- Making written recruiting materials available in alternate formats.

- Sending vacancy announcements to and asking for referrals from government, community, military organizations, and One-Stop Career Centers that train and/or support veterans with service-connected disabilities.

- Posting advertisements and vacancy announcements in publications for veterans.

- Attending job fairs and using online resume databases that connect job-seeking veterans with civilian employers.

In reaching out to veterans with disabilities, it is vital to understand their attitudes toward the civilian workplace.

In a survey of veterans, most of whom identified themselves as having a disability, the majority expressed fear that they would be discriminated against in hiring. They often possessed limited knowledge of their disability-related rights, including disclosure and accommodations, and the vast majority of respondents indicated they were unlikely or somewhat unlikely to disclose their disability during hiring or employment.[256]

RESOURCES
Hiring Veterans with Disabilities

Waste Management is a leader in hiring veterans, as evidenced by its place on both military.com's "Best Veteran Employers" and *G.I. Job's* "Top 100 Military Friendly Employers" lists. Here are the "go to" resources that Waste Management uses to recruit disabled veterans. Potential users of these services should be warned that some of these sites are not sophisticated in reaching out to businesses. Persistence, however, will yield rewards.

- U.S. Chamber of Commerce – "Hiring Our Heroes" Hiring Fairs (www.uschamber.com/hiringourheroes). Consult the "Events" page for a list of upcoming fairs (www.uschamber.com/hiringourheroes/events).

- Veterans' Employment and Training Service (VETS) of the U.S. Department of Labor, in particular the service's Disabled Veterans' Outreach Program (DVOP) and Local Veterans' Employment Representative (LVER). Consult the DOL website for regional and state VETS staff locations (www.dol.gov/vets/aboutvets/contacts/main. htm#RegionalStateDirectory).

- Wounded Warrior Initiatives
  - Army Wounded Warrior (AW2) (wtc.army.mil/soldier/ privateemployers.html)
  - Marines Wounded Warrior Regiment (www.wounded-warriorregiment.org)
  - Navy Warrior Care (www.navy.mil/navydata/wounded-warrior.html)
  - Air Force Wounded Warrior (AFW2) (www.wounded-warrior.af.mil/employment)

- Hire Heroes USA Job postings (www.hireheroesusa. org/images/stories/Sponsorship/hire-heroes-usa-sponsorship-opportunities.pdf)

- Wounded Warrior Project (www.woundedwarriorproject.org/)

- Military.com offers job postings and resumes and job fairs (www.military.com/Careers/EmployerPage/ 0,14544,,00.html)

- G.I. Jobs magazine offers classified ads and job fairs (www.gijobs.com)

The Global Landscape

Disability laws, regulations, and policies vary widely across the globe. Two issues of immediate significance for global employers are the United Nations Convention on the Rights of Persons with Disabilities and the growing use of quotas and levies associated with hiring people with disabilities in some countries.

The UN Convention on the Rights of Persons with Disabilities

The purpose of the UN Convention is to "promote, protect and ensure the full and equal enjoyment of all human rights and fundamental freedoms by all persons with disabilities, and to promote respect for their inherent dignity."[257] The convention defines people with disabilities as "those who have long-term physical, mental, intellectual, or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others."[258]

As of August 2012, the convention had been ratified by 119 countries and regional entities. A country that ratifies the convention commits "to develop and carry out policies, laws and administrative measures for securing the rights recognized in the Convention and abolish laws, regulations, customs and practices that constitute discrimination."[259] In addition to the convention, there is an "optional protocol" that 63 countries have approved. The optional protocol provides for communications from individuals claiming to be victims of a violation of the provisions of the convention when all domestic remedies have been exhausted. It also provides for investigative inquiries, conducted by the UN Committee on the Rights of Persons with Disabilities with the permission of the nation involved, following the receipt of information indicating grave and systemic violations of the convention.[260]

The convention has been approved by most of Europe, including the United Kingdom, Germany, and France; China; India; Canada; Mexico; and most of Latin America.[261] On December 4, 2012, the United States Senate, which must approve international treaties, voted against ratification of the convention, although advocates will continue to press the Senate for ratification.[262] The Rehabilitation Act and the ADA provide comparable or greater protections in the United States.[263]

Of particular importance to employers are the following provisions of the convention:

- **Nondiscrimination** This covers both people with disabilities who enter employment and people with disabilities who become so while employed.

- **Equality of opportunity** Elements of this provision include opportunities for employment and advancement, pay, and protection from harassment and accessibility.

- **Accessibility** Companies should bear in mind that this applies to both physical access and information and communication accessibility. In terms of the convention, employers should ask themselves three accessibility questions: [264]

    ○ Are our human resource policies and practices accessible?

    ○ Are our information and communications systems accessible?

    ○ Are our physical facilities accessible?

Employment Quotas and Levies

During dialogues conducted by the research working group, several members noted that their organizations or organizations with which they were familiar were paying fines in some countries for not meeting quotas for employing people with disabilities. Quota systems, a concept that originated in Europe, are designed to ensure that a designated proportion of those employed are people with disabilities. Quotas are typically set by size of employer and may vary by industry, depending on the employability of people with disabilities in that industry.[265] France has a 6 percent quota for workers with disabilities in firms with 20 employees or more. Turkey has a 3 percent quota for employers of more than 50, although it pays full social security for all workers with disabilities up to the quota and 50 percent thereafter.[266]

Under quota-levy systems, employers are subject to fines for not meeting quotas. The intent of these systems is positive rather than punitive. The basic premise is that organizations have a social obligation to employ people with disabilities and, if they do not meet that obligation, they should contribute something to the support of people with disabilities. Most often, quota-levy systems either use the funds collected to improve employment conditions for people with disabilities—through investments in education and training, rehabilitation, and transportation—or redistribute the funds to businesses that employ people with disabilities to assist with accommodations, accessibility, awareness training, etc.[267]

In China, quotas are established by provincial governments, regional authorities, or municipalities. Levies are based on a formula of the targeted quota of people with disabilities minus actual numbers of employees with disabilities times the average annual wage. The funds are distributed in the following manner: 50 percent to rehabilitation services, 20 percent to employers who hire more workers with disabilities than legally required, 20 percent to subsidies for "collectively owned enterprises of disabled employees," and 10 percent to the agency that administers employment services.[268]

Every employer in Germany with 16 or more employees is required to fill 6 percent of its positions with people with disabilities. Some exemptions are made for part-time and contract workers. For each position below the quota, employers are required to pay a monthly levy. The levy revenues are split almost equally between the federal government and the Länder (German provinces or states). The federal government expends its funds to integrate people with the most severe disabilities into occupations. The Länder spend their revenues on regional tasks and individual and employer benefits.[269]

The levies paid by employers abroad are often not visible on financial reports. Some RWG members reported that levies being paid are substantial. Employers in large global companies should determine the worldwide costs of levies. They may find that more aggressive and consistent employment policies and practices could save money and, at the same time, bring larger numbers of people with disabilities into the workforce.

The Future of Employment of People with Disabilities

A number of trends will affect the future environment for people with disabilities in the United States and around the world.

Increased Representation in the Talent Pool

Given the strong relationship between age and disability (Chart 1 on page 10), the number of people with disabilities will increase. Moreover, technological advances will continue to open more doors for people with disabilities. On the other hand, the withdrawal of troops from Iraq and Afghanistan will lead to a decrease of the number of new veterans with disabilities, and improvements in health care will reduce the prevalence of disabilities. Given these dynamic forces, employers should prepare for an increase in the number of people with disabilities in the working population.

Greater Motivation to Hire

Existing and proposed hiring quotas for federal agencies and contractors and financial incentives and subsidies will encourage employers in the United States to hire people with disabilities. Many U.S. companies that are hiring more workers abroad than at home will be more likely to emphasize hiring people with disabilities abroad, especially once they discover the size of the levies they are currently paying or will need to pay. For example, according to a 2012 *Wall Street Journal* analysis, 35 large U.S. multinational companies with 50,000 or more employees who report hiring in both the United States and abroad, "added foreign jobs at three times the rate they added domestic jobs" between 2009 and 2011.[270]

Improved Access and Universal Design

New technologies that make remote work easier and improve the capacity of some people with disabilities to work, as well as better access to existing information and communications technologies stimulated by Section 508 of the Rehabilitation Act, should improve overall access. Increasing public use of universal design will also improve access (see the Walgreens case study on page 62). The trend toward decentralization of the workplace, coupled with the rising acceptance and acknowledgement of the economic benefits of working from home, will increasingly open access for people with disabilities who currently face inadequate transportation systems or limited ability to travel. [271]

If these innovations are to really help people with disabilities, the prevailing attitudes toward people with disabilities need to change. A useful analogy can be found in a comparison of a leading American and a leading Japanese auto plant during the "total quality" heyday of the mid-1980s. The production system in the American plant was filled with robotics, and workers needed to adjust to the robotics personally or through "assistive technologies" that dominated the production process. In the Japanese plant, there were fewer robots and organizations paid much more attention to integrating workers into the production system and increasing inter-action between worker and workplace. This emphasis allowed Japanese plants to create automobiles faster and with higher quality.

The practice of universal design focuses on designing products and production processes "to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design."[272] Products and production processes are designed to work for the widest practical range of individual differences. Universal design conceives of individual differences as a continuum of required ability rather than a dichotomy between people with disabilities and "able-bodied" people. Since all human abilities are distributed over a continuum, this approach, assuming it does not sacrifice productivity, safety, or quality, is preferable. Although there is some evidence that universal design may yield superior results in all these areas, more research is needed.

Organizations can contribute to this research by running small experiments in the design of work and work processes that follow the seven principles of universal design (Table 9) and evaluating the results against similar work and work processes that are not universally designed. The potential for normalizing work and improving productivity, safety, and quality holds great promise.

Table 9
Universal design principles

Principle	Definition
Equitable use	The greatest number of individuals can do the work.
Flexibility in use	The work "design accommodates a wide range of individual differences and abilities."
Simple, intuitive use	How to do the work is "easy to understand, regardless of a user's experience, knowledge, language skills, or current concentration level."
Perceptible information	The greatest number of individuals can do the work.
Tolerance for error	The work "design accommodates a wide range of individual differences and abilities."
Low physical effort	How to do the work is "easy to understand, regardless of a user's experience, knowledge, language skills, or current concentration level."
Size and space for approach and use	How to do the work is "easy to understand, regardless of a user's experience, knowledge, language skills, or current concentration level."

Source: "Universal Design Definition and Principles," Center for Universal Design, College of Design, North Carolina State University, 2007 (livableforalifetime.org/pdf/Universal%20Design%20Principles.pdf).

Next Steps

In the course of this comprehensive review of employer-related research on people with disabilities, a number of important questions have been raised that remain unanswered. Even highly motivated employers report they lack the tools they need to answer these questions and, thereby, successfully employ people with disabilities. By investigating how their organizations should respond to the questions outlined below, companies can make even greater progress in leveling the playing field for people with disabilities.

Outstanding Questions

- Are people with disabilities more resilient, persistent, ingenious, or otherwise more effective employees than people without disabilities?

- Does the addition of people with disabilities improve group problem solving and decision making?

- What are the transportation needs of people with disabilities and the major barriers to transporting them to and from work? How can these needs be met and barriers be overcome?

- Does universal design improve overall productivity, safety, and quality? Are the full costs (build + operate) of universal design more or less than standard approaches to design? How can the principles of universal design be better applied and encouraged?

- What initiatives to advance the employment of people with disabilities have the greatest impact on organizational outcomes, especially employee engagement?

- Do senior managers and human resource leaders believe the business case for hiring people with disabilities has been made? If not, why not?

- What are the purchasing habits of people with disabilities? What are their spending patterns on consumer goods and services that are unrelated to their disability? What are the spending patterns of their family and friends? What influences the spending of people with disabilities and their family and friends? What is the spending on disability-related purchases, including transportation, adaptive tools and technologies, and services? To what degree do people with disabilities influence procurement decisions?

- What support, services, and initiatives provide the greatest opportunity to both advance people with disabilities in employment and benefit the business interests of the employer?

Needed Tools and Resources

Effectively employing people with disabilities is fundamentally about eliminating bias in employment decision making, responding to individual differences, and using the full capabilities of people with disabilities. To meet these goals, companies need the following:

- A readiness audit with benchmarks

- A facilities audit tool to meet and exceed ADA requirements

- A catalogue of disability-owned enterprises

- Model guidelines for flexible work arrangements for people with disabilities

- A "country almanac" with disabilities laws, policies, and regulations; employment barriers quotas and levies; and cultural considerations related to the employment of people with disabilities

- Career self-management methods and tools

- An understanding of effective methods and leading practices for recruiting, including a catalogue of recruiters and recruiting aids

- Effective methods and leading practices for onboarding

Companies also need to guard against bias in employment decisions, which is a critical cause of the tilted playing field for people with disabilities and can be intended or unintended. Unconscious or unintended biases allow humans to process and categorize information and, therefore, are at the root of perception, learning, and meaning, which means they are often difficult to dispel. Bias can be meaningfully reduced by adoption of a number of practices: educating employees about bias; reviewing employment decisions; standardizing hiring, evaluation, and advancement decision processes; establishing objective criteria for employment decisions; and allowing ample time for employment decisions. Ensuring that employment decisions are based solely or to the greatest degree possible on merit helps all protected classes and all high performing employees.

