# Building a Disability-Inclusive Organization

## [Introduction]

**TRACIE DeFREITAS:**

Hello, and thank you for joining us today for this JAN Accommodation and Compliance Series webcast titled "Building a Disability-Inclusive Organization." My name is Tracie DeFreitas, and I serve JAN as the Director of Training, Services, and Outreach.

Today JAN is collaborating with our sister project, the Employer Assistance and Resource Network on Disability Inclusion, or EARN, to offer this important training. Ellice Switzer is our special guest presenter today. Ellice is an Extension Associate with the K. Lisa Yang and Hock E. Tan Institute on Employment and Disability, where she provides content development, training, and technical assistance for EARN.

As an Extension Associate, she provides national technical assistance and training on topics related to disability and employment and U.S. disability policy. Her areas of focus include employer practices to support workforce disability inclusion, demand-side strategies to improve employer engagement among disability service providers, and evidence-based practices to support post-school success for youth with disabilities. Ellice, thanks for joining me and for sharing your disability inclusion expertise with us today. I'm glad to have you here.

Before we get started, let's cover a few housekeeping items on the next slide.

First, if you experience any technical difficulties during this webcast, please use the question-and-answer option located at the bottom of your screen to connect with our tech team. You may also contact JAN at 800-526-7234 or use the live chat at AskJAN.org. That's A-S-K J-A-N dot O-R-G.

We do offer an FAQ that might answer some of your questions. See the login email you received for today for the FAQ link. You can also find it on the AskJAN.org webcast registration page.

Questions for presenters can be submitted today using the Q&A option. All questions will be gathered into a queue, and, time permitting, we will answer those at the end of the training.

The link to download PowerPoint slides can be found in the webcast login email that you received earlier today. The link is also in the chat, and it can be found at the AskJAN.org site at the training page. Look for this webcast title on the registration page, so for this event, you can go to that event title and find the link to the PowerPoint.

To access live captioning, use the closed caption option at the bottom of the webcast window, or you can view captions in a separate browser using the link that's shared in the webcast chat.

This presentation is being recorded, and we'll make it available on the AskJAN.org site and our YouTube page.

Finally, at the end of the webcast, we would like to know your feedback, so please do complete the evaluation. If you're seeking a CEU, the approval code will be provided after the webcast evaluation is submitted.

Now let's begin with our discussion topics. First, I'll share some brief information about National Disability Employment Awareness Month, or NDEAM, and then Ellice will talk about EARN's Inclusion@Work Framework for Building a Disability-Inclusive Work Culture. The Inclusion@Work framework offers strategies to help your organization create a disability-inclusive workplace culture and to meet diversity, equity, inclusion, and accessibility -- DEIA -- goals. She'll also talk about self-identification and disability disclosure. And then next, I'll share some insight on accommodation as an element of inclusion and direct everyone to some newly released JAN resources to help employers streamline the accommodation process during hiring. Finally, time permitting, we'll certainly spend some time answering some questions.

## [National Disability Employment Awareness Month]

So let's get started with some NDEAM-related information. Observed annually in October, National Disability Employment Awareness Month, or NDEAM, celebrates the contributions of America's workers with disabilities, and it showcases supportive, inclusive employment policies and practices. In recognition of the important role people with disabilities play in a diverse and inclusive workforce, the 2022 theme for NDEAM is "Disability: Part of the Equity Equation." The annual theme facilitates the planning of NDEAM events.

This year, the U.S. Department of Labor Assistant Secretary for Disability Employment Policy Taryn M. Williams. she really eloquently summarized NDEAM's importance in the following quote:

"A strong workforce is the sum of many parts, and disability has always been a key part of the equation. People with disabilities make up a wonderfully multifaceted group. By recognizing the full complexion of our community, we can ensure our efforts to achieve disability inclusion are in fact truly inclusive."

This sentiment, it really is illustrated in the 2022 NDEAM poster, so I want to share with everyone. Hopefully many of you have obtained this and are sharing it with your workforce. The poster is a rectangular shape with a black-colored chalkboard background overlaid with mathematical equations, and in the center of the poster, there is a -- on a diagonal -- a black rectangle bordered by small teal, yellow, and red rectangles. It features the theme "Disability: Part of the Equity Equation" along with an equation composed of several graphics. You see a circular photo with a woman in a wheelchair working at a computer, followed by a plus sign, followed by a square image of a woman who uses crutches viewing a document with a colleague, followed by an equals sign, followed by a lightbulb icon. So there's that mathematical equation, and it all comes together there.

Everyone can access the poster and various NDEAM tools and resources by visiting DOL.gov/ODEP. So there really are some great NDEAM tools there that everyone can take advantage of to really facilitate these activities throughout the month. So I encourage you to do that. Okay. That was brief, quick. Ellice, I'm going to yield the webcast floor to you so you can talk to us a bit about that Inclusion@Work framework.

