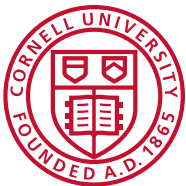




What Works? How Federal Contractors Are Implementing Section 503

Survey Report

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Research project overview

Purpose

In September 2013, The Office of Federal Contract Compliance Programs (OFCCP) published the final rule making changes to the regulations implementing Section 503 of the Rehabilitation Act of 1973, as amended (Section 503). In March 2014, the regulations went into effect, setting new requirements for federal contractors and subcontractors, related to non-discrimination and affirmative action in the employment of qualified individuals with disabilities. For example, contractors now are required to offer applicants and employees the opportunity to self-identify as a person with a disability and further to use the data collected to understand their progress toward a 7% utilization goal for employment of individuals with disabilities.¹

This survey is part of a larger project entitled, *Initial Impact of Section 503 Rules: Identifying Effective Employer Practices and Trends in Disability Violations among Federal Contractors* funded by the US Department of Labor, Chief Evaluation Office. The overall goal of this project is to understand the initial impact of these regulations on employer practices and consequently on the employment environment for individuals with disabilities. The purpose of the survey summarized in this report is to build an understanding of contractor disability-inclusive policy and practice in initially responding to Section 503 regulations. The survey is titled: *What Works? How Federal Contractors Are Implementing Section 503*, and is referred to as *Section 503 Survey* in this report.

Specifically, the survey was designed to increase understanding of:

- Workforce utilization of individuals with disabilities in early stages of compliance with the revised Section 503 regulations. This includes understanding the outcomes of inviting individuals to self-identify, specifically voluntary self-identification rates and response rates to invitations to self-identify;
- Promising emerging contractor practices and behaviors regarding disability recruiting, hiring, and employment; and
- Challenges contractors have encountered in implementing the regulations to date.

There is limited information available on how organizations are implementing the recent regulations and the facilitators and challenges encountered. In order to understand the preliminary impact of Section 503, it is essential to hear directly from employers about how their processes, including the review of data and practices, have changed in response to the regulations.

1 See www.dol.gov/ofccp/regs/compliance/section503.htm for further information.

Survey structure and target respondent

The survey was administered online and was designed to take about 15 minutes. The questions were organized into four sections:

- A. Characteristics of the organization and respondent role in the organization
- B. Internal goals/targets related to employing individuals with disabilities
- C. Use of the mandated [Voluntary Self-Identification Form](#) to collect disability status information
- D. Practices that are working and challenges to implementing Section 503

The target group of participants for the survey were representatives of organizations that are federal contractors, specifically human resources, compliance, or legal professionals who know about their organization's efforts to implement the recent regulations for Section 503 of the Rehabilitation Act. A full copy of the survey is available at DigitalCommons @ ILR: <http://digitalcommons.ilr.cornell.edu/edicollect/1360/>. An executive summary is available at DigitalCommons @ILR: <https://digitalcommons.ilr.cornell.edu/edicollect/1362/>.

Project partners

We collaborated with two organizations composed of federal contractors: the National Industry Liaison Group and DirectEmployers. These organizations provided input into the survey instrument and supported dissemination of the survey to their membership.

The National Industry Liaison Group (NILG) is an organization that supports 61 state and local Industry Liaison Groups, which are composed of small, mid-size and large contractors across the country (see <http://www.nationalilg.org>).

DirectEmployers is member-owned and managed consortium of talent acquisition and Office of Federal Contract Compliance Programs (OFCCP) compliance professionals representing approximately 850 contractors (see <https://directemployers.org/>).

Access to employers for conducting surveys can be challenging. We have found that working with employer organizations can assist in maximizing response rates, particularly if the topic has been identified as being of interest to the membership of the sponsoring/collaborating employer organizations (Erickson, von Schrader, & VanLooy, 2016).

Survey development, distribution and data analysis

Survey development process

The survey development process was iterative, and included extensive feedback from a broad range of stakeholders throughout the process. We had preliminary conversations with OFCCP about the topics of greatest interest to them in informing their programming. Both the business and the disability advocacy communities provided input, including project partner leadership and representatives from the federal contractor community. The survey instrument was further informed by research findings from prior related efforts, including recent employer survey findings (Domzal, Houtenville, & Sharma, 2008; Erickson, von Schrader, Bruyere, & VanLooy, 2013; Erickson, von Schrader, Bruyère, VanLooy, & Matteson, 2014). The survey was a mix of closed-ended questions (e.g., about practices in place and estimated self-identification rate) and open-ended questions, to allow employers to elaborate on what is working (or not). The survey contained key demographic questions to allow breakdowns by employer size and industry as well as comparison with past employer surveys. The initial survey draft was tested through a series of one-hour cognitive interviews with eight contractors to ensure relevance and clarity. After revisions based on these initial interviews, a final review was conducted by key individuals and groups.

A final paper draft of the survey was developed based on all data gathered. The online survey was programmed using the survey tool Qualtrics. We tested the online survey with several individuals, including some with visual impairments, to fine-tune item format and maximize accessibility for screen readers and smartphone/tablet users. An Institutional Review Board (IRB) exemption through Cornell's IRB was obtained. The data collected was anonymous, although contractors did have an opportunity to provide their name and email address for access to participation incentives (described below).

To achieve a shorter survey, branching was used in the design to limit the number of questions any respondent was asked. The survey was designed to collect data on the organizational unit most relevant to the respondent. A screener question was used to verify that the respondent was a federal contractor. Following the screener, respondents were asked if their organization was a single establishment or a multi-establishment organization. If they were a multi-establishment organization they were further asked if they maintained establishment-based affirmative action programs (AAPs)², functional AAPs (FAAPs) or both. Respondents selected whether they would like to complete the survey on behalf of their organization overall, or

² Functional affirmative action programs are based on a business function or business unit rather than on contractor establishments. An example of functional/business unit might be sales division that is based across multiple establishments. The FAAP would focus on equal employment opportunity in the sales division across establishments, while an establishment AAP would focus on a single establishment. See: <https://www.dol.gov/ofccp/regs/compliance/faap/index.htm>

their establishment or functional/business unit. Depending on the unit indicated that they were responding for, text was piped into questions that followed. For example, the word "organization" in the question "Does your [organization] have targets related to the following?" could be replaced with "establishment" or "functional/business unit" depending on response.

Further description is presented below on the organization and respondent characteristics.

Survey distribution

The survey was promoted at the NILG Annual Meeting in San Antonio in August 2017 through flyers and an announcement about the survey during the lunchtime keynote. We developed a survey landing page (<http://www.yti.cornell.edu/survey>); see Appendix A for a screen shot of the page and promotional materials to distribute at this event and for further distribution. These materials and web links were shared with our partners and other employer networks, including:

- NILG (via email to conference attendees and local/regional ILG chairs)
- DirectEmployers (via newsletter, social media, and email)
- Employer Assistance and Resource Network, EARN (via social media and newsletter)
- Job Accommodation Network, JAN (via social media)
- Washington DC Business Leadership Network, DCBLN (via newsletter and social media)
- Massachusetts Office on Disability, MOD Summit on Employment Opportunity (via flyers and social media)
- Yang-Tan Institute on Employment and Disability, Cornell University (via emails, blog and social media)
- American Association for Access, Equity, and Diversity, AAAED (via email)

Using organization-specific URLs, we were able to track the source of the survey returns from these different organizations' distribution efforts. The survey launched September 7, 2017 with a planned closing date of September 29, 2017, however, the survey was extended through October 31, 2017 to allow for additional responses.