Competing in a global knowledge economy, which is critical to the future of the United States and European economies, is all about responding to individual differences and fully using the capabilities of employees.[273]

The knowledge-based economy is more and more dependent on attracting and retaining educated and experienced workers who demand that employers acknowledge individual differences related to how, when, and where they accomplish their work. The millennial generation—the future of the workforce—makes similar demands. Competitive advantage requires that companies fully engage their human capital capabilities to provide the highest level of productivity possible.

Hiring people with disabilities and building the organizational competence needed to manage their differences and fully engage their capabilities can provide the foundation for managing the knowledge workforce of the future. Effectively employing people with disabilities is really a metaphor for maximizing the performance of all employees and, ultimately, the performance of the organization as a whole.

Financial Incentives to Employers

1. Work Opportunity Tax Credit (WOTC)

Authorized through December 31, 2011, by the Tax Relief Unemployment Insurance Reauthorization and Creation Act of 2010 (P.L. 111-312) and incorporating the Welfare-to-Work Tax Credit, the WOTC provides tax credits for new hires in nine categories, including veterans with service-connected disabilities, referrals from state vocational rehabilitation agencies, and SSI recipients.

The Work Opportunity Tax Credit can now be as much as $2,400, generally, for each new adult hire and $1,200 for each summer youth hire.

The recent Veterans Opportunity to Work (VOW) to Hire Heroes Act of 2011 provides a tax credit of up to $9,600 for for-profit organizations and up to $6,240 for qualified tax-exempt organizations that hire unemployed veterans.

Legislative authority for WOTC target groups that are not veterans expired on December 31, 2011. Reauthorization is expected. However, as of the fall of 2012, reauthorization has not occurred.[274]

Source: "The Work Opportunity Tax Credit (WOTC): An Employer-Friendly Benefit for Hiring Job Seekers Most in Need of Employment," Employment and Training Administration, US Department of Labor (www.doleta.gov/business/incentives/opptax/PDF/WOTC_Fact_Sheet.pdf).

2. Vocational Rehabilitation and Employment Program

The Department of Veterans Affairs Veterans Benefits Administration's Vocational Rehabilitation and Employment (VR&E) Program is a national employment resource for employers. The VR&E service provides vocational rehabilitation services to veterans with service-connected disabilities, enabling veterans with disabilities to transition from military service to rehabilitation and on to suitable employment after military service.

On-the-job training program

An employer hires a veteran at an apprentice wage, and the VR&E supplements the salary up to the journeyman wage (up to maximum allowable under OJT). As the veteran progresses through training, the employer begins to pay more of the salary until the veteran reaches journeyman level and the employer is paying the entire salary.

VR&E will also pay for any necessary tools. The employer is also eligible for a federal tax credit for hiring an individual who participated in a vocational rehabilitation program.

Special employer incentive program

This program is used for veterans facing extraordinary obstacles to employment. A veteran is placed in an OJT or a work experience with an employer. VR&E can reimburse the employer up to 50 percent of the veteran's salary for up to 6 months. The employer is also eligible for a federal tax credit for hiring an individual who participated in a vocational rehabilitation program.

Unpaid work experience program

A veteran is placed in a local, state, or federal government office. The placement does not count against the agency's FTE and the agency does not pay the veteran. VR&E pays the veteran monthly subsistence allowance while the veteran is participating in the program. During the placement, the veteran works toward gaining and/or strengthening particular skill sets. Though the office is under no obligation to hire the veteran, the goal of this program is for the veteran to obtain full-time, permanent employment in the office where he/she is placed or a similar office.

Source: U.S. Department of Veterans Affairs, Vocational Rehabilitation and Employment Service (www.vba.va.gov/bln/vre/emp_resources.htm).

3. Disabled Access Credit, Internal Revenue Code (IRC) Section 44

This tax credit is available to "eligible small businesses" in the amount of 50 percent of "eligible access expenditures" that exceed $250 but do not exceed $10,250 for a taxable year. A business may take the credit each year that it makes an eligible access expenditure.

Eligible small businesses are those businesses with either:

- $1 million or less in gross receipts for the preceding tax year; or

- 30 full-time employees or fewer during the preceding tax year.

Eligible access expenditures are amounts paid or incurred by an eligible small business for the purpose of enabling the business to comply with the applicable requirements of the Americans with Disabilities Act (ADA). These include amounts paid or incurred to:

- remove architectural, communication, physical, or transportation barriers that prevent a business from being accessible to, or usable by, individuals with disabilities;

- provide qualified readers, taped texts, and other effective methods of making materials accessible to people with visual impairments;

- provide qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;

- acquire or modify equipment or devices for individuals with disabilities; or

- provide other similar services, modifications, materials or equipment.

Expenditures that are not necessary to accomplish the above purposes are not eligible. Expenses in connection with new construction are not eligible. "Disability" has the same meaning as it does in the ADA. To be eligible for the tax credit, barrier removals or the provision of services, modifications, materials, or equipment must meet technical standards of the ADA Accessibility Guidelines where applicable. These standards are incorporated in Department of Justice regulations implementing Title III of the ADA (28 CFR Part 36; 56 CFR 35544, July 26, 1991).

> **Example** Company A purchases equipment to meet its reasonable accommodation obligation under the ADA for $8,000. The amount by which $8,000 exceeds $250 is $7,750. Fifty percent of $7,750 is $3,875. Company A may take a tax credit in the amount of $3,875 on its next tax return.

> **Example** Company B removes a physical barrier in accordance with its reasonable accommodation obligation under the ADA. The barrier removal meets the ADA Accessibility Guidelines. The company spends $12,000 on this modification. The amount by which $12,000 exceeds $250 but not $10,250 is $10,000. Fifty percent of $10,000 is $5,000. Company B is eligible for a $5,000 tax credit on its next tax return.

Source: "Facts About Disability-Related Tax Provisions," The U.S. Equal Employment Opportunity Commission (www.eeoc.gov/facts/fs-disab.html).

4. Architectural/Transportation Tax Deductions, IRC Section 190

The IRS allows a deduction up to $15,000 per year for "qualified architectural and transportation barrier removal expenses." Expenditures to make a facility or public transportation vehicle owned or leased in connection with a trade or business more accessible to, and usable by, individuals who are handicapped or elderly are eligible for the deduction. The definition of a "handicapped individual" is similar to the ADA definition of an "individual with a disability." To be eligible for this deduction, modifications must meet the requirements of standards established by IRS regulations implementing section 190.

Sources: "Facts About Disability-related Job Provisions" (www.rgpdental.com/pdf/ADAFactsSheet.pdf); and "Business Tax Credits and Reduced Labor Costs," Connecticut Department of Labor (www.ctdol.state.ct.us/gendocs/GCEPD/bustaxcredits.htm).

Federal Executive Orders

Executive Order 13078—Increasing Employment of Adults with Disabilities

Establishes a National Task Force on Employment of Adults with Disabilities to analyze existing programs and policies of member agencies; recommend options to address health coverage barriers; analyze state and private disability systems; review research, evaluate, coordinate, and collaborate on research and demonstration priorities; analyze youth programs related to employment; evaluate the feasibility of a single governmental entity to provide electronic and computer accommodations; consult with the President's Committee on Mental Retardation; and recommend additional steps to the president to advance the employment of adults with disabilities.

Source: Federal Register, Vol. 63, No. 52. March 18, 1998.

Executive Order 13163—Increasing the Opportunity for Individuals with Disabilities to Be Employed in the Federal Government

Requires federal agencies to increase employment opportunities for individuals with disabilities employed at all levels and occupations in the federal government. It focuses attention on the need to hire and advance qualified individuals with disabilities within the federal government. Executive Order 13163 also requires each federal agency to have a plan as to how it will increase the opportunities for individuals to be hired in the agency.

Source: Federal Register, Vol. 65, No. 146, July, 26, 2000.

Executive Order 13164—Requiring Federal Agencies to Establish Procedures to Facilitate the Provision of Reasonable Accommodation

Requires federal agencies to establish written procedures to facilitate the provision of reasonable accommodations, including how to initiate a request, how requests will be processed, time limits for decision making, responsibilities of the employee to provide appropriate medical information, provision for a reassignment option, and provision for denials in writing with reasons.

Source: Federal Register, Vol. 65, No. 146, July 28, 2000.

Executive Order 13518—Employment of Veterans in the Federal Government

Establishes an interagency Council on Veteran's Employment and requires member agencies and departments to undertake veterans employment initiatives to develop agency-specific operational plans for promoting employment opportunities for veterans, to establish a Veterans Employment Program Office in each agency, to provide mandatory annual training for human resources personnel and hiring managers on veterans' employment, to identify key occupations for which the agency will provide support to veterans, and to coordinate with the Departments of Defense and Veterans Affairs to promote technology to assist veterans with disabilities. It sets out additional responsibilities for the Director of the Office of Personnel Management and the Secretaries of Defense, Labor, Veterans Affairs, and Homeland Security.

Source: Federal Register, Vol. 74, No. 218, November 13, 2009.

Executive Order 13548—Increasing Federal Employment of Individuals with Disabilities

Requires the U.S. Office of Personnel Management to design model recruitment and hiring strategies for federal agencies to increase employment opportunities for individuals with disabilities and requires each federal agency to develop a plan for promoting employment opportunities for individuals with disabilities, including performance targets and numerical goals; to designate a senior official to be accountable; to utilize Schedule A authority to hire applicants with mental retardation or a severe physical or psychiatric disability to fill any job in which the person is able to perform with or without reasonable accommodation; and to improve retention and return to work.

Source: Federal Register, Vol.75, No. 146, July 30, 2010.

Executive Order 13583—Establishing a Coordinated Government-wide Initiative to Promote Diversity and Inclusion in the Federal Workforce

Requires the Office of Personnel Management and the Office of Management and Budget to establish a government-wide initiative to promote diversity and inclusion in the federal workforce; develop a government-wide strategic plan and guidance for agency-specific plans within 90 days; identify leading practices to improve agency efforts; and establish a system for reporting on agency progress.

The plans should identify strategies to remove barriers to equal opportunity in federal government recruitment, hiring, promotion, retention, professional development and training. Within 120 days after the government-wide plan is released, each agency must issue its own agency-specific Diversity and Inclusion Strategic Plan.

Source: Federal Register, Vol. 76, No. 163, August 23, 2011.

Standard Form 256: Self-Identification of Disability

SELF-IDENTIFICATION OF DISABILITY
(see instructions and Privacy Act information on reverse)

Last Name, First Name, and MI	Date of Birth (mm/yy)	Social Security Number	ENTER CODE HERE ------->

Definition:
An Individual with a disability: A person who (1) has a physical impairment or mental impairment (psychiatric disability) that substantially limits one or more of such person's major life activities; (2) has a record of such impairment; or (3) is regarded as having such an impairment. This definition is provided by the Rehabilitation Act of 1973, as amended (29 U.S.C. 701 et. seq.).

Purpose:
Self- identification of disability status is essential for effective data collection and analysis. The information you provide will be used for statistical purposes only and will not in any way affect you individually. While self- identification is voluntary, your cooperation in providing accurate information is critical.

Part I. Targeted/Severe Disabilities

Hearing
18 - Total deafness in both ears (with or without understandable speech)

Vision
21 - Blind (inability to read ordinary size print, not correctable by glasses, or no usable vision, beyond light perception)

Missing Extremities
30 - Missing extremities (missing one arm or leg, both hands or arms, both feet or legs, one hand or arm and one foot or leg, one hand or arm and both feet or legs, both hands or arms and one foot or leg, or both hands or arms and both feet or legs)

Partial Paralysis
69 - Partial paralysis (because of a brain, nerve or muscle impairment, including palsy and cerebral palsy, there is some loss of ability to move or use a part of the body, including both hands; any part of both arms or legs; one side of the body, including one arm and one leg; and/or three or more major body parts)

Complete Paralysis
79 - Because of a brain, nerve or muscle impairment, including palsy and cerebral palsy, there is a complete loss of ability to move or use a part of the body, including both hands; one or both arms or legs; the lower half of the body; one side of the body, including one arm and one leg; and/or three or more major body parts

Other Impairments
82 - Epilepsy
90 - Severe intellectual disability
91 - Psychiatric disability
92 - Dwarfism

Part II. Other Disabilities

Hearing Conditions
15 - Hearing impairment/hard of hearing

Vision Conditions
22 - Visual impairments (e.g., tunnel or monocular vision or blind in one eye)

Physical Conditions
26 - Missing extremities (one hand or one foot)
40 - Mobility impairment (e.g., cerebral palsy, multiple sclerosis, muscular dystrophy, congenital hip defects, etc.) 41 - Spinal abnormalities (e.g., spina bifida, scoliosis) 44 - Non- paralytic orthopedic impairments: 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
61 - Partial paralysis of one hand, arm, foot, leg, or any part thereof
70 - Complete paralysis of one hand
80 - Cardiovascular/heart disease with or without restriction or limitation on activity; a history of heart problems w/complete recovery 83 - Blood diseases (e.g., sickle cell anemia, hemophilia) 84 - Diabetes 86 - Pulmonary or respiratory conditions (e.g., tuberculosis, asthma, emphysema, etc.)
87 - Kidney dysfunction (e.g., required dialysis)
88 - Cancer (present or past history)
93 - Disfigurement of face, hands, or feet (such as those caused by burns or gunshot wounds) and noticeable gross facial birthmarks 95 - Gastrointestinal disorders (e.g., Crohn's Disease, irritable bowel syndrome, colitis, celiac disease, dysphexia, etc.) 98 - History of alcoholism

Speech/Language/Learning Conditions
13 - Speech impairment - Includes impairments of articulation (unclear language sounds), fluency (stuttering), voice (with normal hearing), dysphasia, or history of laryngectomy
94 - Learning disability - a disorder in one or more of the processes involved in understanding, perceiving, or using language or concepts (spoken or written) (e.g., dyslexia, ADD/ADHD)

Other Options
01 - I do not wish to identify my disability status. (Please read the notes on the next page.) (Note: Your personnel officer may use this code if, in his or her judgment, you used an incorrect code.)
05 - I do not have a disability.
06 - I have a disability, but it is not listed on this form.