## [ODEP Projects]

**ELLICE SWITZER:**

Great. Thank you so much, Tracie, for that nice introduction, and thank you so much to the JAN tech team, who are doing an excellent job supporting us today. I really appreciate it. So I would just like to mention that I am a middle-aged-ish white woman with brown curly hair wearing a maroon top and glasses.

So I first wanted to take a moment to acknowledge our funder. Tracie mentioned that JAN and EARN are what we call sister projects or sister grants, and we are both funded by the Office of Disability Employment Policy and the U.S. Department of Labor, which is a nonregulatory organization, department, that promotes policies and coordinates with employers at all levels of government to increase -- all levels and government -- to increase workplace success for people with disabilities. The mission of ODEP is quite simple. It's to develop and influence policies that increase the number and quality of employment opportunities for people with disabilities. So we are happy as the ODEP-funded -- two of the ODEP-funded technical assistance centers to help them with that mission.

Next slide.

So, you are already aware that EARN, or the Employer Assistance and Resource Network on Disability Inclusion, and JAN, the Job Accommodation Network, are both ODEP-funded technical assistance centers, but we also want to make sure you are aware of our other -- I guess we have a third sister. PEAT, the Partnership on Employment and Accessible Technology is another technical assistance resource that's available to you.

Next slide.

Okay. So hopefully I can get you all to indulge me for just a minute and respond to a quick poll for us. So we are curious to know what aspects of workplace disability inclusion are you most curious about? So are you most curious about finding qualified candidates, curious about providing reasonable accommodations, creating a culture of inclusion, or promoting retention and advancement, or all of the above. Go ahead and take a minute and answer the poll if you would.

[Silence]

How are we doing with the response rate? It's not showing it to me. Most have answered? Ok let's go ahead and close it out and see what people had to say.

Okay. All of the above. Right answer; right? But no, it's okay if you are particularly curious about one area. So providing reasonable accommodations would definitely be the second most-selected category there that people are curious about. I would say that's pretty common. Especially with employer audiences, people tend to get a little focused in that area. And, lucky for you, we have Tracie here with us today, who's going to spend a little bit of extra time talking about how accommodation fits into the Inclusion@Work framework. But the framework that we're going to talk about today is really designed to assist with all of these things: finding qualified candidates, providing reasonable accommodations, creating cultures of inclusion, and promoting retention and advancement of people with disabilities.

Next slide.

## [Inclusion@Work Framework]

So on this slide is a graphic that represents the Inclusion@Work framework. There are seven elements to the framework, or themes. So the first is lead the way, then build the pipeline, then hire and keep the best, ensure productivity, communicate, be tech savvy, and measure success. So these themes are organized as sort of like pie pieces in a pie or maybe pieces in a game of Trivial Pursuit more like. But they are organized around a circle, and in the center of the circle, it says the "Inclusion@Work framework, A Framework for Building a Disability-Inclusive Organization."

And so I wanted to share with you a bit about how the framework was developed. So EARN and ODEP both work very closely with organizations that would be considered leaders in the field of disability inclusion, both in the public and private sectors. And so the thematic elements of the framework were really developed in collaboration with these thought leaders in the space of disability inclusion and looking at what are they doing within their own organizations to create a culture of inclusion and how can those things be replicated?

So, you know, most of these strategies, I think it is important to point out, are simple. So even though I'm offering you what may seem like a very complicated seven-thematic-area process for disability inclusion, a lot of the things you're going to find in here are readily achievable, even by very small businesses, and most often these strategies are going to be very low-resource as well. Low or even no cost.

Next slide.

### [Lead the Way]

So diving right in to "Lead the Way." So there's a reason why "Lead the Way" comes first, and it's because leadership commitment to a disability-inclusive workplace culture is probably the first and perhaps the most important element of creating cultures of inclusion. So, there is no substitute for leadership commitment.

So it's really, really important for there to be at least one, if not multiple, champions for disability-inclusive initiatives within the organization, within the executive level of the organization. Very often we see corporate executives who will come out, for example, and share information about why disability inclusion is important to them, what is it about their own experience that makes disability inclusion important. So sometimes I heard businesses share information about executives who actually disclose disabilities as part of expressing their commitment to disability inclusion or talk about disability among family members or why it's a personal priority to them.

It is also important, I think, that leadership of organizations make it clear that it is not a nice-to-do, it's a need-to-do; right? Disability inclusion is actually a business imperative. And I can tell you that all of the companies that I work closely with who have instituted really robust disability inclusion programming have found that to be a case, that it's actually a business imperative, that they are solving business-related problems by doing a better job of reaching out to hiring and retaining qualified people with disabilities.