To maximize responses to the survey, multiple reminders were sent and incentives were offered. Respondents were offered the following incentives for participation:

- Final report on study findings
- Access to BenchmarkABILITY™, Cornell's online benchmarking tool on workplace

disability inclusion (see <http://benchmarkability.org/>)

- Free online courses eligible for six HRCI credits. A set of six one-hour courses on workplace disability inclusion, designed by Cornell University, were made available at no cost for use by survey respondents from October 3 to December 31, 2017.

Survey data analysis

The survey data analysis in this report is descriptive with data from closed-ended items presented as means and percentages. Several items were open-ended, and these were analyzed using a conventional content analysis approach, coding responses and then developing themes. The presentation of the qualitative response highlights themes and includes representative quotes related to the theme. The sections on b) self-identification, c) recruitment, d) communication and training, and e) accommodation and networking each present a summary of effective practices (or “what works”) based on responses to open-ended items for each area on the survey. There was a single item on the survey that focused on the main challenges in implementing Section 503.

Future analyses will examine differences by key characteristics such as organization size, industry and sector, where sample sizes allow for comparison.

Sample

The survey distribution approach used a convenience sample rather than a random sample from the federal contractor population. This limits our ability to generalize to contractors nationally. However, we believe that even if our sample is not fully representative of the population of contractors, our analyses still support not only OFCCP and federal contractors in implementation of Section 503; but are also relevant to federal, state, local, and private (non-contractor) employers who are interested in good disability inclusion practices.

Sample selection

A total of 357 people accessed the survey and completed the screening item: “Does your organization have federal contracts or subcontracts of \$10,000 or more?” A total of 274

responded “yes” and were allowed to participate in the survey. The sample used for this report was limited to 235 individuals who completed the demographics section and the first set of content items. There was some attrition beyond the first set of items, but the majority completed all items on the survey.

Sample characteristics

Most organizations were multiple establishment organizations³ (82%), with the remainder being single establishment organizations (18%). Most of the multiple establishment organizations used only establishment-based AAPs (70%). Overall, 87% of multi-establishment respondents reported for their overall organization, rather than their establishment or functional/business unit. This is likely a reflection of the large number of multi-establishment respondents (90%) who were based at the headquarters of their organization. A full breakdown of the same by type of establishment, type of AAPs, and whether they reported for their unit or establishment is available from Figure B1 in Appendix B. While some respondents responded for their establishment or functional/business unit, in the remainder of the report we refer generally to the “organization” in order to simplify the language.

The characteristics of organizations can illustrate respondent diversity; fewer than 10% of contractors were reporting for an organization/unit with fewer than 50 employees. The typical (or median) organization/unit size was in the 2,000 to 4,999 range; close to a quarter of respondents were in firms with 20,000 or more employees (23.5%). The most common industry groups included Professional, Scientific, and Technical Services (23% of the sample), followed by Manufacturing (14%), Health Care and Social Assistance (13%), Educational Services (11%), Other Services (except Public Administration) (10%), and Finance and Insurance (8%). Separate questions identified those in the high-tech sector (31%) and defense sector (14%) Further information about organizational characteristics are available in Table 1 and Appendix B, Table B.1.

Multiple establishment organizations were asked about the number of AAPs their organization maintained; most maintained several. Fifty-eight percent of the multi-establishment sample had between 2 and 49 AAPs, and 26% had 50 or more AAPs (see Table 2 below).

The respondents had job functions most commonly in the areas of EEO/Affirmative Action (19%), Human Resources (HR, 15%), Compliance (13%), Diversity (9%), and Talent Acquisition/Recruitment (6%). Forty-two percent of respondents had been with their organizations for more than 10 years. For further information see Table 3 below.

³ Multiple establishment organizations are those doing business at more than one establishment, while single establishment organizations are those doing business at one establishment.

Table 1. Characteristics of respondents' organizations

Charateristics of respondents' organizations	Frequency	Percent
Number of employees in organization/unit		
0-14	9	3.9%
15-49	14	6.0%
50-99	11	4.7%
100-499	36	15.4%
500-1,999	33	14.1%
2,000-4,999	26	11.1%
5,000-19,000	50	21.4%
20,000 -99,999	47	20.1%
100,000+	8	3.4%
Industry		
Utilities	8	3.4%
Construction	9	3.9%
Manufacturing	33	14.2%
Wholesale Trade	2	0.9%
Retail Trade	5	2.2%
Transportation & Warehousing	10	4.3%
Information	4	1.7%
Finanace and Insurance	20	8.6%
Real Estate, Rental, & Leasing	1	0.4%
Professional, Scientific, and Technical Services	54	23.2%
Management of Companies & Enterprises	3	1.3%
Administrative & Support and Waste Management & Remediation Services	2	0.9%
Educational Services	25	10.7%
Healthcare and Social Assistance	30	12.9%
Other Services (Exept Public Administration)	24	10.3%
Public Administation	3	1.3%

Charateristics of respondents' organizations	Frequency	Percent
Select Cross-Industry Sectors		
High-tech sector (i.e. in an industry having high concentration of workers in STEM (Science, Technology, Engineering and Mathematics) occupations)	74	31.5%
Defense Sector	33	14.0%

Table 2. For multiple-establishment organizations, number of AAPs maintained by organization

Number of AAPs maintained	Frequency	Percent
1 plan	27	16.4%
2-4 plans	26	15.8%
5-24 plans	39	23.6%
25-49 plans	30	18.2%
50-99 plans	20	12.1%
100-199 plans	11	6.7%
200 or more plans	12	7.3%
Total	167	100%

Note: 25 respondents reported that they did not know.

Table 3. Characteristics of respondents

Charateristics of respondents	Frequency	Percent
Job function (could specify more than one)		
EEO/Affirmative Action	138	58.7%
Human Resources (HR)	113	48.1%
Compliance	92	39.1%
Diversity	66	28.1%
Talent Acquisition/Recruitment	46	19.6%
Disability	42	17.9%
Administrative	41	17.4%

Charateristics of respondents	Frequency	Percent
Employee Relations	39	16.6%
Training and Development	31	13.2%
Compensation	24	10.2%
Benefits	23	9.8%
Legal	19	8.1%
Organizational Development	19	8.1%
Labor/Industrial Relations	15	6.4%
Other (please specify)	15	6.4%
Health/Safety/Security	14	6.0%
Years with organization/unit		
Less than 1 year	8	3.5%
1 year	6	2.6%
2 years	22	9.5%
3 years	12	5.2%
4 years	26	11.2%
5 years	13	5.6%
6 years	11	4.7%
7 years	6	2.6%
8 years	10	4.3%
9 years	12	5.2%
10 years	8	3.5%
More than 10 years	98	42.2%

Results

The sections of the report are a) setting goals, b) self-identification, c) recruitment, d) communication and training, and e) accommodation and networking. Most sections begin with a summary of current contractor practices, followed by a summary of respondent responses on effective practice, and end with a summary of challenges noted by respondents.

In response to an open-ended item, a total of 99 respondents mentioned one or more challenges that fell into the broad categories (in order of frequency) of self-identification, recruitment and outreach, communicating about the initiative and disability, information systems, new administrative burden, lack of resources, and supporting workers with disabilities. We present these challenges in more detail, including quotes from respondents in the following sections of the report.