Standard Form 256: Self-Identification of Disability (continued)

The Rehabilitation Act of 1973

The Rehabilitation Act, as amended (29 U.S.C. 701, et seq.), requires each agency in the executive branch of the Federal Government to establish programs that will facilitate the hiring, placement, and advancement of individuals with disabilities. The best means of determining agency progress in this respect is through the production of reports at certain intervals showing such things as the number of employees with disabilities who are hired, promoted, trained, or reassigned over a given time period; the percentage of employees with disabilities in the workforce and in various grades and occupations; etc. Such reports bring to the attention of agency top management, the U.S. Office of Personnel Management (OPM), and the Congress deficiencies within specific agencies or the Federal Government as a whole in the hiring, placement, and advancement of individuals with disabilities and, therefore, are the essential first step in improving these conditions and consequently meeting the requirements of the Rehabilitation Act.

The disability data collected on employees will be used only in the production of reports such as those previously mentioned and not for any purpose that will affect them individually. The only exception to this rule is that the records may be used for selective placement purposes and selecting special populations for mailing of voluntary personnel research surveys. In addition, every precaution will be taken to ensure that the information provided by each employee is kept to the strictest confidence and is known only to those individuals in the agency Personnel Office who obtain and record the information for entry into the agency's and OPM's personnel systems. You should also be aware that participation in the disability reporting system is entirely voluntary, **with. the exception of employees appointed under Schedule A, SECTION 213.3102(u) (Severe physical or mental disabilities).** These employees will be requested to identify their disability status and if they decline to do so, their correct disability code will be obtained from medical documentation used to support their appointment.

Employees will be given every opportunity to ensure that the disability code carried in their agency's and OPM's personnel systems is accurate and is kept current. They may exercise this opportunity by asking their Personnel Officer to see a printout of the code and definition from their records. The code carried on employees in the agency's system will be identical to that carried in OPM's system.

Your cooperation and assistance in establishing and maintaining an accurate and up- to- date disability report system is sincerely appreciated.

Privacy Act Statement

Collection of the requested information is authorized by the Rehabilitation Act, as amended (29 U.S.C. 701, et seq.). Solicitation of your Social Security Number (SSN) is authorized by Executive Order 9397, which permits agencies to use the SSN as the means for identifying persons with disabilities in personnel information systems. Your SSN will only be used to ensure that your correct disability code is recorded along with other employee information that your agency and OPM maintain on you. Furnishing your SSN or any other data requested for this collection effort is voluntary and failure to do so will have no effect on you. It should be noted, however, that where individuals decline to furnish their SSN, the SSN will be obtained from other records in order to ensure accurate and complete data. Employees appointed under Schedule A, Section 213.3102 (u) (Severe physical or mental disabilities) are requested to furnish an accurate disability code, but failure to do so will not affect them. Where employees hired under one of these appointing authorities fail to disclose their disability(ies), however, the appropriate code will be determined from the employee's existing records or medical documentation physically submitted upon appointment.

The AIM Network at KPMG

KPMG LLP, the U.S. audit, tax, and advisory services firm, has an track record in attracting and retaining employees with disabilities and creating a work culture in which they can thrive. The firm's Diversity Networks—employee resource groups—are central to its diversity strategy. The Abilities in Motion (AIM) network, for example, is KPMG's resource group for employees with disabilities or those who are caregivers to people with disabilities. Its goal is to promote an environment of mutual respect and teamwork among all our people, while providing an avenue for those seeking the guidance, encouragement, and camaraderie of others who have successfully faced similar challenges. It is especially focused on continuing to develop a culture of respect and inclusion in which people with disabilities are recognized for their abilities.

AIM has an advisory board of 14 people, consisting of partners and employees from various levels and geographies. It meets quarterly and members actively participate in six committees: internal events and activities, employee resources and support, internal communication, training, go to market, and recruiting.

Matt Grove, director of Experienced Hire Recruiting for the Tax business, advises networks and chapters to "find the highest level executive, who is connected, to be a visible champion." Co-chairing the KPMG AIM network are Dana Foote, an audit partner in the New York office, and Shaun Kelly, vice chair of operations and a member of KPMG's management committee, its top 10 officers. Both Foote and Kelly have a personal interest in people with disabilities. Foote has multiple sclerosis and is a legal guardian for her sister, who has Down syndrome. Kelly is the parent of a child with Down syndrome. Conversations with Kelly, Foote, and their KPMG colleagues identify five critical factors at the foundation of AIM's success: top management commitment, focus on self-disclosure, the voice of the grassroots, communications, and fit.

Critical Success Factors

1. Top management commitment

Commitment to diversity starts at the top with John Veihmeyer, chairman and CEO of KPMG LLP. Veihmeyer speaks about how his personal and professional experiences have fueled his passion:

> It takes more than passion and the absolute belief that diversity is "the right thing to do," if we are to continue to achieve our objectives. That's why, like anything we try to accomplish as a firm, diversity is a business imperative for KPMG, one that's aligned with and supports our strategic priorities. We believe our intellectual capital must be as diverse as the clients we serve and the communities we work in; and that our ability to leverage the diverse experiences, talents, ideas, and perspectives of all our people is absolutely linked to our commercial success.

That diversity is a business imperative is repeated by managers throughout the organization. And they strongly believe that Veihmeyer's remarks are sincere.

Both Foote and Kelly emphasize the importance of respecting that everyone involved has significant work responsibilities. Their own positions come with serious responsibilities, yet their passion has led them to become deeply committed diversity leaders, a message that is not lost on KPMG's professionals, especially those with disabilities. For Kelly, that commitment cannot be faked, "People will see right through you."

To raise the commitment level of leaders at all levels, Foote and Kelly hammer away at the business case. "You really do realize," Kelly points out, "that you have a better workforce when you have diverse perspectives. Some you can measure, but some you must take on faith." For example, KPMG's annual Work Environment Survey indicates a strong correlation between the degree to which professionals feel the environment is inclusive and the degree to which they believe that KPMG is a great place to work. Further driving commitment, all partners and managers at KPMG have diversity goals built into their performance assessment process.

2. Focus on self-disclosure

Though 78 percent of employees with disabilities in the United States have disclosed their disability to someone in the organization, most make that disclosure because their disability is visible or there was a need for others to know.[275] Once comfortable and having demonstrated her professional abilities, Foote ultimately disclosed her disability because, "I'd rather people know I have MS than have them wondering why I'm stumbling at work." Furthermore, it is unhealthy for organizational culture, employee engagement, and employees themselves if they must hide meaningful elements of their identity.

AIM has also benefitted from the advice of the pride@ kpmg network, which supports KPMG's lesbian, gay, bisexual, and transgender professionals and their allies, who themselves have addressed the disclosure issue. Kelly emphasizes the cross-fertilization benefits that come from collaboration among networks.

On KPMG's intranet site, The *Success at KPMG Series* has profiled a number of professionals with disabilities and caregiving responsibilities, often in leadership positions, who are succeeding at KPMG and in their personal lives. One employee noted, "When people see others disclose who are succeeding in their careers, it opens the door for them to disclose."

KPMG also includes "yes/no" questions on disability status in the demographic section of its confidential Work Environment Survey. Specifically, they ask: "Do any of the following describe you? Person with disabilities? Primary caregiver to a person with disabilities?" Although this information is not shared with a respondent's supervisor or peers, the information allows KPMG to compare the results for people with disabilities to the firm-wide results and identify significant gaps.

Foote and Kelly emphasize the importance of creating a culture where it is safe for everyone to bring their authentic, whole selves to work. To help build that culture, KPMG has introduced a transparent, streamlined process for requesting accommodations.

KPMG also provides Disabilities Awareness Training, which addresses myths about people with disabilities, provides etiquette for interacting with those who are disabled, and increases awareness about available resources such as their content rich website. There is also training for HR professionals and the recruiting team, which focuses on increasing their confidence that they will do the right thing in interactions with people with disabilities.

3. The voice of the grassroots

It is vital for network leaders to understand the needs of existing and potential constituents. Recalling an aphorism from his native Ireland, Kelly cautions, "If you want to go fishing, you have to listen to the river."

KPMG's Diversity Advisory Board (DAB), its diversity council, reports directly to the CEO. In addition to the CEO, the chief human resources and diversity officers participate in the DAB, which meets at least quarterly for one or two days. Rounding out the membership are

the twelve co-chairs of the six Diversity Networks, many of whom are firm officers. The DAB creates a direct channel for diverse grassroots input through the Diversity Networks right to the top.

AIM also has a focus group that meets by phone every other month to determine what the network can do to improve. The focus group provides feedback to the advisory board on proposed initiatives and insight into the key issues facing people with disabilities in the firm. It provides additional credence to recommendations the advisory board makes.

Going beyond the Americans with Disabilities Act requirements, the operations organization conducted facility audits in 70 KPMG U.S. offices to "identify aspects of our workplace that may pose a challenge to people with disabilities." They identified 600 challenges requiring follow up and resolved 500 quickly. They continued to work with office managers, the real estate group, and office managing partners until all items were resolved.

4. Communications

KPMG fosters communication about professionals with disabilities internally and externally and among network members. For example, it has recruited a senior communications staff person to its AIM Advisory Board; frequently profiles professionals with disabilities on *KPMG Today*, the home page of the firm's intranet site; maintains its own website; and conducts quarterly network webinars. Externally, KPMG has participated in multiple conferences to share its approach and lessons learned about supporting people with disabilities.

5. Fit

KPMG also provides professionals with opportunities to serve as AIM network volunteers. KPMG takes great care in matching people to the roles they play, focusing on matching passion, skills, and competencies to the job, while providing opportunities for leadership development.

In addition, KPMG is not a command and control culture, a model that is unlikely to work with its many, far-flung offices of professionals. With 12 chapters across the United States, Foote stresses, "The needs of a chapter in Dallas are different from a chapter in New York City." The AIM network tailors its activities to the cultures in which its chapters reside. To ensure local interests are met, chapter members determine what events they will undertake.

Key Initiatives

Among the initiatives that AIM undertakes, members point to two with special significance. On the AIM website is a list of mentors with self-disclosed disabilities who have volunteered to provide advice and support to others at KPMG who are disabled or caring for a disabled person.

KPMG has been the title sponsor of the Special Olympics golf tournament since 2009. In 2010, 150 KPMG staff members from 30 offices across the country volunteered to staff the golf tournament and professionals raised close to $25,000 to help transport athletes to the games, which took place in Lincoln, Nebraska. In 2011, approximately 50 KPMG volunteers staffed the National Invitational Golf Tournament in Port St. Lucie, Florida, some paying their own way to volunteer at this event. An employee who volunteered for the Special Olympics found it the most personally rewarding of his AIM network activities. He recalls vividly the "utter joy on the faces of the participants."

Walgreens' Winning Warehouse

In 2003, Walgreens began planning for a new distribution center in Anderson, South Carolina. According to Randy Lewis, senior vice president of supply chain and logistics at Walgreens and the force behind the plan, they started with three goals. First, they sought to set a new standard in productivity for Walgreens, which today has 17 distribution centers, including Anderson, employing 10,000 full-time employees and serving 7,600 stores. Second, they wanted to establish "an inclusive environment where one-third of the workforce was made up of people with disabilities who might not otherwise have a job."[276] Third, they wanted a sustainable business model, not a charity, "where people with and without disabilities work side by side, earning the same pay, doing the same jobs and [are] held to the same productivity and other workplace standards."[277]

The center employed cutting-edge technology and used universal design principles. Universal design is "the design of products and environments to be usable by all people, to the greatest extent possible, without the need for adaptation or specialized design."[278] Walgreens subsequently found that most of the "steps [they] took to make work easier and more productive for people with disabilities made work easier and more productive for all employees."[279]

Benefits

Walgreens exceeded all of its goals. The center has been 20 percent more efficient than other plants. People with disabilities now compose almost 40 percent of the Anderson workforce. There has been no additional cost for these accomplishments. All employees have been held to the same standards.