So it's also, as part of the expressing the commitment, really important that you establish inclusion as a corporate value. So disability should be reflected in all discussions about corporate values, in all value statements, anywhere you're talking about cultural values, workforce values, disabilities should be a prominent part of that. And just overall communicating commitment to inclusion regularly. So it's not something that can be done once. It's something that has to be sort of baked into the culture overall within an organization and something that's brought up on a regular basis and emphasized in lots of different ways.

Next slide.

### [Build the Pipeline]

So outreach and recruitment. Of course establishing effective outreach efforts is a really, really critical piece to building the pipeline of qualified candidates with disabilities.

So this can take a lot of different forms. Very often this involves targeted outreach to community-based organizations that serve people with disabilities, working collaboratively within state vocational rehabilitation systems. Often the leaders in this space have personnel that spend time joining or participating somehow with consortia of organizations that are focused on disability inclusion in the workplace or membership organizations that are focused on disability inclusion in the workplace.

And also reaching out to colleges. If there are colleges that you typically recruit from, have you reached out to the disability services offices on those campuses? And the reason why we suggest that you do that is because student disability services and career services are usually pretty disconnected from one another.

But that said, we should also be letting our typical sources of recruitment know that we are really interested in having a robust talent pipeline that includes qualified people with disabilities. So if you do have on-campus relationships where you are -- places you are recruiting from on a regular basis, do they know that you're interested in also meeting with students with disabilities? If you have connections within Workforce Development, private recruiting firms, what have you, are they aware of your desire to make sure that your talent pipeline includes people with disabilities? So that's a really important aspect of effective outreach. And establishing a pipeline of qualified candidates with disabilities at all levels.

So, for those of you who are federal contractors, you know that you are already required to do this; right? Or you're required to try. So in your affirmative action planning, you are required to try to achieve a certain amount of people with disabilities in each job category identified on the EEO-1. And why? Why is that a rule? It's a rule because when those -- the rules under that section, section 503 of the Rehabilitation Act were being developed, we wanted to make sure -- not we but they -- they wanted to make sure that people with disabilities weren't being overrepresented in lower pay grades of the organization or less-skilled positions. That's okay. It is completely okay. But there should be an effort to make sure that people with disabilities are represented at all levels, whether or not you are a federal contractor; right? This is a really good and important thing to do.

Next slide.

### [Hire (and Keep) the Best]

Hiring and keeping the best. So once you've done all that work to get people in the door, you have developed your relationships, you've refined your talent pipelines, it's really important to think about then what is the applicant experience in the process of being hired?

So first of all, of course, ensuring accessibility is a key piece of this process. If your hiring platforms are inaccessible to people with disabilities from a technological perspective, that's going to represent a barrier; right? So you may attract a candidate with a disability who is interested in applying, and then they may run up against some barriers that they're not able to overcome.

So the other aspect of this is making sure that a person has an ability to request an accommodation very clearly and easily. So if you are using an applicant tracking system that's linked in your website, there should be information right there about how to request an accommodation if one is needed. The caveat being make sure it is actually somebody's job to respond. So I think one of the frequent complaints that I have heard about this is that often a business will put a phone number up or put an email address up, if you need an accommodation, please contact this person, and then no one ever gets a response. So make sure you don't do that. It's got to be somebody's designated responsibility to then engage with that person and see if a reasonable accommodation can be provided.

It's also really important in terms of retaining people with disabilities that you think about access to career development opportunities for those folks. So it's really not enough to get people in the door if you're losing them on the back end because there are no opportunities. It's also really important that people with disabilities experience the same type of performance management feedback that everyone else experiences; right? Because that is a growth opportunity that people with disabilities are given challenge assignments just like a non-disabled peer.

And so often that needs to be sort of a formalized process where, you know, it is somebody's role to be looking at that. To be disaggregating employee data and say, "Hey, how are we doing here? Are we doing a good job providing opportunities for people with known disabilities to progress and advance in their careers?" And of course one way of knowing that is by looking at your representation within the management and upper levels of your organization. So implementing policies that support advancement and retention of people with disabilities is another thing that is very important.

And again, this is just being intentional. So for example, if you have an organization where people who work part-time are never or rarely considered for advancement opportunities, you need to think about whether or not that might disproportionately impact employees with disabilities. So we don't know, that's why data is so important; right? And we'll talk about that in a moment. But it is possible that policies like -- or the lack of policies around making sure people who work part-time are considered for advancement, making sure that people who are fully remote -- right? Because that's something that now a lot of us are -- are considered for advancement. Being intentional about considering all of those things are going to help make sure that people with disabilities are not overlooked for opportunities.

And by the way, it's going to help make sure that other perhaps marginalized populations in your workforce are not overlooked for opportunities as well. For example, women with caregiving responsibilities often fall into those categories of remote workers or part-time workers. So overall, it's just a good practice.