Setting goals

One of the most recognizable aspects of Section 503 is the utilization goal, which requires contractors to aim for a workforce in which 7% are individuals with disabilities (across job categories for larger contractors). Organizations can meet this utilization goal in a number of ways: they can increase recruitment and hiring of people with disabilities, and/or they can increase the level of self-identification among both applicants and employees. Making efforts to retain and advance employees with disabilities already in the workplace can help to keep them engaged, further supporting the utilization goal.

Setting goals: What contractors are doing?

Typically, an important first step in making changes in an organization is setting targets or goals. We asked respondents to describe whether they currently had identified informal or specific targets in the areas of self-identification, recruitment, hiring, retention and advancement. Relatively few (6-12%) had “specific target(s) with plans in place (e.g., assigned tasks, roles, responsibilities)” related to any of the areas designed to increase disability representation numbers. A few more indicated that they had “specific target(s) (e.g., numbers, timelines)” (7-18% depending on the specific area). Around half (44-59%) indicated that they had “informal target(s) (not well defined)” see Figure 1 below. In general, respondents were more likely to have targets around self-identification, recruitment, and hiring; and less likely to have targets related to retention and advancement of people with disabilities.

More than 80% of Section 503 Survey respondents had targets in place focused on increasing recruitment and hiring; but only about 60% had targets related to retaining and advancing employees with disabilities.

Figure 1. Goals/targets related to disability in organizations (Table 4 below presents data in an accessible format)

Question Text: Does your organization/unit have targets related to the following? N=235

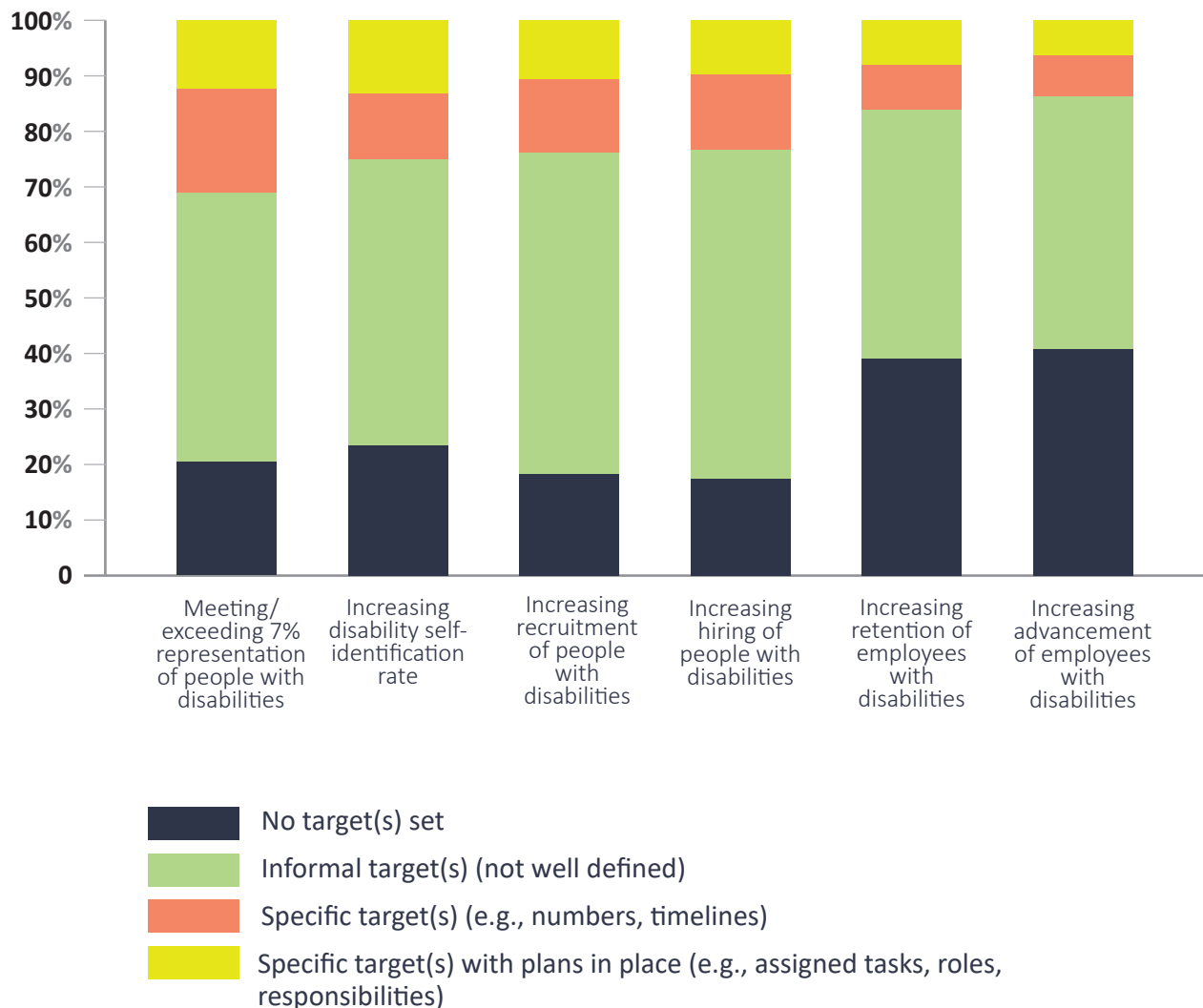


Table 4. Goals/targets related to disability in organizations

Goals/targets	No target(s) set	Informal target(s) (not well defined)	Specific target(s) (e.g. numbers, timelines)	Specific target(s) with plans in place (e.g. assigned tasks, roles, responsibilities)
Meeting/exceeding 7% representation of people with disabilities	20.4%	48.5%	18.7%	12.3%
Increasing disability self-identification rate	23.4%	51.5%	11.9%	13.2%
Increasing recruitment of people with disabilities	18.3%	57.9%	13.2%	10.6%
Increasing hiring of people with disabilities	17.5%	59.2%	13.6%	9.8%
Increasing retention of employees with disabilities	39.2%	44.7%	8.1%	8.1%
Increasing advancement of employees with disabilities	40.9%	45.5%	7.2%	6.4%

The impact of recent Section 503 regulations

Most respondents indicated that the recent regulations have impacted their affirmative action goals and/or targets, with 42% indicating they were impacted somewhat and 15% to a great extent. Over 88% indicated that they had been impacted at least a little (Figure 2). Among those respondents who indicated that they had targets, between 56-82% (depending on the target area) indicated that their targets were influenced by the recent 503 regulations (Figure 3).

Over 88% of Section 503 Survey respondents changed their affirmative action goals/targets related to employing people with disabilities as a result of Section 503.