Perhaps most powerful have been the benefits to Walgreens culture. Randy Lewis points out that:[280]

> Along the way, we discovered another, more intangible but powerful benefit. That is the impact our commitment to employing people with disabilities has had on our work environment and on each one of us. As you walk through these buildings, there is a sense of teamwork, common purpose and mutual respect unlike we had ever experienced. We set out to change the workplace but instead found that we were the ones who were changed. In going through the effort to unleash each person's gifts, we have discovered the completeness in all of us. There is no "them" and "us."

> For those directly involved, it is as if we have been awakened from our slumber of self. The satisfaction of our own success does not compare to the satisfaction of making those around us successful. This has made us better stewards of our work. And more importantly, better parents, better spouses, better citizens, and better people.

Lessons Learned

Walgreens has taken a great deal from its experience at Anderson. It has learned that partnership is a key to success. The Anderson County Disabilities and Special Needs Board and the South Carolina Vocational Rehabilitation Department have played a vital role in Walgreens' success, especially in preparing people with disabilities for employment.

Walgreens has debunked a major myth—that people with disabilities jeopardize safety. "The fatal injury rate for the warehousing industry is higher than the national average for all industries."[281] "An analysis conducted by Walgreens Supply Chain and Logistics showed that lift truck drivers with disabilities in four distribution centers, including Anderson, had 34 percent fewer accidents per 1,000 hours in motion than those with no disclosed disability. Workers' compensation costs at the Anderson distribution center for occupational injury claims over a 32 month period were 67 percent lower for medical treatment, 73 percent lower for lost wages, and 77 percent lower for expenses for team members with disabilities than for those with no disclosed disability."[282]

Deb Russell, manager of the Career Outreach Department at Walgreens, says, "There is no step-by-step guide to become an inclusive employer."[283] You have to jump in and you do not need experts to guide you (although Walgreens provides tours of the Anderson distribution center).[284] Russell encourages, "Our best learning was to *do* this, not to wait, not to plan, not to attend meetings."[285]

Managers and supervisors received disability awareness training. However, Russell points out, "They all said that [there was] no training [that] was better than having people with disabilities in their departments."[286]

Breaking the Odds at the
University of Illinois at Urbana-Champaign

> Spinal Muscular Atrophy (my disability) has a median life expectancy of 45. I wake up every morning scared. Scared that I will become just another statistic. Scared that my dreams and goals will fall apart because I let my resolve waver. Scared I won't work hard enough in my life to keep my independence. Scared that, just once, when someone tells me it can't be done, I'll listen. Scared the next 20–30 years will pass without much resistance, and I'll arrive safely at an early grave without much to show for my time. Scared that when I go, all those numbers will be the same, plus 1 of course. Scared that every perception of people like me will stay perfectly intact, and I'll have reinforced a few. But most of all I'm scared because there are people like me who aren't waking up today, and they never found a way to fight the odds instead succumbing to statistics. Time to move.

Brian O'Donnell junior, University of Illinois Urbana-Champaign

During the research process, it became clear that many colleges and universities were outpacing business and government in creating environments in which people with disabilities could thrive and succeed. As living and learning communities, universities have distinct purposes. Yet, universities are particularly instructive for business and government in two ways—as potential models for how to build inclusive communities and as a window into the crystallizing identities of the young people with severe disabilities who will shortly be entering the workplace.

The first step was to identify the top colleges and universities for people with disabilities. Pioneers such as the University of California at Berkeley, Gallaudet University, and the University of Illinois at Urbana-Champaign showed up repeatedly, as did Edinboro University in Pennsylvania, the Florida State University, and the Universities of Wisconsin, California at Los Angeles, and Colorado at Denver. Researching the University of Illinois at Urbana-Champaign (UIUC), revealed the blog "Breaking the Odds" (www.breaking-the-odds.com/), which is the candid creation of six students with severe disabilities.

While the author provides background and context, the six students, Ian Nelson, John Burton, Brian O'Donnell, David Kirby, Kelsey Rozema, and Kushal Parikh, provide the commentary on how they are recreating their lives at UIUC. First, they describe their purpose:

Before we tell you exactly what [our blog] is all about, let's first tell you what it is not all about. Most stories about disability try to evoke one of two reactions: pity or admiration. They either paint a bleak, hopeless picture or an inspirational, extraordinary picture. We will be doing neither. What we aim to do is educate people, both people with and without disabilities. We by no means claim to have all the answers. But what we do have is six lifetimes worth of firsthand experience. Ultimately we would like to be able to show able-bodied people that we are more alike than we are different. And we hope to inspire other disabled people to seek higher education; so they can realize their potential. But at the end of the day, if our blog can help just one person, and make his or her life somewhat better than it would have been otherwise, then it is all worth it.[288]

The Division of Disability Resources and Educational Services (DRES) at the University of Illinois at Urbana-Champaign (UIUC), the flagship of the Illinois public higher education system, was founded in 1948 by Tim Nugent to provide educational opportunities to disabled veterans returning from World War II. DRES was the first support system for people with disabilities at any postsecondary institution in the world. Since 1948, UIUC has recorded a long list of firsts, including:

- The first postsecondary institution to introduce curb cuts
- The first fixed-route buses designed with wheelchair lifts
- The first accessible university residence halls
- The first university to accommodate students who require personal assistant services
- The first collegiate adapted sports and recreation program for students with disabilities, which produced the first wheelchair athlete to win an Olympic Gold Medal
- The first university service and advocacy fraternity composed of students with disabilities—Delta Sigma Omicron
- The research for and development of the first architectural accessibility standards that became the American National Standards Institute Standards

DRES provides supports and services to students with a full range of disabilities. Perhaps most telling is the system that DRES has created for more severely disabled students that has achieved three critical outcomes through a series of programs and supports: independence, integration, and equality.

In partnership with University Housing, DRES' Beckwith Residential Support Services opened a floor in a new residence hall named after Tim Nugent in the fall of 2010. Some of the six bloggers were among the inaugural group. The program, on the first floor of Nugent Hall and referred to as Beckwith, is described by the students:

> [It] has all the bells and whistles. Every door to enter the building and the cafeteria, which is adjoining to the dorm, is automatic. Each door opens with the push of a button; all the resident has to do is nudge the button with their wheelchair.
>
> The resident rooms themselves all have keyless entry. This means that anyone with limited use of their arms can easily get in and out of their room while still having the peace of mind of locking their door. Keyless means exactly what it says. Each resident has a student ID which doubles as a room key; simply hold your ID up to the card reader and the door will open automatically.
>
> Once you enter a resident's room, there is still even more technology awaiting you. The rooms are suite style, with two rooms sharing a bathroom and the doors leading into the bathroom have automatic doors which also open with the push of a button.[289]

In addition, each bedroom has a lift that extends from over the student's bed to the bathroom, a specially equipped sink, and a wireless paging system for connecting with staff.

Independence and Integration

Central to the achievement of independence and integration are the personal assistants, or PAs, who provide assistance to those with severe disabilities in activities of daily living, including dressing, showering, using the bathroom, and grooming. PAs are recruited from the UIUC student body and take shifts on the first floor of Nugent Hall. The university screens and approves PAs, but the residents do their own hiring, scheduling, personal instruction, and management of their PAs themselves. This is a vital entrée to independence, since PAs will be central to the future lives of most of these students. And the hiring, retention, and management of PAs are typically high on the list of challenges faced by people with significant mobility disabilities who are living independently. Brian O'Donnell observes, "Moving out of Beckwith, I saw that a lot of the safety nets were removed and I had to take on much more of the responsibility. Because of my time in the Beckwith program, I was much more equipped to handle it."

O'Donnell goes on to elaborate a critical outcome of the relationship between PAs and students and how it networks them on campus:

> The individual students do much of the integration, and much of that is done through the relationships developed between resident and PA. The irony is there is an administrative policy to discourage those types of relationships, to no avail. So, Beckwith certainly does aid in the integration to normal campus, just not as they had anticipated.

Other program components that foster independence and integration are the Transitional Disability Management Plan, athletics, and Delta Sigma Omicron. The Transitional Disability Management Plan, called DMP by the students, provides Beckwith students with a disability specialist who works one-on-one to determine which skills students want to increase and then put together a plan in such areas as: "improved skill in advocating for access and reasonable accommodation, improved physical and/or functional capacity, improved social integration, maximal independence in the performance of activities of daily living, and accessible living."[290]

In keeping with being the first collegiate adapted sports and recreation program, UIUC offers men's and women's wheelchair basketball and wheelchair track intercollegiate programs. In addition, it offers summer camps for elite and less seasoned athletes and coaches clinics.

Founded as a fraternity for students with disabilities, Delta Sigma Omicron is now open to any student enrolled at the university and alumni and has the purpose of "ensuring that qualified individuals with disabilities are afforded an equal opportunity to participate in and benefit from the curricular, co-curricular and vocational opportunities available at UIUC." Its motto is "To exercise our abilities to a maximum so as to minimize our disabilities, that we may live most and serve best."[291]

While the services are extraordinary, David Kirby, a senior, points to the accompanying supportive culture at UIUC:

> The services offered at Beckwith are great and give people a chance to go away to school who would not otherwise have the opportunity to do so. That all sounds really great, but the services are not the greatest part about living here. The culture created by such inclusion is the truly unique part. From the first day I moved in here, I immediately started to notice the profound differences in the way people interacted with each other.

People with disabilities would talk to each other quite openly and in an appropriate amount of detail about their disabilities and even joke about them. I was accustomed to the idea that disabilities were a mark of shame or something that you shouldn't talk about, but that didn't seem to matter. People with disabilities and people without were talking as equals, even flirting in some cases. There wasn't any hint of a condescending tone or pity or anything like that. It kind of caught me off guard, but in the best possible way. As a freshman, I was very awkward and not the most socially adept person, but in this environment I quickly learned all the social skills I needed and THAT is the way Beckwith has changed me and prepared me for the rest of my life.

The University, Kirby believes, eschews *in loco parentis* for Beckwith students, allowing them to "skin their knees" and experiment with their independence:

My independence is not so much encouraged as allowed to grow. The staff here allows you to live your life and let you make your own decisions—good or bad or horrible. This gives you a lot of confidence when you finally realize you can successfully manage your own life. Parents tend to baby their children when they have a disability, and never allow them to make their own decisions. This has a very damaging effect on a person's self-confidence. After all, if your parents don't seem to trust you to run your own life then how can you be expected to trust yourself?

Equality

Support for independence and integration by encouraging self-advocacy and connectedness also promotes equality for students with disabilities. O'Donnell believes, "This school gives you all the tools to level the playing field then challenges you to use them." In that toolkit are a series of accommodations that promote equality, including note taking services, priority course registration, testing accommodations, text conversion, assistive technology,

tutoring, neuropsychological testing, study abroad, and for those students who have a documented profound hearing loss or deafness, DRES will provide qualified sign language interpreters or Computer Assisted Realtime Translation (CART) and video captioning services.

Equally important to equality as accommodations are the campus and off-campus environment and the attitudes of the surrounding community. Kushal Parikh, a senior, stresses, "U of I feels like a community effort toward disability. Even off campus people are more comfortable around disability which makes it so much more supportive of a community." O'Donnell points to the campus environment:

I think that because of the fact that the whole campus has tailored much of itself to accommodate people with disabilities, much of the supportive and accepting nature is institutionalized. Classes like SPED 117 [The Culture of Disabilities Across the Lifespan], REHB 330 [Disability in American Society], and others work to educate students on many aspects of living with a disability. On top of that, Illinois has sheer exposure working in its favor. Since so many people either have friends with disabilities or a friend that works as a PA, the comfort level is much higher than most other places.

As he contemplates moving beyond the walls of UIUC, Kirby concludes:

I feel the system at Nugent is nothing but a glimpse of the future, of what it could be like for people with disabilities at some point. It is clearly ahead of its time with its services and structure. You don't see that stuff anywhere. And the culture that follows is truly unique—a culture and social structure in which everyone, disabled and not, are equal. I sometimes lose this perspective and feel like I'm entitled to this cultural environment everywhere I go. But that is not possible. It's not where we are right now; society is not quite there yet. All I have right now is a glimpse.

Endnotes

1 The six disability types referenced in the survey include sensory disability, physical disability, mental disability, self-care disability, go-outside-home disability, and employment disability. For more information on the categories and the survey, visit the U.S., Census Bureau website (www.census.gov/hhes/www/disability/acs.html).

2 United Nations, *Convention on the Rights of Persons with Disabilities and Optional Protocol*, 2008, retrieved from (http://www.un.org/disabilities/documents/convention/convoptprot-e.pdf) on March 8, 2012.

3 William Erickson, Camille Lee, and Sarah von Schrader, 2009 *Disability Status Report: United States* (Ithaca, NY: Cornell University Employment and Disability Institute, 2011), p. 39.

4 Terence McMenamin, "Full- and Part-time Worker Distribution by Disability Status," *Persons with a Disability: Labor Force Characteristics—2010* (Bureau of Labor Statistics, presentation, August 3, 2011).