Next slide.

### [Ensure Productivity]

So ensuring productivity, reasonable accommodations. And again I'm going to turn this topic over to Tracie in a few minutes, and she's going to share information in a little more detail for you about this topic. But my favorite thing about this aspect of the Inclusion@Work framework is the title: Ensure productivity. And there's a reason why it is called that. It's called that because accommodations are simply productivity tools. I don't think they're often thought of that way, but that's what they are.

An accommodation is something that I might receive that helps me to do my job better and more productively. To meet the essential functions of my position. So, you know, after hire, it's important to consider accessibility needs as well as during the hiring process or accommodation needs. People may not always disclose during the hiring and onboarding process for multiple reasons. People may acquire a disability well into their employment tenure, of course. So it's really important that you ensure awareness of and access to reasonable accommodation or the request for a reasonable accommodation.

So the way that a lot of organizations do this is by creating either a centralized accommodation fund or centralized accommodation processes or both. So, you know, that's one way to ensure that these types of decisions or the funding for any necessary accommodations are sort of taken out of the hands of local managers and standardized so that every employee in the organization has the same experience.

Next slide.

### [Communicate]

Communication. So it's one thing to do all of these wonderful things, but it doesn't really help unless people are aware of it; right? So it's really important to communicate any efforts around making your workplace more disability-inclusive. So that people can, number one, avail themselves of those opportunities -- right? -- or supports if they need them. But also, you know, externally communicating so that people with disabilities may be more likely to be attracted to applying if they see you as a leader in the disability inclusion space; right?

That means making sure if you've got any disability-specific initiatives like internship programs or hiring programs, that you've got that very prominently displayed on any external-facing communications or career pages. And that also this is something that is talked about on a regular basis, and that if I'm a people manager, I am receiving regular communication about expectations of me in regard to disability inclusion and also policies and procedures.

Next slide.

### [Be Tech Savvy]

Being tech savvy. So more and more we live in the digital space, and that has some very specific, you know, implications for accessibility. So, it's important to regularly review any systems that you use in your hiring process for accessibility. So that could be accessibility to screen reading technology, for example. It could be, you know, for example, maybe you have an onboarding program that's really heavily reliant on video. Are those videos captioned? is there an audio-described version of those videos? So it could be your applicant tracking system itself; right? If you contract out and someone does -- for an ATS, is that accessible? And you can ask how do you ensure that these platforms are accessible to people with disabilities?

So all HR systems, once a person is hired, this is very important. So a person with a disability should be able to access, for example, here at Cornell, we use Workday. And I have no idea about Workday's accessibility features myself personally, but I would assume and I would hope that if I have a colleague -- and I do have colleagues who are blind -- that they are able to independently use Workday in the same manner that I am able to use Workday; right? So HR systems are very important in terms of the employee experience and whether or not that employee actually feels a sense of belonging, and it's a great way of making sure that that employee knows that they are valued.

And then if you're implementing any plans to procure or use any type of information and communication technology, you know, making sure that that is accessible. I think, you know, we'll probably be updating the Inclusion@Work framework in the next few months, and I think one of the things that we will add that's currently missing here is we're going to talk more about artificial intelligence or the use of AI in recruiting and hiring processes.

So it's becoming more and more common, and I don't think that employers are always fully aware of the ways in which use of AI could potentially unintentionally screen out qualified candidates with disabilities. So if you're using any type of AI in recruiting -- it could be something embedded in your applicant tracking system. It could be some type of pre-employment testing. There's all sorts of gizmos and gadgets and programs out there. Could be chatbots; right? Maybe you have a chatbot that you're using. Think about whether or not they're, A, accessible, B, what algorithms are they using? To whatever extent you're able to know that, because a lot of the time it's proprietary. But to whatever extent you can know how is this technology screening people in or out to make sure that people with disabilities are not being screened out.

And also if you're using social media. In particular, if you are using social media in recruiting, you need to evaluate the accessibility and the effectiveness of social media in making sure that people can access that easily.

Next slide.

### [Measure Success]

So collecting and using data is the final element of the Inclusion@Work framework. It's a very important element. It's terrific to do all of these things. Probably not going to achieve the outcomes that you're hoping to achieve unless there are metrics created to determine whether or not your benchmarks are being met. So that could look different for different organizations, but certainly metrics around hiring -- recruitment, hiring, advancement, how many people with disabilities applied? How many people with disabilities were interviewed? How many of those people were converted to hires?

Some organizations, either because they are asked to or because they just do, look at things like pay equity analysis; right? Have you done a pay equity analysis to see if people with disabilities are being compensated accordingly? Caveat about that, if you're going to do a pay equity analysis, be prepared to act on the results; right?