Figure 2. Extent to which affirmative action goals/targets related to employing people with disabilities changed as a result of recent Section 503 regulations (Table 5 below presents data in an accessible format)

Question Text: Extent to which affirmative action goals/targets related to employing people with disabilities changed as a result of recent Section 503 regulations? N=228

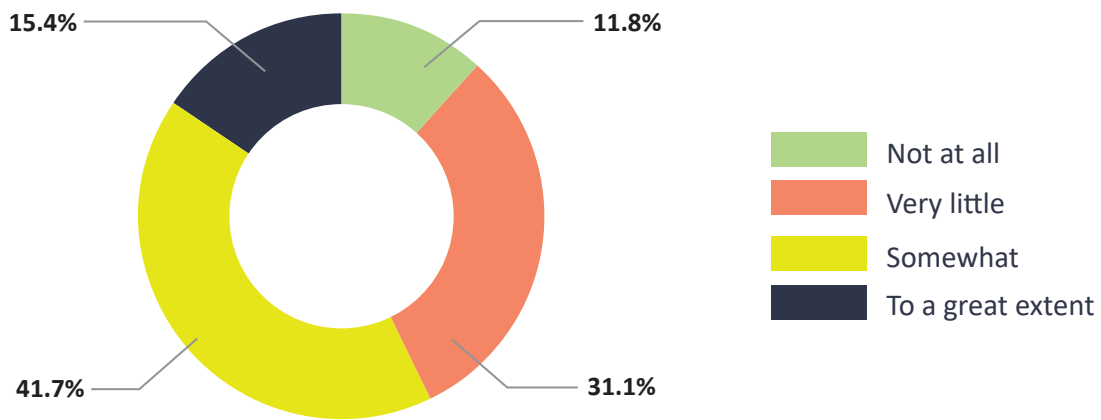


Table 5. Extent to which affirmative action goals/targets related to employing people with disabilities changed as a result of recent Section 503 regulations

Change	Frequency	Percent
Not at all	27	11.8%
Very little	71	31.1%
Somewhat	95	41.7%
To a great extent	35	15.4%

Figure 3. Recent Section 503 regulations influence on targets (Table 6 below presents data in an accessible format)

Question Text: Did the recent Section 503 regulations that became effective in March 2014 influence your target(s) related to the following?

Note: Question was only asked of respondents who had a target in place.

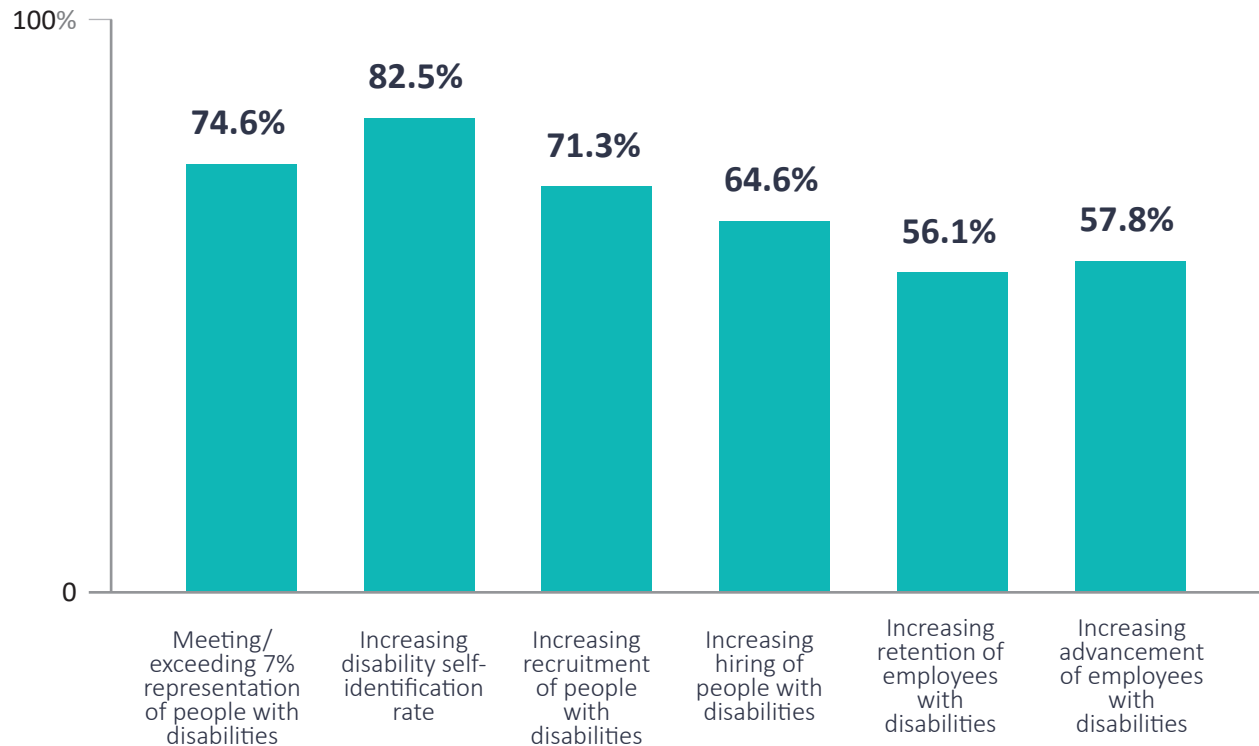


Table 6. Recent Section 503 regulations influence on targets

Targets	Number with target in place	Among those with target, % reporting recent Section 503 regulations influenced target
Meeting/exceeding 7% representation of people with disabilities	185	74.6%
Increasing disability self-identification rate	177	82.5%
Increasing recruitment of people with disabilities	188	71.3%
Increasing hiring of people with disabilities	189	64.6%
Increasing retention of employees with disabilities	139	56.1%
Increasing advancement of employees with disabilities	135	57.8%

Self-identification

The Section 503 regulations that became effective in March 2014 require that employers who are federal contractors provide applicants the opportunity to self-identify both pre-offer and post-offer, and provide the same opportunity to employees at least once every 5 years. To assist this process, the OFCCP designed the [Voluntary Self-Identification of Disability Form](#), (referred to henceforth as the self-ID form), which contractors must use for data collection. The goal is that 7% of employees be people with disabilities, across job categories. Data collection is designed to support understanding of current disability representation as well as evaluating the effectiveness of outreach and recruitment efforts in support of this goal. However, to get accurate statistics on the workforce, individuals with disabilities must be willing to voluntarily reveal that they have a disability on the self-ID form. While the stakes are relatively high for employers to collect accurate data, there is very little if any motivation for employees to self-identify. The disclosure decision is complex, and there is a growing body of research in this area (e.g., Saal, Martinez, & Smith, 2014; Santuzzi, Waltz, Finkelstein, & Rupp, 2014; Jans, Kay, & Jones, 2014; von Schrader, Malzer, & Bruyère, 2014). Factors that may encourage disclosure include a supportive supervisor relationship, knowing that an employer has made efforts to create a disability inclusive environment, and knowing that others have disclosed disability in the organization and were successful (von Schrader, et al., 2014).

Self-identification: What contractors are doing?

Disability self-identification data collection

As required, most respondents report that their organization has used the self-ID form to collect data on disability status (90.4%), and most of those collecting data have integrated the form into their HR or other appropriate system (95.9%). Among respondents who report that their organization is using the form to collect data, the majority had reviewed their self-ID data within the last 6 months (60%).

Among organizations using the self-ID form, response rate for employees varied widely (see Table 7 below). About 37% said that more than 80% of their employees have completed the self-ID form. The typical organization (median value) fell into the category of 51-60%. However, a third of respondents indicated 30% or fewer of their company's employees had completed the self-ID form. Clearly, getting people to respond the self-ID form is a significant issue.

The survey asked respondents what percentage of employees who had completed the form had identified as an individual with a disability (Table 8). Relatively few (approximately 15%) reported meeting or exceeding the 7% utilization goal.

Nearly 50% of the Section 503 Survey respondents indicated that their organization/unit's disability self-identification rate was 2% or less.