5 T.M. McMenamin, T.W. Hale, D. Kruse, and Haejin Kim, *Designing Questions to Identify People with Disabilities in Labor Force Surveys: The Effort to Measure the Employment Level of Adults with Disabilities in the CPS*, (Employment Rate Measurement Methodology Work Group, Presidential Task Force on the Employment of Adults with Disabilities, August 2005).

6 *Towards a Common Language for Functioning, Disability and Health: ICF World Health Organization* (Geneva: World Health Organization, 2002). The report is available online (www.who.int/classifications/icf/training/icfbeginnersguide.pdf).

7 For more on the U.S. Census Bureau's definition of disability, visit their website (www.census.gov/hhes/www/disability/disab_defn.html). For comparison, also see *International Classification of Functioning, Disability, and Health*, World Health Organization, 2001.

8 *International Classification of Functioning, Disability, and Health*, The World Health Organization offers a number of resources on the ICF, including a checklist to use for obtain information on an individual's functioning and disability (www.who.int/classifications/icf/training/icfchecklist.pdf).

9 See Section 902 of the ADA (www.eeoc.gov/policy/docs/902cm.html).

10 For more information, please see "Disability and HR: Tips for Human Resource Professionals," Cornell ILR School Employment and Disability Institute website (www.ilr.cornell.edu/edi/hr_tips/article_1.cfm?b_id=27&h_id=2&view=true).

11 Part 1630—Regulations to implement the equal employment provisions of the Americans with Disabilities Act, Code of Federal Regulations (July 1, 2011).

12 "Will workers in America ignore the risks, hope to dodge the bullet, or simply hide? Perceptions, misconceptions, and best practices about long-term disability," Sun Life Financial, Benefits Planning Report, Spring/Summer 2012, p. 4, retrieved on August 23, 2012 (cdn.sunlife.com/static/unitedstates/files/Whitepapers/Report%20-%20Long-Term%20Disability%20-%20Misperceptions%20+%20Best%20Practices.pdf).

13 "Table A-6 Employment status of the civilian population by sex, age, and disability status, not seasonally adjusted," U.S. Bureau of Labor Statistics, Economic News Release, February 2012.

14 Patricia Digh, "America's Largest Untapped Market: Who They Are, the Potential They Represent," *Fortune*, March 1998.

15 Erickson, Lee, and von Schrader, *2009 Disability Status Report: United States* .

16 "Persons with a Disability: Labor Force Characteristics —2009," Bureau of Labor Statistics, News Release, August 25, 2010.

17 Disability statistics are taken from the 2010 American Community Survey (ACS), which was conducted by the Cornell University Rehabilitation Research and Training Center on Disability Demographics and Statistics (StatsRRTC) in 2012. Statistics were retrieved August 12, 2012, from the "Disability Statistics" website (www.disabilitystatistics.org).

18 Joyce Fan, David Bonauto, Michael Foley, and Barbara Silverstein, "Underreporting of Work-Related Injury or Illness to Workers' Compensation: Individual and Industry Factors," *Journal of Occupational and Environmental Medicine*, 48, no. 9, pp. 914–922; and K. Rosenman, J. Gardiner, J. Wang, and J. Biddle, "Why Most Workers With Occupational Repetitive Trauma Do Not File for Workers' Compensation," *Journal of Occupational and Environmental Medicine*, 42, no. 1, 2000, pp. 25-34.

19 Rosenman, Gardiner, Wang, and Biddle, "Why Most Workers With Occupational Repetitive Trauma Do Not File for Workers' Compensation."

20 Gwen Thayer and Susanne M. Bruyère, "Health Benefit Plans and the Americans with Disabilities Act," Employment and Disability Institute, Cornell University, August 2000.

21 David Stapleton and Su Liu, "Will Health Care Reform Increase the Employment of People with Disabilities?" Disability Policy Research Brief, Center for Studying Disability Policy, Mathematica Policy Research, Number 09-04, November 2009; Nanette J. Goodman, David C. Stapleton, Gina A. Livermore, and Bonnie O'Day, "The Health Care Financing Maze for Working-Age People with Disabilities," Rehabilitation Research and Training Center for Economic Research on Employment Policy for Persons with Disabilities, Cornell University, January 2007.

22 McMenamin, *Persons with a Disability: Labor Force Characteristics—2010*.

23 Calculations are taken from "Table 2: Employed full- and part-time workers by disability status and age, 2010 annual averages," in McMenamin, *Persons with a Disability: Labor Force Characteristics—2010* (Bureau of Labor Statistics, U.S. Department of Labor, 2011) and *Employer Health Benefits: 2011 Annual Survey*, The Kaiser Family Foundation and Health Research & Educational Trust, p. 39.

24 *Employer Health Benefits: 2011 Annual Survey*, Kaiser Family Foundation, p. 66.

25 Helen A. Schartz, D.J. Hendricks, and Peter Blanck, "Workplace accommodations: Evidence based outcomes," *Work*, 27, 2006, pp. 345–354.

26 Peter David Blanck, "The Economics of the Employment Provisions of the Americans with Disabilities Act: Part I – Workplace Accommodations," *DePaul Law Review*, 46, no. 4, 1997, pp. 877–914.

27 Melissa Bjelland, Susanne Bruyère, Sarah von Schrader, Andrew Houtenville, Antonio Ruiz-Quintanilla, and Douglas Webber, "Age and Disability Employment Discrimination: Occupational Rehabilitation Implications," *Journal of Occupational Rehabilitation*, 20, no. 4, pp. 456–471.

28 "The Americans with Disabilities Act 20th Anniversary," U.S. Equal Employment Opportunity Commission, last accessed on August 21, 2012 (www.eeoc.gov/eeoc/history/45th/ada20). Additional calculations provided by the authors.

29 Susanne Bruyère, Sarah von Schrader, and Wendy Coduti, "U.S. Employment Disability: Discrimination Charges: Implications for Disability Management Practice," (IFDMRN GLADNET Researchers Network, September 18, 2010).

30 Lisa Nishii and Susanne Bruyère, "Engagement of people with disabilities: Unit-level climate and manager characteristics," 2009, (Paper presented in L.Nishii, Chair, Organizational factors in engaging, advancing, and retaining employees with disabilities. Symposium conducted at the annual convention of the American Psychological Association in Toronto, Canada, 2009).

31 Beth Loy and Linda Carter Batiste, "Universal Design and Assistive Technology as Workplace Accommodations," Job Accommodation Network, Office of Disability Employment Policy, U.S. Department of Labor, p. 11, accessed August 28, 2012 (askjan.org/research/JANUDATWhitePaper.doc).

32 *Survey of Employment of Americans with Disabilities,* Kessler Foundation and National Organization on Disability (Conducted by Harris Interactive, October 2010).

33 Brigida Hernandez and Katherine MacDonald, *Exploring the Bottom Line: A Study of the Costs and Benefits of Workers with Disabilities*, October 2007.

34 Rodger W. Griffeth and Peter W. Horn, *Retaining Valued Employees* (Thousand Oaks, CA: Sage Publications, 2001).

35 Helen A. Schartz, D.J. Hendricks, and Peter Blanck, "Workplace accommodations: Evidence based outcomes," *Work* 26, n. 4, 2006, pp. 345–354.

36 Darlene Unger, "How Do Front-Line Supervisors in Business Perceive the Performance of Workers with Disabilities?" in Jennifer Todd McDonough et al. (eds.), *Employers' Views of Workplace Supports: Virginia Commonwealth University Charter Business Roundtable's National Study of Employers' Experiences with Workers with Disabilities, A Study Guide for Human Resource Managers*, May 2002.

37 John C. Bricout and Kia J. Bentley, "Disability Status and Perceptions of Employability by Employers," *Social Work Research,* 24, no. 2, June 2000, pp. 87–95.

38 DuPont de Nemours and Company, *Equal to the Task* , 1981; and *Equal to the Task II*, 1990.

39 Henrnandez and MacDonald, *Exploring the Bottom Line*.

40 Henrnandez and MacDonald, *Exploring the Bottom Line*.

41 Gary N. Siperstein, Neil Romano, Amanda Mohler, and Robin Parker, "A national survey of consumer attitudes towards companies that hire people with disabilities," *Journal of Vocational Rehabilitation*, vol. 22, 2005.

42 *Survey of Employment of Americans with Disabilities,* Kessler Foundation and National Organization on Disability.

43 *Elderly & Disabled Services in the US: Market Research Report*, IBISWorld, December 2011.

44 *Disabled and Elderly Assistive Technologies,* BCC Research, July 2011.

45 "The World Factbook," Central Intelligence Agency website, retrieved on August 13, 2012 (www.cia.gov/library/publications/the-world-factbook/rankorder/2001rank.html).

46 Estimates based on an analysis by Willian Erickson, Employment and Disability Institute, Cornell University of the 2010 American Community Survey (ACS) Public User Microdata Sample (PUMS).

47 Siperstein et al., "A national survey of consumer attitudes towards companies that hire people with disabilities," pp. 4–5.

48 *2010 Cone Cause Evolution Study*, Cone LLC.

49 Katherine Y. Williams and Charles A. O'Reilly, "Demography and diversity in organizations," in B.M. Staw and R.I. Sutton (eds.), *Research in Organizational Behavior*, (Stamford, CT: JAI Press, 1998), pp. 77–140.

50 Deborah Dougherty, "New Products in Old Organizations: The Myth of the Better Mousetrap in Search of the Beaten Path" (PhD dissertation, Sloan School of Management, MIT, 1987); Sara Kiesler, *Interpersonal Processes in Groups and Organizations* (Arlington Hts., IL: AHM Publishing, 1978); Jeffrey Pfeffer and Charles O'Reilly, "Hospital Demography and Turnover among Nurses," *Industrial Relations*, 36, 1987, pp. 158-173; and Marvin Shaw, *Group Dynamics: The Psychology of Small Group Behavior* (New York: McGraw-Hill, 1971).

51 Warren E. Watson, Kamalesh Kumar, and Larry K. Michaelsen, "Cultural diversity's impact on interaction process and performance: Comparing homogeneous and diverse task groups," *Academy of Management Journal*, 36, no. 3, 1993, p. 599.

52 Thomas Kochan, Katerina Bezrukova, Robin Ely, Susan Jackson, Aparna Joshi, Karen Jehn, Jonathan Leonard, David Levine, and David Thomas, "The Effects of Diversity on Business Performance: Report of the Diversity Research Network," *Human Resource Management*, 42, no. 1, 2003, pp. 3-21 (chrs.rutgers.edu/pub_documents/38.pdf).

53 Günter K. Stahl, Martha L. Maznevski, Andreas Voigt, and Karsten Jonsen, "Unraveling the effects of cultural diversity in teams: A meta-analysis of research on multicultural groups," *Journal of International Business Studies*, 41, 2009, pp. 690–709.

54 Scott Page, *The Difference: How the Power of Diversity Creates Better Groups, Firms, School, and Societies*, (Princeton, NJ: Princeton University Press, 2007).

55 Page, *The Difference*; Margaret Foegen Karsten, *Management, Gender, and Race in the 21st Century* (Lanthan, MD: University Press of America, 2006); Orlando C. Richard, Tim Barnett, Sean Dwyer, and Ken Chadwick, "Cultural Diversity in Management, Firm Performance, and the Moderating Role of Entrepreneurial Orientation Dimensions," *Academy of Management Journal*,

47, no. 2, 2004, pp. 255–266 (misweb.cbi.msstate.edu/~COBI/faculty/users/tbarnett/AMJ2004.pdf); and K.M. Thomas, *Diversity Dynamics in the Workplace (*Belmont, CA: Thomson Wadsworth, 2005).

56 Mark L. Lengnick-Hall, Philip Gaunt, and Jessica Collison, *Employer Incentives for Hiring Individuals with Disabilities* (SHRM Research, April 2003).

57 The eight groups are as follows: (1) qualified veterans, (2) recipients of long-term temporary assistance to needy families, (3) recipients of short-term temporary assistance to needy families, (4) recipients of supplemental nutrition assistance program, (5) residents of federally designated rural renewal counties, (6) referrals from a state vocational rehabilitation agency who have completed or are completing rehabilitation services, (7) ex-felons, and (8) SSI recipients. Source: "WOTC Eligible New Hires," U.S. Department of Labor website, accessed on August 14, 2012 (www.doleta.gov/business/incentives/opptax/eligible.cfm).

58 "WOTC Benefits Amounts," U.S. Department of Labor, retrieved on August 14, 2012 (www.doleta.gov/business/incentives/opptax/benefits.cfm).

59 "WOTC Eligible New Hires," U.S. Department of Labor website.

60 For the complete text of the Americans with Disabilities Act, visit the U.S. Department of Justice ADA website (www.ada.gov).

61 For the full text of the act, visit the U.S. Department of Education website (www2.ed.gov/policy/speced/reg/narrative.html).

62 The Federal Communications Commission website features an in-depth discussion of the Telecommunications Act on people with disabilities (transition.fcc.gov/cib/dro/dtftele.html).

63 The full text of the act is available on the United States Access Board website (www.access-board.gov/about/laws/aba.htm).