So the major benefit of course to gathering data is to use it to make a data-informed decision. So if you have some hiring initiatives in place, for example, and you're looking at your data and your data is showing, "Wow, this really is not yielding the results we had hoped," or you have a recruitment relationship, and you're able to see that the recruitment relationship is not yielding the results you had hoped, then you are able to make adjustments as necessary.

And in terms of access to training, what that refers to is making sure not just that personnel have access to training on disability and disability inclusion in the workplace, but that there's some accountability attached to that. So there's an expectation around training on disability inclusion or training on other policies and procedures in the workplace around disability for those who manage people and that that is tracked and accounted for.

And the other thing that is really important -- and I'll talk more about this in a moment -- but that encouraging that voluntary self-identification of a disability. Because it is very difficult to measure how well you're doing as disability-inclusive workplace if you don't know who in your workplace has a disability. And because many, many disabilities are nonobvious -- right? -- and many, many people may be in your workforce and have a disability but have not requested an accommodation, you may not be aware, for example, that you have a higher turnover rate among people with disabilities in a certain department, for example, because you didn't know that those people existed there in the first place. It is important to encourage that self-identification, and I'll share some more detail about that in a second.

Next slide.

## [Self-identification and Disclosure]

Okay. So we're going to digress a little bit here to talk about the importance of self-identification. Self-identification, as both part of the result of the Inclusion@Work framework; right? So if you have disability-inclusive workplace, you're more likely to get people who want to self-identify as a person with disability and aspects of the framework are really dependent -- successful outcomes are dependent on that voluntary self-identification. And I'm going to talk about disclosure of a disability, which is a different thing, and it's really, really important to understand the differences between self-identification, or self-ID for short, and disclosure.

Next slide.

So what is self-identification? So any of you again who may be federal contractors or federal agency employers are going to be very familiar with the process of self-identification. Some of you may even work for companies -- myself for example, working at Cornell University, which is -- most large research universities are federal contractors -- I regularly every -- at a minimum at hire and then every few years thereafter, federal contractors need to ask employees to voluntarily self-identify. You may see that in job applications and have that embedded in your job application, but basically what that is asking, it is confidential, although not always anonymous, process -- and that's a very important distinction -- where people can notify an employer that they are a person with a disability for the purposes of data collection and reporting and/or measurement and analysis only; right?

So, if you're a federal contractor, there's a lot of rules and regulations around this. This data has to be kept in a separate data collection file. It has to be completely separated from all personnel materials. Hiring managers and supervisors, hiring authorities, are not privy to this information. It's specifically for data collection and analysis purposes only.

Next slide.

So then what is disclosure? What's the difference; right? So disclosure is something that happens when a person with a disability decides to share that they have a disability, typically with a supervisor, although sometimes with human resources or another colleague or for whatever reason, but they share that they have a disability for a specific purpose; right?

So usually that happens because someone might need to make an accommodation request, and the important thing to know about this is that a person is not qualified for a reasonable accommodation under the Americans with Disabilities Act unless they have disclosed a disability. They have to disclose in order to engage in that interactive dialogue around that accommodation request.

So but sometimes people might disclose a disability because they want to be part of an affinity group, some type of disability affinity group. Or it could be a part of personal storytelling, you know, I feel better understood. So for example before we got on this webinar today, I explained to Tracie that I often turn my camera off when I'm not speaking, because I have a neurological condition that makes it difficult sometimes for me to hold my head in the camera. So it's a simple way that I self-accommodate, but I like to tell that story sometimes because it helps people understand me better in the workplace, so they don't think I'm disengaged when I turn my camera off. And sometimes people will disclose as part of the company's communication plan around disability inclusion.

So I mentioned there are examples of leaders in organizations where they have come forward as champions of disability inclusion initiatives and shared their own personal stories about disability. But the most important thing to know here is the difference between self-ID and disclosure.

And so one of the things -- and it's really especially important for -- it is very important for employees and employers to know the difference but especially for employees. And I'll tell you why. For one reason, if people believe that if they respond to a self-ID campaign to voluntarily identify as a person with disability, if they believe that that is equal to a disclosure of their disability, it may trigger a whole bunch of reasons why they might hesitate; right? And so you might get a less of a response on your self-ID campaign if employees don't know the difference.

So the flip side of that is sometimes people will fill out this self-ID form, and they'll mistakenly think that that means they have disclosed their disability to their supervisor, when in fact their supervisor has no idea. So it's really important that people in the workforce have good, accurate information about the difference between disclosure and self-ID and that employers themselves have a great grasp on that.

Next slide.

So I mentioned some of those reasons why people might be hesitant to self-identify. A few years ago now, several of my colleagues did some research around this with individuals with disabilities, asking them, you know, "What reasons might you hesitate to disclose a disability or to self-identify?"