Table 7. Percentage of employees who have completed the self-ID form at your organization/unit

Question Text: Of the employees at your organization/unit, approximately what percentage have completed the self-identification form?

Note: Includes only organizations/units using the self-identification form to collect data on disability status.

Percentage of employees	Frequency	Percent
0%	1	0.7%
1-10%	23	15.3%
11-20%	18	12.0%
21-30%	9	6.0%
31-40%	8	5.3%
41-50%	10	6.7%
51-60%	12	8.0%
61-70%	5	3.3%
71-80%	9	6.0%
More than 80%	55	36.7%
Total	150	100%

Missing = 12, Data not available = 11, Don't know = 35

Table 8. Of employees who have completed the self-ID form, percentage that indicated that they have a disability

Question Text: Of employees who have completed the self-identification form, approximately what percentage indicated that they have a disability?

Note: Includes only organizations/units using the self-identification form to collect data on disability status.

Percentage of employees	Frequency	Percent
0%	2	1.3%
1%	38	25.5%
2%	32	21.5%
3%	19	12.8%
4%	20	13.4%
5%	10	6.7%
6%	5	3.4%
7%	6	4.0%
More than 7%	17	11.4%
Total	149	100%

Missing =49; Data not available =10

How are organizations using the disability self-identification data?

Nearly nine out of ten reported their organization is either currently using (60%) or plans to use in the next 12 months (30%) the disability self-identification data to assess progress toward the 7% utilization goal. Similar proportions are either using (50%) or planning to use (37%) this data to gauge success in outreach and recruitment. Similarly, over eight in ten are using (51%) or planning to use (35%) it to assess progress in hiring. Two thirds reported either using (27%) or planning to use it (39%) to assess progress in retention. About six in ten were either using (23%) or planning to use (38%) it to review progress in advancement.

Self-identification: What works?

Table 9 presents various approaches that employers are using to encourage self-identification. The list of options used for this item was compiled in consultation with our employer partners during survey development. The most common practice was making self-ID form available

when employees update personal information, with 57% offering this option. Next most common was annual communication to encourage self-identification (52%) and communication from organizational leaders (41%). Although less frequently done, a formal self-identification campaign (29%), spotlighting successful employees with disabilities (19%) and making self-identification part of the annual open enrollment process (16%) were rated slightly more effective than the more common practices. The highest scores for effectiveness were for formal self-identification campaign and spotlighting successful employees, with effectiveness scores of 3.5 and 3.4 respectively, scores that fall in the range of 3 = moderately effective to 4 = very effective.

Table 9. Practice used to encourage applicants and current employees to self-identify on the self-ID form. (Respondents could select one or more.)

Question Text: How does your organization/unit encourage applicants and current employees to self-identify on the self-identification form? (Select all that apply).

Practice	Percent with practice	Mean (SD) effectiveness rating
Making self-identification form available when employees update personal information	57.0%	3.0 (1.1)
Annual communication to employees encouraging self-identification	51.5%	2.7 (0.9)
Communication from organizational leaders to employees about the purpose of self-ID	40.5%	3.0 (1.1)
Formal self-identification campaign	28.0%	3.5 (1.1)
Spotlighting successful employees with disabilities	18.5%	3.4 (1.2)
Making self-identification form part of annual open enrollment process	16.0%	3.2 (1.2)

Note: 200 respondents completed this item. Only respondents who had practice were asked about its effectiveness. Effectiveness ratings: 1= not effective at all, 2 = slightly effective; 3 = moderately effective; 4 = very effective; and 5 = extremely effective

In addition to the practices listed in Table 9, respondents were provided an open-ended opportunity to specify other practices that had been effective in their organizations to encourage self-identification. About 25% of completed surveys included a narrative response to this item; responses were summarized into themes and are presented below. The practices fell into two broad categories: 1) including the form in existing process and systems and 2) improving communication around self-identification.

Including the form in existing process and systems

Respondents described encouraging increased response to the self-ID form during the application process by building the form into the online application process — for example, requiring a self-ID form to be completed or intentionally bypassed when applying. When online applications are not used, the form can be presented with the employment application. Likewise, onboarding was a key point in the employment process to share information about the form, for example, by including the form in as part of new employee paperwork, explaining the form on the first day, and offering an opportunity to complete the form at new employee orientation. Including the form in the Applicant Tracking System (ATS) or Human Resource Information System (HRIS) was noted as helpful in increasing response rates, the opportunity to self-identify can be highlighted and explained on the HRIS and the form can be a specific option available directly from the self-service HRIS. Several noted that only surveying every five years may not be enough and that more frequent surveying of employees may increase response rates, some suggested sending out an email blast every two years with a link to the self-ID form or even doing it annually, perhaps in combination with other data collection, for example on veteran status.

Improving communication around self-identification through various approaches

Several respondents described approaches to promoting self-identification through better communication and education, this is a topic that we delve more deeply into later in this report. The types of practices mentioned included campaigns, events, or trainings. One respondent noted that they do a disability outreach campaign with a special landing page on their careers site that includes employee profiles and blogs with stories of employees with disabilities. In response to the challenge of communicating what is meant by the term “disability” on the self-ID form, one respondent said that during National Disability Employment Awareness Month, their organization puts out articles educating about disability including one on describing what is considered a disability. Other practices mentioned included educating about disability and self-identification; examples included training for employees and managers or organizing an organization-wide event focused on disability. One respondent indicated that they promote their support for the disability community both within the organization as well as in the community more broadly to promote their organization as disability inclusive.

To more directly encourage self-identification, respondents affirmed that sharing information about self-identification at key moments can be helpful. For example, when an individual discloses a disability as part of accommodation request or when someone requests an accessible parking permit can be opportunities to educate about the self-identification process. Several organizations noted that their Disability Employee Resource Group (ERG) was helpful in getting word out about self-identification, both in crafting appropriate messaging and also educating and advocating for employees to self-identify.

Self-identification: Challenges

Self-identification was the most frequently mentioned challenge in implementing the Section 503 regulations for respondent organizations. Organizations clearly report struggling with getting employees to self-identify as a person with a disability. The reasons ranged from logistical issues to the difficulty of building the trust that makes applicants and employees comfortable sharing their disability status.

The self-ID form and logistical challenges

Several respondents were frustrated with the self-ID form: “It is difficult that we can't use our own form, but have to utilize the OMB-approved form, which in our opinion, lacks additional information around disability, (and) why it is good to self-identify. We also feel that the examples of what is a disability are very restricted on that form,” or “The form was poorly constructed and not easy to use and provided little information with respect to what was or was not a disability. No opportunity to edit the form to make it simpler or provide information.” Others noted that just sending out the form without an adequate explanation of why the mandated form was seriously limiting response.

In fact, for some employers it was less about willingness to self-identify than just getting employees and applicants to complete the form. Many reported struggling with the best way to get more people to access and complete the form. This was an issue with several employers, but may be more of a challenge among organizations where employees do not regularly access a computer. For example, it was noted, “It is built into our application and onboarding process[es] but we can't make it mandatory that people fill it out. We have a very high number of hourly workers on assembly lines and it is difficult to get them to go online to fill out the form, and paper forms are not filled out when they are presented.”