64 For more information, visit the USERRA page on the U.S. Department of Labor website (www.dol.gov/vets/programs/userra/).

65 Erickson, Lee, and Schrader, *2009 Disability Status Report: United States*, p. 39.

66 Bureau of Labor Statistics, "Table 1. Employment status of the civilian non-institutional population by disability status and selected characteristics, 2010 annual averages," *Persons with a Disability: Labor Force Characteristics—2010 (*U.S. Department of Labor, 2011).

67 *Survey of Americans with Disabilities, The ADA, 20 Years Later*, Kessler Foundation and National Organization on Disability, July 2010, p. 117.

68 *The ADA, 20 Years Later*, p. 56.

69 *The ADA, 20 Years Later*, p. 43.

70 Alexandra Kalev, Frank Dobbin, and Erin Kelly, "Best Practices or Best Guesses? Assessing the Efficacy of Corporate Affirmative Action and Diversity Policies," *American Sociological Review*, Vol. 71, August 2006, pp. 589–617.

71 For a guide to stakeholder engagement, see David Straus, *How to Make Collaboration Work: Powerful Ways to Build Consensus, Solve Problems, and Make Decisions* (San Francisco: Berrett-Koehler Publishers, 2002).

72 Susanne M. Bruyère, *Disability Employment Policies and Practices in Private and Federal Sector Organizations.* School of Industrial and Labor Relations Extension Division, Program on Employment and Disability, Cornell University, Ithaca, NY, 2000).

73 Susanne M. Bruyère, "A Human Resource Perspective on Implementing the ADA," 2011. Retrieved from the Cornell ILR School website (www.ilr.cornell.edu/edi/hr_tips/article_1.cfm?b_id=13)**;** *Lessons from the Field: Learning from What Works for Employment for Persons with disabilities, Before Senate Committee on Health, Education, Labor, and Pensions,* 2011 (statement of Deborah Dagit, Vice President and Chief Diversity Officer, Merck).

74 This brief case study is based on the author's experiences working with the company.

75 Kathy Gurchiek, "Diversity Best Practices: Built to Last," Society for Human Resource Management website, last accessed on August 21, 2012 (www.shrm.org/hrdisciplines/Diversity/Articles/Pages/BuilttoLast.aspx).

76 *Disability Employment 101*, Office of Special Education and Rehabilitative Services, U.S. Department of Education, 2007.

77 Kathy Krepcio and Patricia Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities: Spotlight on the Retail Trade Sector*, John J. Heldrich Center for Workforce Development, Rutgers, The State University of New Jersey, 2008; *Disability employment 101*, (Washington, D.C.: U.S. Department of Education, 2007); and Nadine Vogel, *The Best Practices of Employers of Choice for People with Disabilities*, SHRM Communications, accessible on the Insight into Diversity website (www.insightintodiversity.com/diversity-issues/896-the-best-practices-of-employers-of-choice-for-people-with-disabilities-by-nadine-vogel-.html).

78 "Employer Reference Desk," accessed on the Employer Assistance and Resource Network (EARN) website (askearn.org/refdesk).

79 See, for example, Regional Workshop on Promoting Disability Data Collection, *What is a Communication Strategy?* United Nations Economic and Social Commission for Asia and the Pacific.

80 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

81 Dianne L. Stone, and Adrienne Colella, "A model of factors affecting the treatment of disabled individuals in organizations," *Academy of Management Review*, 21, no. 2, 1996, pp. 352–401.

82 "Questions and Answers: The Americans with Disabilities Act and Hiring Police Officers," retrieved from the ADA website (www.ada.gov/copsq7a.htm).

83 Beth Loy, *Accommodation and Compliance series: Job Descriptions*, Job Accommodation Network, 2008 (askjan.org/media/ jobdescriptions.html).

84 Loy, *Accommodation and Compliance series: Job Descriptions*.

85 Loy, *Accommodation and Compliance series: Job Descriptions*; and Marjorie E. Karowe, Sheila D. Duston, & Susanne Marie Bruyere, *Pre-Employment Screening Considerations and the ADA,* Cornell University 2000 (www.ilr.cornell.edu/extension/files/download/Preempl_Screen.pdf).

86 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

87 *Employing Persons with Disabilities, 2010,* Society of Human Resource Management (www.shrm.org/Research/Articles/Articles/Pages/EmployingPersonswithDisabilities.aspx).

88 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*; *Disability Employment 101*, Office of Special Education and Rehabilitative Services, 2007 (www2.ed.gov/about/offices/list/osers/products/employmentguide/index.html).

89 Visit the U.S. Department of Education web page of state vocational rehabilitation agencies (wdcrobcolp01.ed.gov/Programs/EROD/org_list.cfm?category_ID=SVR) for contact information.

90 See the Career OneStop website (www.servicelocator.org/onestopcenters.asp) to find a nearby center.

91 The CARF website (www.CARF.org) offers a searchable database of service providers located throughout the United States who provide a wide range of employment services.

92 Susanne Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation," in *Disability & HR: Tips for human resource professionals*, Program on Employment and Disability, School of Industrial and Labor Relations-Extension Division (NY: Cornell University, 2002), retrieved on August 30, 2012 (www.ilr.cornell.edu/edi/hr_tips/list_1.cfm?c_id=60&view_all=true).

93 *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services, 2007 (www2.ed.gov/about/offices/list/osers/products/employmentguide/disabilityemployment101.pdf).

94 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation."

95 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation"; and Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

96 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

97 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

98 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

99 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

100 *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services.

101 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

102 *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services.

103 *Disability Employment 101*.

104 *Search Tactics Poll*, Society for Human Resource Management and Careerjournal.com, January 2001 (www.shrm.org/Research/SurveyFindings/Documents/Search%20Tactics%20Poll.pdf).

105 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

106 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation."

107 William Erickson, "A Review of Selected E-Recruiting Websites: Disability Accessibility Considerations," School of Industrial and Labor Relations, Program on Employment and Disability, Cornell University, September 2002 (digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1094&context=edicollect&sei-redir=1&referer=http%3A%2F%2Fwww.google.com%2Furl%3Fsa%3Dt%26rct%3Dj%26q%3D%2522a%2520review%2520of%2520selected%2520recruiting%2520websites%253A%2520disability%2520accessibility%2520considerations%2522%26source%3Dweb%26cd%3D1%26ved%3D0CEkQFjAA%26url%3Dhttp%253A%252F%252Fdigitalcommons.ilr.cornell.edu%252Fcgi%252Fviewcontent.cgi%253Farticle%253D1094%2526context%253Dedicollect%26ei%3D1UYlUKzcPOH66wHD14CYBg%26usg%3DAFQjCNHBcgr5t-LLdQ-0G6fCCN6bQoNrnA#search=%22review%20selected%20recruiting%20websites%3A%20disability%20accessibility%20considerations%22).

108 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation."

109 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*.

110 Susanne Bruyère, William Erickson, and Richard Horne, *Disability Employment Policies and Practices in U.S. Federal Government Agencies: EEO/HR And Supervisor Perspectives*, Presidential Task Force on Employment of Adults with Disabilities, School of Industrial and Labor Relations—Extension Division, Program on Employment and Disability, Cornell University, 2002; and Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

111 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

112 "Americans with Disabilities Act: Questions and Answers," U.S. Equal Employment Opportunity Commission and the U.S. Department of Justice, Americans with Disabilities Act website 2005, retrieved on August 13, 2012 (www.ada.gov/employmt.htm).

113 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

114 "Job Applicants and the Americans with Disabilities Act," U.S. Equal Employment Opportunity Commission, retrieved on February 23, 2012 (www.eeoc.gov/facts/jobapplicant.html).

115 L.P. Wright, "Twenty years of the Americans with Disabilities Act: Lessons learned from the EEOC's top 20 significant ADA victories," *New Jersey Labor and Employment Law Quarterly,* 32, no. 3, 2011.

116 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation"; and Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

117 "Employment Tests and Selection Procedures," U.S. Equal Employment Opportunity Commission, retrieved on April 23, 2012 (www.eeoc.gov/policy/docs/factemployment_procedures.html).

118 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

119 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation"; and Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

120 Wright, "Twenty Years of the Americans with Disabilities Act."

121 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation."

122 *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services.

123 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

124 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

125 "ADA Enforcement Guidance: Preemployment Disability-Related Questions and Medical Examination," U.S. Equal Employment Opportunity Commissions, October 1995, retrieved on February 23, 2012 (www.eeoc.gov/policy/docs/preemp.html).

126 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

127 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

128 Karowe, Duston, and Bruyere, *Pre-Employment Screening Considerations and the ADA*.

129 *All Aboard: Effective Onboarding Techniques and Strategies*, Aberdeen Group, January 2008.

130 *Implementing and Managing Onboarding Programs*, Corporate Executive Board, Learning and Development Roundtable and Recruiting Roundtable, 2006.

131 *All Aboard: Effective Onboarding Techniques and Strategies*, Aberdeen Group.

132 *All Aboard: Effective Onboarding Techniques and Strategies*, Aberdeen Group.

133 Bruyère, "Disability Nondiscrimination and Best Practices in Recruitment, Pre-employment Screening, Testing, and Orientation"; and *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services.

134 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*; and *Disability Employment 101*, U.S. Department of Education, Office of Special Education and Rehabilitative Services.

135 "A Technical Assistance Manual on the Employment Provisions (Title I) of the Americans with Disabilities Act," Equal Employment Opportunity Commission, 1992 (askjan.org/links/ADAtam1.html).

136 T. Powers, "Recognizing Ability: The Skills and Productivity of Persons with Disabilities," Employment Sector Employment Working Paper 3, Geneva: International Labour Office, 2008.

137 Stella E. Anderson and Larry L. Williams, "Interpersonal, Job, and Individual Factors Related to Help Seeking Processes at Work," *Journal of Applied Psychology*, 81, no. 3, 1996, pp. 282–296; and Fiona B. Lee, "When the Going Gets Tough, Do the Tough Ask for Help? Help Seeking and Power Motivation in Organizations," *Organizational Behavior and Human Decision Processes*, 72, no. 3, 1997, pp. 336–363.

138 Saralynn H. Allaire, Wei Li, and Michael P. LaValley, "Work Barriers Experienced and Job Accommodations Used by Persons with Arthritis and other Rheumatic Diseases," *Rehabilitation Counseling Bulletin*, 46, no. 3, April 2003, pp. 147-156.

139 David C. Baldridge and John F. Veiga, "Toward greater understanding of the willingness to request an accommodation: Can requestors' beliefs disable the ADA?" *Academy of Management Review*, 26, no. 1, 2001, pp. 85–99.

140 "Universal Design at Work," J. Mueller, Inc. website, retrieved August 28, 2012 (www.jlmueller.com/workplace_cases.html).

141 J. Mueller, Inc. website.

142 J. Mueller, Inc. website.

143 J. Mueller, Inc. website.

144 *Business Impacts of Flexibility: An Imperative for Expansion,* Corporate Voices for Working Families, with research by WFD Consulting, February 2011, p. 4.

145 "Job Coaching," America's Heroes at Work website, accessed August 28, 2012 (www.americasheroesatwork.gov/forEmployers/factsheets/jobCoaching).

146 *"Veterans and the Americans with Disabilities Act (ADA): A Guide for Employers,"* U.S. Equal Employment Opportunity Commission, 2011 (www.eeoc.gov/eeoc/publications/ada_veterans_employers.cfm).

147 "Veterans and the Americans with Disabilities Act (ADA)," U.S. Equal Employment Opportunity Commission.

148 "Veterans and the Americans with Disabilities Act (ADA)," U.S. Equal Employment Opportunity Commission.

149 "Veterans and the Americans with Disabilities Act (ADA)," U.S. Equal Employment Opportunity Commission.

150 "Ten Tips: Supporting a Veteran Family Member Returning to Work ," School of ILR, Employment & Disability Institute, Cornell University, 2011, retrieved on August 23, 2012 (www.ilr.cornell.edu/edi/dbtacnortheast/docs/ vets/ Vets_Disabilities_Family_Brief.pdf).

151 "Americans with Disabilities Act of 1990" (www.ada.gov/pubs/adastatute08.htm#12201h); and *"Veterans with Service-Connected Disabilities and the Americans with Disabilities Act (ADA): A Guide for Employers, 2011," The U.S. Equal Employment Opportunity Commission* (www.eeoc.gov/facts/veterans-disabilities-employers.html).

152 "Americans with Disabilities Act of 1990."

153 "Americans with Disabilities Act of 1990."

154 K.A. Dixon, Doug Kruse, and Carl E. Van Horn, "Restricted Access: A Survey of Employers about People with Disabilities and Lowering Barriers to Work," Rutgers, The State University of New Jersey: John J. Heldrich Center for Workforce Development, 2003.

155 Darlene E. Unger, "How do Front-line Supervisors in Business Perceive the Performance of Workers with Disabilities," in John Todd McDonough, Valerie Brooke, and Paul Wehman (eds.), *Employers' Views of Workplace Supports: Virginia Commonwealth University Charter Business Roundtable's National Study of Employers' Experiences with Workers with Disabilities* (www.worksupport.com/main/ empsgmanual.asp).