So first of all, they want to know are they safe to do so? What kind of repercussions might this have for them? Is it going to impact their relationships at work? Is it going to impact how they engage with their supervisor? And what about career growth? If people know that I have a disability, does that mean that I'm going to be overlooked for stretch assignments and growth opportunities in the future? Will people not believe that I'm capable of performing my job anymore? And will I be treated differently? Will I be resented by my coworkers, for example, if I ask for a reasonable accommodation?

So these are all reasons why people may not choose to self-ID or disclose, and if you want to have a successful self-ID campaign in order to measure your progress on disability inclusion, you're going to have to help people overcome some of those barriers, and one of the best ways to help them overcome that is by creating a sense of trust and safety and just overexplaining your reasons for wanting to collect that voluntary self-ID information.

Next slide.

So I really -- I like this quote about the benefits of self-identification.

"Self-identification can provide organizations with information that can be leveraged to allocate resources and support candidates who fall into an underrepresented category. The information can impact access to benefits, training, and mentorship. Leaders can use the data to help launch or expand diversity and inclusion initiatives that can help advance employee engagement and aid in retention efforts."

This is really a great "why" for an employee with a disability. Why should I disclose or self-ID? What is in it for me; right? This quote really captures the "What's in it for me?" piece of that.

Okay. So now I'm going to turn it back over to Tracie for a few moments, and she's going to talk a little bit more about accommodation and inclusion.

## [Accommodation & Inclusion]

**TRACIE DeFREITAS:**

Thanks, Ellice. Thanks for sharing those seven core components of a disability-inclusive workplace. Now I'd like to expand on one of the core components that Ellice mentioned, ensuring productively through reasonable accommodations. We saw when we took that poll that I think it was 31% of people were seeing reasonable accommodation as perhaps a barrier or something they wanted to know more about. So I'm going to expand on that a bit.

An inclusive workplace, it certainly is one that fosters a culture of accommodation. So we know that accommodations can improve employee productivity, morale, retention of qualified workers, so promoting a culture of accommodation, it should be part of your DEIA efforts. And that means that the culture is perhaps flexible and supportive, it should be solution-focused, and it should really aim to provide effective and innovative accommodation solutions that enable a diverse and inclusive workforce to contribute and to be productive and to definitely feel valued. So by providing reasonable accommodations, businesses can really ensure that all employees, including employees with disabilities, have what they need to perform their best at work.

So that's really -- those are the things we want to be thinking about. There are various ways that employers can promote a culture of inclusion. So what can they do? Certainly inform all employees -- including supervisors, managers, employees, staff, everyone in the workforce -- about your accommodation policies and procedures and also rights and responsibilities. And not to do this reactively but proactively. Informing all employees beyond simply posting an equal opportunity poster. It can really benefit businesses by creating a knowledgeable and inclusive workforce, that it's really informed and recognizes and respects the positive effects of reasonable accommodations. So keep everybody in the know.

Also it's important to create a safe space for self-identification and disability disclosure. It's important to be aware of how challenging it can feel for someone to ask for an accommodation and disclose their disability. So you really want to do your best to create what would be a welcoming and safe environment for a person with a disability to make their accommodation needs known without concerns of negative repercussions for doing that. So you want to create that safe space for disclosure, and it's essential to the success of the accommodation process, too. One way to do that is to ask, "How can I help?" We say that a lot at JAN. It's a way of really creating that safe space and letting people know that it's okay to ask for what they need to do their best work. So approach maybe the situations with that "How can I help?" attitude.

Something else you can do is train human resources and people leaders to recognize and respond to accommodation requests and to be solution-focused when they're engaging in the accommodation process. These key employees, they'll have a significant impact on job performance success rates if they're properly informed and trained and equipped with the information and tools they need to provide accommodation. They need to know what to do, how to handle situations, and how to work together with employees who ask for accommodations.

Also be flexible and creative when you're exploring accommodations. Of course accommodations, it can be any modification -- a policy change, equipment that's provided. There really is no limit to what people can come up with. And so it's important to be open and open to innovative ideas around making adjustments at work. Opportunities for success about when we're open to kind of pushing the limits of what can be done and people can do. So try to be flexible and creative and work together in doing that, in exploring those solutions, and know that you're not alone in the process.

Resources like JAN and EARN and PEAT also can help. So if you're stuck and you're just not really sure what to do, or you're just looking for some additional ideas and resources, contact one of our projects to get more information and help on exploring accommodation ideas. These types of accommodation practices, they promote inclusion for workers with disabilities and also that culture of accommodation. So these are just some ideas. I'm sure there are lots of others that could certainly be implemented.