Several of the challenges related to self-identification were less about getting people to disclose a disability and more about the workload and system alterations that were required to make this data collection and reporting logistically possible. Several cited an increase in administrative workload, with challenges of “coordinating centrally for so many different locations,” and handling the additional documentation required, including the utilization goal of 7% by job groups, documenting recruitment efforts, and evaluating physical capabilities of jobs. In cases where organizations were collecting paper forms for self-identification, they describe an “increased workload with inputting, scanning, (and) filing of hard forms.” Another described challenges of “Keeping track of the responses to the self-ID forms. Filing and storage of these forms is very difficult as they are anonymous, and we have a great deal of rehired employees, so the paperwork becomes redundant.”

Setting up information systems to handle the new data collection and reporting requirements was a challenge. This included both updating HRIS and/or ATS systems to use the required form, but also “updating websites, self-service portals, recruiting/onboarding applications, etc.” Beyond updating the HRIS, the self-ID form needs to be integrated into current processes

and workflow, for example, into the “applicant and new hire workflow.” Collecting data using the form was a challenge as was updating the information systems to output the needed documentation for AAPs. One respondent noted the challenge of integrating these changes in a multi-national organization: “Global systems and processes (are) not flexible to meet US law needs.”

Building trust

Respondents also observed “We know there is a large population of our employees that have a disability, but have not self-identified as so.” Building trust is difficult, and as one respondent noted, communication is not enough: “The challenge of overcoming perceptions, despite appropriate communication, that disability status will be shared or known by others such as a manager.” or as another respondent notes: “no matter how much you tell them it doesn't matter it's hard to break that belief that they will be judged.” One shared that “employees find [requests for self-identification] intrusive and do not like sharing that information except as anecdotally.”

Some respondents described a lack of understanding about what qualifies as a disability and hesitation to identify as a person with a disability because of associated stigma. “The biggest challenge is overcoming the definition of a disability. Most people see this as a significant impairment to your abilities, however a disability can go unnoticed.” Another stated that “People are reluctant to label themselves as disabled. Even many people who consider themselves "disabled" this year, may say they aren't disabled the next time asked, even though the wording is "have you ever been" considered disabled. They consider only ‘profoundly disabled’ or ‘wheel-chair bound’ individuals disabled.”

Results also showed that perceptions about disability can differ between industries. In construction and perhaps other industries, disability is not something people will admit or they fear they will not be able to work: “In our industry [construction], employees do not want to be perceived as not being able to do the work. To the uneducated, a disability means that you may not be able to do the work. We hire laborers who have never, ever even seen a doctor a day in their lives.”

Recruitment

The most valuable asset for any company and a significant part of its strategic advantage is having the right talent in place for the particular job at hand. Yet many companies report that they have difficulty filling positions because of talent shortage. The Section 503 utilization goal is designed to increase employment opportunity for individuals with disabilities, and from the contractor perspective, this goal also presents an opportunity to increase the pool of available talent to meet their talent needs. Therefore, a critical first step in implementing Section 503 is to establish a talent pipeline of qualified candidates who are individuals with disabilities. Employers commonly cite the lack of qualified applicants as a barrier to hiring people with disabilities (Domzal, et al. 2008; Erickson, et al., 2013; Kessler/NOD, 2010). Evidence suggests that only a minority (11-45%), of employers actively recruit workers with disabilities, with smaller employers being less likely to recruit (Dixon, Kruse, & Van Horn, 2003; Domzal et al., 2008; Lengnick-Hall, Gaunt, & Collison, 2003; Erickson et al., 2014). In light of these findings, there has been a push in the field to use internships and community partnerships as a tool to enhance the hiring of people with disabilities (Domzal et al., 2008; Nicholas, Kauder, Krepcio, & Baker, 2011). In a study examining the relative influence of different practices on the hiring of people with disabilities in an organization, employers with an internship program for people with disabilities were almost six times more likely to have hired a person with a disability than those who did not (Erickson et al., 2014). Other practices such as establishing relationships with community organizations and reviewing accessibility of application systems were also strongly related to hiring.

Recruitment: What contractors are doing?

Respondents were asked whether they had each of six recruitment practices in place. The results are presented in Figure 4 below. More than 75% of respondents indicated that their organization/unit had each of the following practices in place: partner with community organizations, post on disability job boards, and ensure accessibility of online application forms. Fewer used federal/state/local government training and/or placement programs (51%) or partnered with disability services offices at colleges and universities (44%). Fewer than a third of organizations participate in internships or similar programs that target people with disabilities.

Figure 4. Recruitment practices: Does your organization/unit currently have the following practices in place? (Table 10 below presents data in an accessible format)

Question Text: Does your organization/unit currently have the following practices in place?
N=219

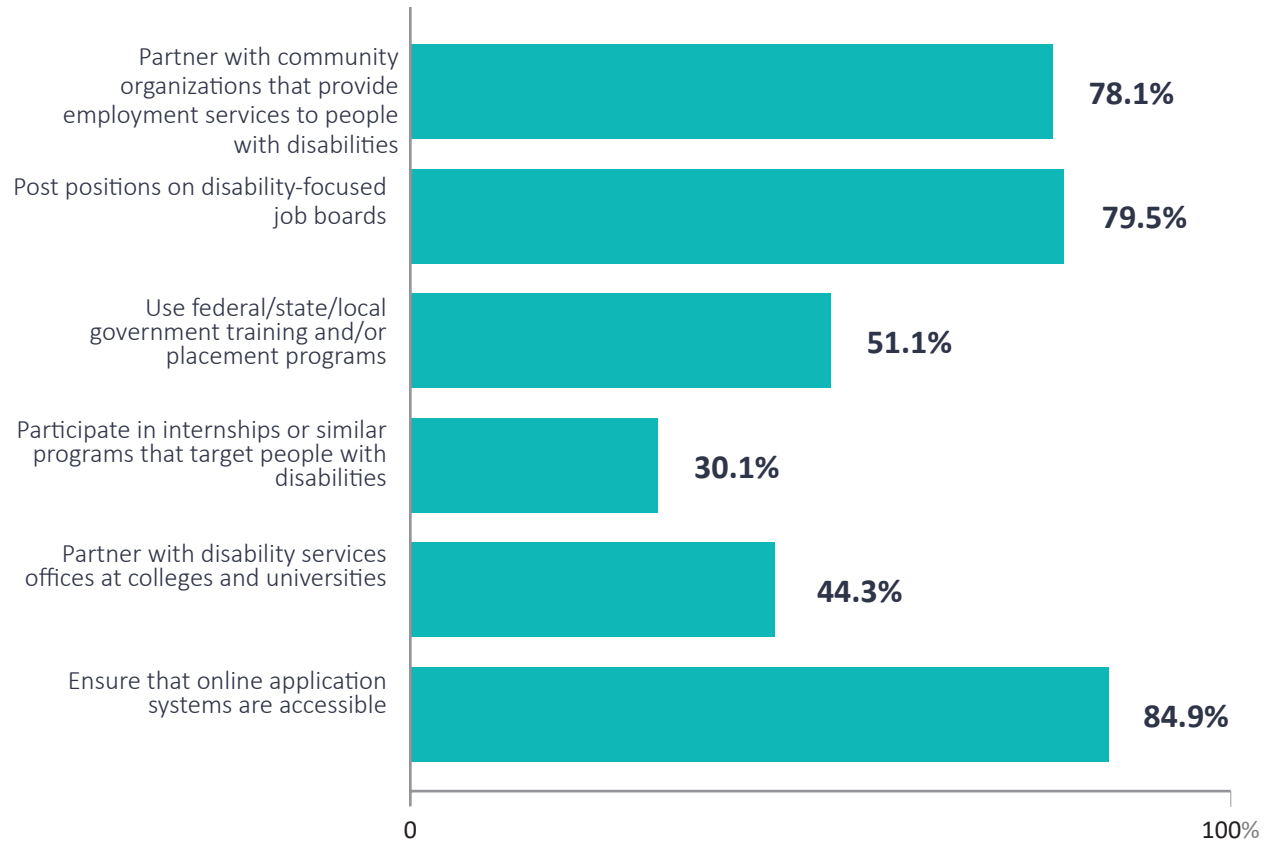


Table 10. Recruitment practices: Does your organization/unit currently have the following practices in place?