156 Susanne Bruyère, William Erickson, and Richard Horne, *Disability Employment Policies and Practices in U.S. Federal Government Agencies*, p. 24 (digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1065&context=edicollect).

157 Susanne Bruyère, William Erickson, & S. VanLooy, "HR's role in managing disability in the workplace," *Employment Relations Today*, Autumn 2000, pp. 47–66 (digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1119&context=edicollect).

158 Krepcio and Cooper, *An Overview of U.S. Corporate Practices in the Employment of People with Disabilities*; and *SHRM Survey Findings: Employing People with Disabilities: Practices and Policies Related to Accessibility and Accommodation*, Society for Human Resource Management, in collaboration with and commissioned by Cornell University ILR School Employment and Disability Institute, May 17, 2012.

159 Susanne Bruyère, William Erickson, and Sara VanLooy, *Accessible IT for People with Disabilities: HR Considerations*, Cornell School of ILR, Program on Employment and Disability, 2003 (digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1065&context=edicollec).

160 Bruyère, Erickson, and VanLooy, *Accessible IT for People with Disabilities*.

161 Darrell M. West, "State and Federal e-government in the United States, 2001," Inside Politics website, retrieved February 27, 2012 (www.insidepolitics.org/egovt01us.html).

162 Bruyère, Erickson, and VanLooy, *Accessible IT for People with Disabilities*.

163 Bruyère, Erickson, and VanLooy, *Accessible IT for People with Disabilities*.

164 *Survey of Employment of Americans with Disabilities,* Kessler Foundation and National Organization on Disability, p. 47.

165 David Thomas, "Diversity as Strategy," *Harvard Business Review,* September 2004, p. 3 (www.tedchilds.com/files/HBRDiversityStrategy04.pdf).

166 Thomas, "Diversity as Strategy."

167 Kate Nash, *Disabled Employee Networks: A Practical Guide,* Kate Nash Associates.

168 See, for example, the discussion of mentoring on the America's Heroes at Work website (www.americasheroesatwork.gov/forEmployers/factsheets/workplaceMentoring/).

169 *The ADA: 20 Years Later,* Kessler Foundation/National Organization on Disabilities, p. 46 (www.2010disabilitysurveys.org/octsurvey/pdfs/surveyresults.pdf).

170 America's Heroes at Work website.

171 Definition taken from "What is Flash Mentoring?" page on Flash Mentoring website, retrieved on February 27, 2012 (www.flashmentoring.com).

172 Adapted from America's Heroes at Work website (www.americasheroesatwork.gov/forEmployers/factsheets/workplaceMentoring/).

173 America's Heroes at Work website.

174 America's Heroes at Work website.

175 Dianna L. Stone and Adriene Colella, "A Model Of Factors Affecting the Treatment of Disabled Individuals in Organizations," *Academy of Management Review*, 21, no. 2, 1996, pp. 352-401.

176 See Darlene D. Unger, Paul Wehman, Satoko Yasuda, Leanne Campbell, and Howard Green, "Human Resource Professionals and the Employment of People with Disabilities: A Business Perspective," in Jennifer Todd McDonough, Valerie Brooke & Paul Wehman (eds.), *Employers' Views of Workplace Supports: Virginia Commonwealth University Charter Business Roundtable's National Study of Employers' Experiences with Workers with Disabilities,* 2002 (www.worksupport.com/main/empsgmanual.asp); H. Stephen Kaye, "Stuck at the Bottom Rung: Occupational Characteristics of Workers with Disabilities," *Journal of Occupational Rehabilitation*, 19, no. 2, 2009, pp. 115–128.

177 Ans De Vos, Koen Dewettinck, and Dirk Buyens, "Organizational Versus Individual Responsibility for Career Management: Complements or Substitutes?" (Vlerick Leuven Gent Working Paper Series 18, 2005) (www.feb.ugent.be/nl/Ondz/wp/Papers/wp_06_373.pdf).

178 J.H. Greenhaus, G.A. Callanan, and V.M. Godshalk, *Career Management*, (Dryden Press: New York, 1999), pp 45-56.

179 Greenhaus, Callanan, and Godshalk, *Career Management*, pp. 45-56; and Raymond A. Noe, "Is career management related to employee development and performance?" *Journal of Organizational Behavior*, 17, no. 2, 1996, pp. 119-133.

180 Julie Epstein, "Leadership Suite Designed for Managers from Diverse Groups: Leveling the Playing Field in the Workplace," UCLA Anderson School of Management website, posted February 6, 2012 (www.anderson.ucla.edu/x39418.xml).

181 America's Heroes at Work website.

182 B.G. Flynn, "The role of disability management programs in ADA compliance*,*" Cornell University, 2001 (www.ilr.cornell.edu/extension/files/download/DM_and_ADA.pdf).

183 Flynn, "The role of disability management programs in ADA compliance."

184 Flynn, "The role of disability management programs in ADA compliance."

185 *The ADA, 20 Years Later Survey*, Kessler Foundation and the National Organization on Disability, conducted by Harris Interactive, July 2010 (www.2010disabilitysurveys.org/pdfs/surveysummary.pdf).

186 *The ADA, 20 Years Later Survey*, Kessler Foundation.

187 Peter Linkow, "Is Your Culture Aligned with Diversity?" *Profiles in Diversity Journal*, July/August 2005.

188 Donald L. Kirkpatrick, *Evaluating Training Programs*, (San Francisco: Berrett-Koehler Publications, 1994).

189 *The Drivers of Employee Commitment*, WFD Consulting, 1998.

190 *The ADA, 20 Years Later Survey*, Kessler Foundation.

191 Sarah von Schrader, Valerie Malzer, William Erickson, and Susanne Bruyère, *Emerging Employment Issues for People with Disabilities: Disability Disclosure, Leave as a Reasonable Accommodation, Use of Job Applicant Screeners*, December 2011 (digitalcommons.ilr.cornell.edu/edicollect/1288). Based on findings from a survey disseminated through American Association of People with Disabilities (AAPD) and the Substance Abuse and Mental Health Services Administration (SAMHSA) networks and affiliates. N=169 for Not Apparent, 125 for Somewhat Apparent, and 206 for Very Apparent.

192 Von Schrader, Malzer, Erickson, and Bruyère, *Emerging Employment Issues for People with Disabilities*, 2011, p. 20.

193 For more on the form, see Appendix 3 on page xx or access it via the website of the U.S. Office of Personnel Management (www.opm.gov/Forms/pdf_fill/sf256.pdf).

194 Matthew W. Brault, *Review of Changes to the Measurement of Disability in the 2008 American Community Survey*, U.S. Bureau of Census, September, 2009.

195 Erickson, Lee, and von Schrader, *2009 Disability Status Report: United States*.

196 "Affirmative Action and Non-discrimination Obligations of Contractors and Subcontractors Regarding Individuals With Disabilities," Proposed Rule, Federal Register 76, no. 237, December 9, 2011 (www.gpo.gov/fdsys/pkg/FR-2011-12-09/html/2011-31371.htm).

197 Calculations by Sarah von Schrader, Cornell University, Employment and Disability Institute, using the data from Cornell and AAPD's Emerging Employment Issues for People with Disabilities Survey. Table includes responses of 116 individuals who disclosed their disability in their current or most recent position. For further information, visit the Cornell Digital Commons site (digitalcommons.ilr.cornell.edu/edicollect/1288).

198 Calculations by Sarah von Schrader, Cornell University, Employment and Disability Institute, using the data from Cornell and AAPD's Emerging Employment Issues for People with Disabilities Survey. Table includes responses of 473 individuals who disclosed in their current or most recent position. For further information, see Sarah von Schrader, Valerie Malzer, William Erickson, and Susanne Bruyère, *Emerging Employment Issues for Employees with Disabilities: Disability Disclosure Leave as a Reasonable Accommodation Use of Job Applicant Screeners* (digitalcommons.ilr.cornell.edu/edicollect/1288).

199 Sarah von Schrader and Susanne Bruyère, "Disability Disclosure in the Workplace: What Employers Should Know," webinar presentation on January 18, 2012, retrieved on March 7, 2012 (www.ilr.cornell.edu/edi/media/emprrtc/2012-01-18/2012-01-18_3724.pdf).

200 Richard Klimoski and Lisa Donahue, "HR strategies for integrating individuals with disabilities into the workplace," *Human Resource Management Review*, 7, no. 1, 1997, pp. 109–138.

201 Bruyère, Erickson, and VanLooy, "HR's role in managing disability in the workplace"; Dixon, Kruse, and Van Horn, "Restricted Access: A Survey of Employers about People with Disabilities and Lowering Barriers to Work"; and Lisa Schur, Douglas Kruse, Joseph Blasi, and Peter Blanck, "Is Disability Disabling in All Workplaces? Workplace disparities and corporate culture," *Industrial Relations*, 48, no. 3, 2009, pp. 381–410.

202 Bruyère, Erickson, and VanLooy, "HR's role in managing disability in the workplace"; Dixon, Kruse, and Van Horn, "Restricted Access: A Survey of Employers about People with Disabilities and Lowering Barriers to Work" and Schur, Kruse, Blasi, and Blanck, "Is Disability Disabling in All Workplaces?"

203 Lisa Schur, Douglas Kruse, and Peter Blanck, "Corporate culture and the employment of persons with disabilities," *Behavioral Sciences & the Law*, 23, no. 1, 2005, pp. 3–20.

204 Dana Wilson-Kovacs, Michelle K. Ryan, S. Alexander Haslam, and Anna Rabinovich, "Just because you can get a wheelchair in the building doesn't necessarily mean that you can still participate: Barriers to the career advancement of disabled professionals," *Disability & Society*, 23, no. 7, 2008, pp. 705–717.

205 Schur, Kruse, Blasi, and Blanck, "Is Disability Disabling in All Workplaces?"

206 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

207 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

208 Richard Klimoski and Lisa Donahue, "HR Strategies for Integrating Individuals with Disabilities into the Workplace," *Human Resource Management Review*, 7, no. 1, 1997, pp. 109–138.

209 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

210 Statement of Deborah Dagit, 2011 .

211 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

212 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

213 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

214 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

215 Schur, Kruse, Blasi, and Blanck, "Is Disability Disabling in All Workplaces-Workplace Disparities and Corporate Culture," *Industrial Relations*, Vol. 48, 3, July 2009.

216 Darlene D. Unger, "Employers' attitudes towards people with disabilities in the workforce: myths or realities?" in J. Todd McDonough, V. Brooke, and P. Wehman (eds.), *Employers' Views of Workplace Supports: Virginia Commonwealth University Charter Business Roundtable's National Study of Employers' Experiences with Workers with Disabilities*, 2002 (www.worksupport.com/resources/viewContent.cfm/156).

217 Schur, Kruse, and Blanck, "Corporate culture and the employment of persons with disabilities."

218 Schur, Kruse, and Blanck, "Corporate culture and the employment of persons with disabilities"; Schur, Kruse, Blasi, and Blanck, "Is Disability Disabling in All Workplaces?"

219 Klimoski and Donahue, "HR strategies for integrating individuals with disabilities into the workplace."

220 Wilson-Kovacs, Ryan, Haslam, and Rabinovich, "Just because you can get a wheelchair in the building doesn't necessarily mean that you can still participate."

221 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

222 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

223 Stone and Colella, "A model of factors affecting the treatment of disabled individuals in organizations."

224 Schur, Kruse, Blasi, and Blanck, "Is Disability Disabling in All Workplaces?"

225 *Disability Employment 101*, Office of Special Education and Rehabilitative Services.

226 Bruyère, Erickson, and Horne, *Disability Employment Policies and Practices in U.S. Federal Government Agencies*.

227 The Job Accommodation Network's (JAN) Disability Etiquette in the Workplace offers an especially comprehensive and useful overview of etiquette (askjan.org/media/employmentetifact.doc).

228 Vogel, *The best practices of employers of choice for people with disabilities*.

229 Estimates based on analysis of 2008 American Community Survey (ACS) Public User Microdata Sample (PUMS), by William Erickson at the Employment and Disability Institute (EDI) at Cornell University.

230 "Enforcement guidance: Unlawful disparate treatment of workers with caregiving responsibilities," U.S. Equal Employment Opportunity Commission, 2007 (www.eeoc.gov/policy/docs/caregiving.html).

231 "Enforcement guidance: Unlawful disparate treatment of workers with caregiving responsibilities," U.S. Equal Employment Opportunity Commission, 2007.

232 *Caregiving in the U.S., 2009*, National Alliance for Caregiving, 2009 (www.caregiving.org/data/Caregiving_in_the_US_2009_full_report.pdf).

233 *Caregiving in the U.S., 2009*, National Alliance for Caregiving.

234 *Family Caregivers—What They Spend, What They Sacrifice,* Evercare, Report of Findings, November 2007 (http://www.caregiving.org/data/Evercare_NAC_CaregiverCostStudyFINAL20111907.pdf).

235 *Caregiving in the U.S., 2009*, National Alliance for Caregiving.