Now I want to pivot somewhat to focus on inclusive hiring and accommodations. Businesses should really assess whether their hiring practices facilitate or impede the hiring of qualified workers with disabilities. Inclusion starts at the welcome mat, so to speak. To build an inclusive workplace, your organization really has to ensure that all qualified people with and without disabilities can participate in that hiring process. Your organization's hiring and onboarding processes, they must be inclusive of and accessible to people with disabilities.

What does inclusive hiring mean, though? It's something that happens at every stage of the hiring process. It's where candidates with disabilities have equal access in recruiting, in application, interviewing, testing, onboarding. And it's where reasonable accommodations may be needed to sort of ensure that access is there and that there's an equal opportunity to apply for a job. So you really want to keep that in mind in those early stages.

Ellice offered some insight on this topic as part of that Inclusion@Work framework, so I'm not going to talk at length about it, but I do want to share that JAN has recently released some new resources and new strategies around facilitating the accommodation process and inclusion by streamlining the accommodation process during hiring. There are some things that employers can keep in mind when processing hiring accommodation requests. It can be kind of a tricky place, I think, for a lot of employers.

So in general, of course keep in mind that it's the applicant who must start the accommodation process by making that request, but an applicant may not know how to make a request for accommodation or maybe what to expect once they do. And so I think it's -- there are some things, strategies, to kind of keep in mind as part of that process. Some best practices, if you will. For example, businesses can show a commitment to inclusion by making it easy for applicants to request accommodations for hiring. So don't make it so that they have to seek out the process or question what they need to do.

One way to do this is to include a reasonable accommodation statement with your job announcements, your applications, on interview letters. A reasonable accommodation statement can also be part of an equal opportunity statement. It's okay to do that. On the slide I offer just an example. "XYZ Employer is committed to the full inclusion of all qualified individuals. As part of this commitment, XYZ Employer will ensure that persons with disabilities are provided reasonable accommodations for the hiring process. If reasonable accommodation is needed, please contact a specific person with a specific contact.” And more than one contact as well. Ellice mentioned that earlier too. It's important to make sure people know how to reach out to those who can provide the accommodation they need for the hiring process.

Also, hiring accommodation requests really should be processed as quickly as possible. You want to avoid delays and appoint someone to handle accommodation requests quickly. There should be more than one way to contact the person. For example, like I mentioned, by phone, through email.

And of course even when information is provided about how to request accommodation, we know sometimes applicants will show up to an interview and make an accommodation request at that time. When that happens, you still want to try to provide the accommodation. Interviewers of course should be trained to handle this type of situation so that they're prepared and know what to do when faced with that situation.

To provide effective accommodations for the hiring process, employers can use a similar approach to the one they use for employees. You know, the steps are pretty much the same, but there are some things that you want to keep in mind during that hiring process. For a variety of reasons, employers really need to aim to minimize the amount of confidential medical information that's received from applicants and candidates. So for example some employers don't even require medical documentation at the application stage. Instead they might just talk with the applicant about what's needed and why or might just be happy with a simple note from an appropriate healthcare provider or other provider that just kind of establishes the disability and the need for the accommodation without any specific details. So I think it's important to really kind of make sure you're keeping that limited.

And this is where some of JAN's new resources may help. We've recently released several resources that can help employers in streamlining that accommodation process. So on this slide we have "Hiring Process Reasonable Accommodation Flowchart." This is a flowchart that walks you through that entire process of looking at accommodations, considering accommodations for the hiring process. We offer a few sample forms that can be helpful. One related to medical inquiries related to a response to an accommodation request so that it limits -- you're limiting that request for information. Others related to a sample reasonable accommodation request form, where if you want to document that type of request, you can certainly go ahead and do that. And then we offer some reasonable accommodation statements, sample statements that you can use or customize to meet your needs. And finally, this isn't a new resource, but I find it to be very helpful. "Streamlining the Interactive Process when Accommodating Job Applicants" is another great resource that we have available.

 Also, of course, EARN offers some great resources too that can be useful, particularly for the hiring process, so you do want to take a look at those too at AskEARN.org. Here we have "Encouraging Applicants with Disabilities: Job Descriptions and Announcements." Some information around measuring success, accountability and self-identification and also some information around online recruitment and outreach. So these are just some examples to consider. So great resources that everyone can certainly take advantage of.

So if -- in fact we've shared a lot of information today. We've sort of hit just the highlights of that -- the Inclusion@Work framework. And so I think absolutely you do want to go to those resources for more details. But if you're needing help and you are looking for that one-on-one assistance, you can certainly reach out to these different resources. EARN has some excellent resources on their site, so you do want to go there. JAN is available as a free resource. We provide that one-on-one consultation. Our focus is on accommodations and technical assistance on the ADA. And then of course there's PEAT as well. So absolutely make sure that you're reaching out to these various resources for more information on the types of topics we've talked about today.