Practice	Number (percent) of organizations/units with practice currently in place
Partner with community organizations that provide employment services to people with disabilities	171 (78.1%)
Post positions on disability-focused job boards	174 (79.5%)
Use federal/state/local government training and/or placement programs	112 (51.1%)
Participate in internships or similar programs that target people with disabilities	66 (30.1%)
Partner with disability services offices at colleges and universities	97 (44.3%)
Ensure that online application systems are accessible	186 (84.9%)

The impact of Section 503 regulations

If an organization reported that a particular practice was in place, a follow-up question asked if that practice had changed as a result of the Section 503 regulations. Of the organizations who had a practice listed in Figure 5 currently in place, between 19% and 37% (depending on the practice) had initiated the practice as a result of the Section 503 regulations; and 31% to 47% of organizations expanded the practice. Partnering with community organizations (47% expanded this practice) and posting on job boards (46%) were the practices most commonly expanded. The most commonly initiated practice was partnering with disability services offices at colleges and universities (37% initiated the practice).

Figure 5. Recruitment practices: How did the Section 503 regulations impact the following practices? (Table 11 below presents data in an accessible format)

Question Text: How did the Section 503 regulations that became effective in March of 2014 impact the following practices in your organization/unit? Note: Question only asked of respondents who currently had practice in place.

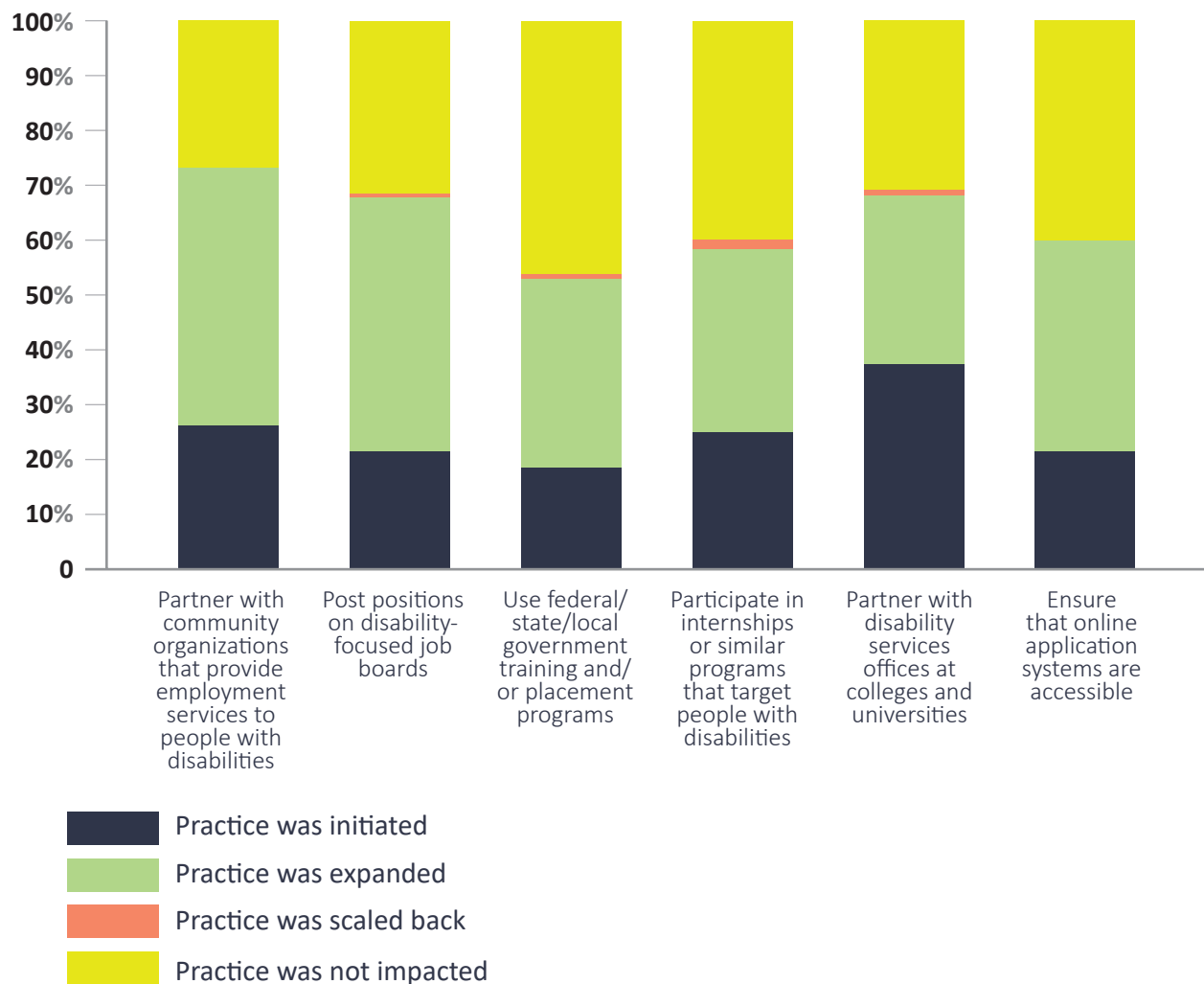


Table 11. Recruitment practices: How did the Section 503 regulations impact the following practices?

Practice	Practice was initiated	Practice was expanded	Practice was scaled back	Practice was not impacted
Partner with community organizations that provide employment services to people with disabilities	26.2%	47.0%	0.0%	26.8%
Post positions on disability-focused job boards	21.4%	46.4%	0.6%	31.6%
Use federal/state/local government training and/or placement programs	18.5%	34.3%	0.9%	46.3%
Participate in internships or similar programs that target people with disabilities	25.0%	33.3%	1.7%	40.0%
Partner with disability services offices at colleges and universities	37.4%	30.8%	1.1%	30.8%
Ensure that online application systems are accessible	21.5%	38.4%	0.0%	40.1%

Recruitment: What works?

In order to better gauge what employers are doing and what is working, we asked this open-ended question: “What recruiting efforts (not limited to the above) have you found particularly effective or ineffective in recruiting individuals with disabilities? Please provide any detail that may help others in considering such an effort.” A total of 69 respondents provided feedback, summarized below.

Demonstrating disability-inclusive culture

Many employers described efforts to demonstrate their commitment to accessibility and outreach to people with disabilities with practices such as: creating an accessible job application system, using accessible job posting sites, attending online career fairs and virtual interviews to make recruitment efforts and interviewing more accessible to people with disabilities. A respondent noted that it was effective to have “a person with a disability recruit/onboard new hires to get new hires with disabilities to feel more at ease to disclose.” Another felt that assigning responsibility within the HR department for recruiting, hiring and retention of individuals with disabilities and veterans was helpful. One respondent mentioned that referrals were their most successful approach to finding qualified applicants, and that “an environment

friendly and safe for those with a disability seem to be the best source for us.” Different types of organizations may try to build and demonstrate an inclusive culture in different ways; an institution of higher education noted they were “building a disability studies minor program which is working to attract more faculty in the field and serve as catalyst for research and ultimately workplace climate change.”