236 *Caregiving in the U.S*., National Alliance for Caregiving and AARP, April 2004 (www.caregiving.org/data/04finalreport.pdf).

237 *Caregiving in the U.S., 2009*, National Alliance for Caregiving.

238 Hannah Rudstam, Wendy Strobel Gower, and Jamie Streeter Wilson, "Beyond Yellow Ribbons: Creating Inclusive Workplaces for Veterans with Disabilities" (http://ilr-edi-r1.ilr.cornell.edu/northeastada/docs/vets/Beyond_Yellow_Ribbons_text.pdf).

239 Terri Tanielian and Lisa Jaycox (eds.), *Invisible Wounds of War: Psychological and Cognitive Injuries, Their Consequences, and Services to Assist Recovery*, RAND Corporation, Center for Military Health Policy Research, 2008.

240 Mark Thompson, *Time*, June 5, 2011, retrieved on November 20, 2012 (http://nation.time.com/2011/06/05/the-disappearing-disorder-why-ptsd-is-becoming-pts/print/).

241 U.S. Bureau of Labor Statistics, Employment Situation of Veterans, BLS Spotlight on Statistics, May 2010.

242 Erickson, Lee, and von Schrader, *2009 Disability Status Report: United States*.

243 "Recruiting Disabled Veterans: A Primer ," United Cerebral Palsy website, accessed August 28, 2012 (affnet.ucp.org/ucp_channeldoc.cfm/1/17/11928/11928-11928/4649).

244 "Ten points for veterans to consider when returning to work with a disability," Texvet website (www.texvet.org/postings/ten-points-veterans-consider-when-returning-work-disability).

245 Hannah Rudstam and Wendy Strobel Gower, "Beyond Yellow Ribbons," Human Resource Executive Online website, 2011 (www.hreonline.com/HRE/story.jsp?storyId=533339171).

246 "Recruiting Veterans with Disabilities: Perceptions in the Workplace," Society for Human Resource Management and Employment and Disability Institute, Cornell University Poll, January 12, 2011,

247 Source: America's Heroes at Work, undated.

248 Rudstam and Gower, "Beyond Yellow Ribbons."

249 Source: America's Heroes at Work, undated.

250 Source: America's Heroes at Work, undated.

251 Source: America's Heroes at Work, undated.

252 Source: America's Heroes at Work, undated.

253 Source: America's Heroes at Work, undated.

254 Source: America's Heroes at Work, undated.

255 "*Veterans with service-connected disabilities and the Americans with Disabilities Act (ADA): A guide for employers," *The U.S. Equal Employment Opportunity Commission,* 2011.

256 Op. cit., Rudstam, Gower & Wilson.

257 "Convention on the Rights of Persons with Disabilities and Optional Protocol," United Nations, 2008 (www.un.org/disabilities/documents/convention/convoptprot-e.pdf).

258 "Convention on the Rights of Persons with Disabilities and Optional Protocol."

259 "Convention on the Rights of Persons with Disabilities and Optional Protocol."

260 "Convention and Optional Protocol Signatures and Ratifications," United Nations Enable website (www.un.org/disabilities/countries.asp?id=166).

261 Individual states that have previously signed the convention consent to being legally bound by it.

262 "UN Convention on the Rights of Persons with Disabilities falls short of Senate ratification," American Psychological Association, retrieved on January 1, 2013 (www.apa.org/about/gr/issues/disability/un-convention.aspx).

263 "Convention and Optional Protocol Signatures and Ratifications," United Nations Enable website.

264 "Convention in Brief," United Nations Enable website (www.un.org/disabilities/default.asp?navid=15&pid=162).

265 Patricia Thornton, "Employment Quotas, Levies and National Rehabilitation Funds for Persons with Disabilities: Pointers for Policy and Practice," 1998, retrieved on March 7, 2012 (digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=1083&context=gladnetcollect&sei-redir=1&referer=http%3A%2F%2Fscholar.google.com%2Fscholar_url%3Fhl%3Den%26q%3Dhttp%3A%2F%2Fdigitalcommons.ilr.cornell.edu%2Fcgi%2Fviewcontent.cgi%253Farticle%253D1083%2526context%253Dgladnetcollect%26sa%3DX%26scisig%3DAAGBfm2LRCeNU1NUWxR-Q-3to5UzMnnGuw%26oi%3Dscholarr#search=%22http%3A%2F%2Fdigitalcommons.ilr.cornell.edu%2Fcgi%2Fviewcontent.cgi%3Farticle%3D1083%26context%3Dgladnetcollect%22).

266 *World Report on Disability*, World Health Organization and World Bank, 2011.

267 Thornton, "Employment Quotas, Levies and National Rehabilitation Funds for Persons with Disabilities: Pointers for Policy and Practice."

268 Thornton, "Employment Quotas, Levies and National Rehabilitation Funds for Persons with Disabilities: Pointers for Policy and Practice."

269 Thornton, "Employment Quotas, Levies and National Rehabilitation Funds for Persons with Disabilities: Pointers for Policy and Practice."

270 Scott Thurm, "U.S. Firms Add Jobs, but Mostly Overseas," *Wall Street Journal*, April 27, 2012 (online.wsj.com/article/SB10001424052702303990604577367881972648906.html).

271 Stan Panis, "The Future of Work for People without or with Disabilities," Advanced Analytical Consulting Group, presentation on December 8, 2011.

272 "Design Definition and Principles ," Center for Universal Design, College of Design, North Carolina State University, 2007, retrieved from the Livable for a Lifetime website on March 21, 2012 (livableforalifetime.org/pdf/Universal%20Design%20Principles.pdf).

273 David Autor, Frank Levy, and Richard Murname, "The Skill Content of Recent Technological Change: An Empirical Exploration," *Quarterly Journal of Economics,* Vol. 4, 2003 (economics.mit.edu/files/569).

274 "WOTC Eligible New Hires," U.S. Department of Labor, 2012,

275 Survey of Employment of Americans with Disabilities

276 Testimony of J. Randolph Lewis of Walgreen Company to U.S. Senate Committee on Health, Education, Labor and Pensions, March 2, 2011, p. 1.

277 Testimony of J. Randolph Lewis of Walgreen Company.

278 Ronald L. Mace, The Center for Universal Design, College of Design, North Carolina State University, 2008.

279 Testimony of J. Randolph Lewis, p. 3.

280 Testimony of J. Randolph Lewis, pp. 4-5.

281 Occupational Safety and Health Administration, OSHA Pocket Guide, Worker Safety Series, Warehousing, 2004.

282 Interview with Jim Kaletta, President, Safety Management Solutions, April 20, 2012.

283 Rebecca Hastings, "Walgreens' Quest for Inclusion Yields Unexpected Results," Workplace Diversity Library – Case Studies/Best Practices, Society for Human Resource Management, October 2007.

284 Anyone can request a tour of the Anderson distribution center through a Walgreens website (webapp.walgreens.com/Outreach/servlet/source.Tag).

285 Hastings, "Walgreens' Quest for Inclusion Yields Unexpected Results."

286 Hastings, "Walgreens' Quest for Inclusion Yields Unexpected Results."

287 Brian O'Donnell, "Fear," Breaking the Odds blog, retrieved on April 17, 2012 (www.breaking-the-odds.com/2012/02/fear-pt-1.html).

288 John Burton, David Kirby, Ian Nelson, Brian O'Donnell, Kushal Parikh, and Kelsey Rozema, "Introduction," Breaking the Odds website, retrieved April 17, 2012 (www.breaking-the-odds.com/p/introduction_15.html).

289 Burton, Kirby, Nelson, O'Donnell, Parikh, and Rozema, from the blog Breaking the Odds, retrieved from Burton, John, Kirby, David, Nelson, Ian, O'Donnell, Brian, Parikh, Kushal, and Rozema, Kelsey, from the blog Breaking the Odds, retrieved from http://www.facebook.com/pages/Breaking-the-Odds/246515818734780?sk=info on April 17, 2012.

290 University of Illinois at Urbana-Champaign, *Transitional Disability Management Plan (TDMP),* retrieved on April 17, 2012 (www.housing.illinois.edu/Current/Halls/All%20Halls/Policies/Hallmarks%20Policies/Beckwith.aspx).

291 University of Illinois at Urbana-Champaign, *Delta Sigma Omicron*, retrieved April 17, 2012 (www.disability.illinois.edu/campus-life/delta-sigma-omicron).

About the Authors

Peter Linkow is senior director of diversity & inclusion at WFD Consulting, which has focused on formulating and implementing work-life and diversity & inclusion strategies for over 25 years. Previously, he was president of WFD; the CEO of two organizations serving people with disabilities; and a professor of management at Boston University, where he conducted research and published on strategy and strategic thinking. For the past 25 years, Linkow has consulted, written, and spoken globally on strategy, change management, quality, and diversity & inclusion. Among his papers and publications are "Measuring Diversity for Cultural Change" for The Conference Board, "Is Your Culture Aligned with Diversity?" for *Profiles in Diversity Journal*, The Conference Board's 2009 global research report *Meeting the Challenges of a Dispersed Workforce: Managing Across Language, Culture, Time, and Location*, and *Men and Work-Life Integration: A Global Study* for which he is senior author.

Linkow received his MBA from Harvard Business School, as well as graduate degrees in educational policy and psychology from Harvard and Indiana Universities respectively. He earned his BA from DePauw University.

Linda Barrington is managing director of the Institute for Compensation Studies (ICS) in the ILR School at Cornell University. ICS is an interdisciplinary initiative that analyzes, teaches, and communicates broadly about monetary and nonmonetary rewards from work. Barrington's work has appeared in the *Review of Economics and Statistics*, the *Journal of Economic History*, and the *Historical Statistics of the U.S.*, as well as in numerous business/practitioner reports. She is editor and contributing author to *The Other Side of the Frontier: Economic Explorations into Native American Economic History*. Her newest book, *Employment and Work*, co-authored with Susanne M. Bruyère, is one of eight volumes in the new *SAGE Reference Series on Disability: Key Issues and Future Directions*. She held several positions during her 10 year tenure at The Conference Board, including economist, special assistant to the CEO, research director, and managing director of human capital. Prior to The Conference Board, Barrington was on the economics faculty at Barnard College of Columbia University, during which time she published several articles on gender economics, poverty measurement, and economic history.

Dr. Barrington earned a PhD in economics from the University of Illinois, and a BS in economics from the University of Wisconsin.

Susanne M. Bruyère is currently professor of disability studies, the director of the Employment and Disability Institute, and associate dean of Outreach at the Cornell University ILR (Industrial and Labor Relations) School, in Ithaca, New York. Bruyère is also project director and co-principal investigator of numerous federally sponsored research, dissemination, and technical assistance efforts focused on employment and disability policy and effective workplace practices for people with disabilities, including the USDOL Office of Disability and Employment Policy National Technical Assistance, the Policy and Research Center for Employers on Employment of People with Disabilities; the Rehabilitation Research and Training Center on Employer Practice to Improve Employment Outcomes for Persons with Disabilities, and the Organizational Practices to Increase Employment Opportunities for People with Disabilities: The Power of Social Networks.

Bruyère is a past president of the American Rehabilitation Counseling Association, National Council on Rehabilitation Education, and Division of Rehabilitation Psychology of the American Psychological Association. She holds a doctoral degree in rehabilitation psychology from the University of Wisconsin-Madison. She is also a fellow in the American Psychological Association, a member of the National Academy of Social Insurance, and currently serves as an executive board member of the Division of Rehabilitation Psychology of the American Psychological Association, a past-chair of GLADNET (the Global Applied Disability Research and Information Network on Employment and Training), and a past-chair of the CARF (Rehabilitation Accreditation) Board of Directors.

Ivelys Figueroa is a research associate for WFD Consulting. Her research and professional interests focus on diversity and social justice change efforts within organizations. As a researcher for the PSC Project on CUNY & Race, she investigated racial disparities in the career trajectories of faculty and professional staff at the City University of New York (CUNY). She has also served as an administrator at New York University, directing an academic support and leadership development program for underrepresented students of color.

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Mary Wright is associate director at The Conference Board. Ms. Wright has significant experience linking the public and private sectors. She has a portfolio of responsibilities focusing on helping businesses better serve society. She serves as the director of The Workforce Readiness Initiative and as program director for the Business/Education Council. Her work also focuses on preparing new entrants for the 21st century workforce. She has been the project manager and co-author for many publications for The Conference Board, including *Are They Really Ready to Work; Ready to Innovate: Are Educators and Executives Aligned on the Creative Readiness of the U.S. Workforce*; *The Ill-Prepared Workforce*, a Gates grant to develop the case for businesses to invest in post-secondary credentialing programs; and *Employers and U.S. Public Education – Facilitating an Open Discussion about the Role of Business in U.S. Public Schools*. Her current work includes managing a series of creative conversations between artists and business leaders on workforce skills, crafting employer-ready material on improving employment outcomes for employees with disabilities, expanding the applications of The Conference Board Help Wanted On-Line Data base, and designing a national tool for measuring workforce readiness.

Ms. Wright is a Phi Beta Kappa graduate of Connecticut College with a degree in Urban Affairs and an MBA in public nonprofit management from Columbia University.

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