## [Q&A]

So at this time I think we may have a few minutes to look at some questions that we have here. So I'm going to go ahead and move there. Bear with me for a moment while I take a look here. And Ellice, we'll get you back on board here too.

**ELLICE SWITZER:**

Sure. And thank you, Tracie. I just wanted to thank you for pointing out that we've really hit the high points with the Inclusion@Work framework overview. It actually a pretty robust tool on the EARN website. There's a lot of information in there, and it is augmented by a lot of different tools and resources and mini courses. So I encourage you all to check it out and get more information than we had time for today.

The other thing -- you touched on a little bit, Tracie, but I want to make sure that I clarify. When I talk about a voluntary self-identification campaign, in no way am I suggesting that you ask a person if they have a disability; right? This is not part of a hiring process. We don't sit down with an interviewee and say, "Can you tell me whether or not you have a disability?" That's still not okay. We're talking about a process that uses an online form typically. It is a very, very, very specific data collection process, so I just wanted to make that clear.

**TRACIE DeFREITAS:**

I'm so glad you did that. Okay. Here's a question. I think it's really important. As more employers are inquiring about the idea of establishing a centralized process for evaluating, providing, and funding accommodations and you touched on this just briefly when you talked about your accommodation section. But I wonder if you could talk about some of the key considerations for designing a centralized accommodation program or fund. I do know that at JAN I think we're hearing this more often, where employers are interested in doing this. Could you maybe offer us some key considerations around that?

**ELLICE SWITZER:**

Sure. Absolutely. And I just want to point out that we actually have a checklist for employers on establishing a consolidated accommodation program, and it can be found on the EARN website along with a lot of other checklists that we offer around processes and procedures. So the main point of a centralized or consolidated accommodation program, often known as a CAP, is basically to do all of those things you just talked about; right? That we are streamlining this process. We're dedicating resources to this process. We're dedicating expertise to this process. And so a lot of organizations do that by first by just sort of consolidating all of the resources, subject matter expertise, etc, under one sort of departmental or unit umbrella. And then ensuring that there is a consistent funding stream for all accommodation processes.

And the reason why is because when sometimes -- and first of all, JAN has done some great research around this topic, but accommodations are mostly free or low-cost, and most that do cost something cost less than 500 dollars. But there's still this sort of misperception if a manager believes, for example, that accommodation costs have to come out of their own budget, they may be less likely to provide what's needed. So it streamlines the process, it keeps it moving, and it makes sure there's funding for it. I think again, like anything else, you've got to make sure you have top leadership commitment for it, obviously. We're talking about creating a new program, a new department. And then decide whether or not you have that expertise in-house. And if not, how can you get it; right? Can you upskill existing employees? Is it something you might want to contract out for? And then establish a team lead for sort of assessing that as you begin to engage in conversations about whether or not you're going to have a centralized accommodation program, and then decide whether or not it is going to be -- is it going to be establishment-specific or enterprise-wide? So if I work at Target, is there a centralized accommodation process in every single Target, or is there only one for the entire enterprise? So there's pros and cons to both, and organizations really need to figure out what works best for them.

**TRACIE DeFREITAS:**

That's incredibly helpful. I think employers are looking to do this, but they just don't really know where to start, and so I think that establishes some really good information they can use. And absolutely, the EARN checklist, I have seen it, and it's fantastic. I think employers should definitely look to that as a starting point. So go to AskEARN.org for more on that for sure.

## [Conclusion]

Ok. Well, it does look like actually we only have about two minutes left. For that reason, I am going to kind of close things out for us today. That's really kind of all the time we have. I will say thank you for joining the JAN webcast on "Building a Disability-Inclusive Organization." Ellice, you shared the core components of a disability-inclusive workplace and offered some great practical strategies to help employers become disability-inclusive, so we appreciate that. And thank you for partnering with us today to provide this important information.

We do encourage everyone to register for the next and final JAN Accommodation and Compliance Series webcast for 2022. It's "Providing Reasonable Accommodations to Veterans with Disabilities." This will be hosted on Thursday, November 10th at 2:00 Eastern. You can register today. Go to the training page at AskJAN.org.

We do hope that you'll share your feedback with us today about the webcast by completing the evaluation. Please keep the JAN webcast window open when the webcast ends. That evaluation will pop up in a new window. If you're seeking a CEU for this event, the CEU approval code will be available after that evaluation is completed. Just click on "View your certificate of completion."

Thank you to Alternative Communication Services for providing sign language interpreting and captioning services for this webcast today. We appreciate you.

Finally, if you have any questions about today's topic or need guidance on ADA and accommodation issues, please do contact JAN. Go to AskJAN.org for more information.

Once again, thank you for attending this JAN Accommodation and Compliance Series webcast. This concludes today's training.