Educating recruiters and managers

Supporting recruiters through training and awareness-building, engaging hiring managers/supervisors, and tracking and reviewing disability related outreach efforts were cited as effective practices. Several respondents mentioned educating recruiters through formal awareness training, for example, one respondent indicated that their “D&I Team conducted interview and recruiting etiquette [training] with our Talent Acquisition Teams. This is now a part of their ‘new recruiter’ training. It also provided them with information to assist their hiring managers when considering applicants/employees with disabilities.” Engaging the hiring manager/supervisor was also mentioned as a useful practice in recruitment and hiring, “Speaking with supervisors prior to the interview process and then bringing the supervisor in on the actual interview (not just the skill set testing) has been effective.” Another respondent noted that sharing information about disability recruitment efforts was added as a regular topic at recruiter staff meetings. In terms of tracking outreach and recruitment efforts, using dedicated source codes helped with data management and allowed recruiters to review what was working and make adjustments.

Engaging with disability community and professionals to educate about organization and its jobs

Several respondents mentioned that holding events or providing other opportunities for individuals with disabilities or disability service professionals to visit the company was a useful way to engage the disability community and recruit. For example, one respondent’s organization hosts “an annual job fair for individuals with disabilities, specifically [those who are] visually impaired.” Another offers an onsite mentoring day for civilians and veterans with disabilities, providing the opportunity to learn more about the organization and potential positions. Other companies have had success with bringing disability organization professionals to the worksite. “We have invited agencies to our workplace so they can see the type of work we do. That way they can better assess to see if their clients have the right skills for the work, with or without accommodation.”

The need to educate the disability community and service providers was important for several employers: “Making sure that the disability community understands the full range of opportunities in our organization versus what they may assume based on our industry.” “[When] working with public and private or non-profit organizations to find talent, [i]t’s very important for them to understand the roles and observe the workplace so they can understand the demands of the job and find individuals that are able to perform the job.” Another respondent

reported that they work with “organizations that support the individual on the job through job coaching [and this] has been very effective. Having a job coach come in and tour the company prior to offering candidates an opportunity to apply has also created a successful partnership.”

Several practices enriched relationships with local disability organizations. Educating providers and assisting potential applicants, for example, “Recruiters have weekly office hours at local disability service providers to provide information on jobs at the institution, assist individuals in navigating the application system.” Another respondent stated that active engagement with disability organizations strengthens these ties: “Active and strong partnership/participation with specific organizations focused on supporting individuals with disabilities (IWDs). This support should be beyond the HR team but having business leaders and associates as active volunteers and board members for these organizations.” Another respondent noted: “We've joined the advisory board at a local rehabilitation hospital to partner with other companies to develop education and best practices for hiring and developing people with disabilities.”

Job boards, partnerships, and resources

Many organizations reported using job boards to identify qualified candidates, but the feedback on the efficacy of using job boards was mixed. Posting jobs on disability focused job boards or with disability related organizations like state VR agencies, advocacy organizations, disability resource offices at colleges and universities, and centers for independent living (CILs) was useful for some organizations, but many indicated deeper partnerships were necessary, “You have to engage with external agencies that will support you with employing persons with disabilities -- posting opportunities on websites targeted for [individuals with disabilities] is not enough.”

Respondents named a wide variety of local, state, and national resources they used for recruiting. Many respondents are working with several partners: “We work closely with the VA, Department of Rehabilitation, Community Agencies that provide support for people with disabilities - to include non-profits, Tech Schools, Colleges and other local community based services.” Others collaborated with “Vocational Rehabilitation Offices and Workforce Development Offices” or “local Workforce Boards to educate potential employees on employment opportunities.” In seeking veterans as applicants, an organization worked with “Veteran programs such as Vocational Rehab programs, partnering with the veterans assistants at the One Stop sites, and even posting on military bases.” Many organizations work with local disability placement providers and/or disability advocacy organizations locally. Other resources listed were Tangram Business Resourcing, The National Technical Institute for the Deaf, Career Opportunities for Students with Disabilities (COSD), Workforce Recruitment Program (WRP), US Business Leadership Network (USBLN), Careers and the Disabled, and Wounded Warriors.

Recruitment: Challenges

While self-identification was the most common area mentioned as challenging for employers desiring improved employment outcomes for people with disabilities, the broad category of

outreach and recruitment was a close second identified by respondents. Employers raised several common issues, specifically structural and behavioral barriers in disability recruitment, partnering with local or community based-disability organizations, ineffective and expensive job posting boards, finding the correct skill sets for available jobs, concern about whether people with disabilities can do jobs, and outreach and recruiting source tracking.

Encouraging commitment to disability hiring

In order to make change, it is important to garner and communicate commitment to make disability recruitment and hiring a priority. While this is challenging in a small organization, it can be even more difficult in a large, dispersed organization. Survey respondents reported: “We have trouble engaging people and getting commitment across the firm. We have 100 locations across the U.S. and some of our offices are smaller and have few resources to dedicate to making inroads in their localities. It is also hard to get those at the corporate level to take the time necessary to research, identify, and build relationships with organizations serving IWDs.” Some respondents noted a challenge inherent in the structure of their recruiting staff. For example, one respondent said that there was no central recruiting team to communicate company-wide initiatives. Others observed that training recruiters around disability outreach was a challenge. Part of the issue identified in reaching out to recruiters was the “difficulty in changing mindset of recruiters and hiring managers to consider alternative avenues to find candidates.”

Finding candidates who are a good match to jobs

Several organizations struggled to find recruitment sources for more skilled or experienced hires. One respondent said, “I believe there are a limited number of qualified engineers in the pool of disability focused organizations. Qualified candidates [with disability] become available to us through more conventional recruitment sources.” Another noted that, “Because the majority of our opportunities are for experienced hires, we have not had the opportunity to work with college campuses or state-funded programs to support recruitment.” Similarly, several employers mentioned that it is challenging to find individuals for highly technical, more specialized roles or senior management roles. For example, “Colleges and federal and state agencies come out (to) meet with us and promise to support us, but their clients typically/often do not have required technical skillsets for our positions.”

One respondent noted that the effective disability recruitment may take more time, describing the challenge of “Finding qualified applicants within a reasonable timespan to fill the position.”

Concern that people with disabilities are not a fit for certain types of jobs

Some employers expressed concern that their positions would not be a fit for individuals with disabilities. For example, “Many of our positions are in manufacturing plants and consequently, it is difficult (to) place some individuals” or “Hiring people with disabilities [is] challenging due

to the physical nature of our work.” Another noted: “We do have outreach with many of the colleges... for our salary position hires. Our plant locations outreach is more challenging due to our production jobs being more challenging to staff.”

Building and maintaining effective partnerships

Developing local partnerships can also be challenging. It takes time to build relationships, and in some cases these partners may lack continuity and responsiveness. One respondent described the specific difficulty experienced: “finding and keeping good disability partner relationships that will provide us with qualified candidates. There always seems to be a really high turnover rate with several of the organizations we have used.” Another noted “Too much turnover in organizations that support and assist IWDs. Always seem to be reintroducing organization and getting new people up to speed.” “Unfortunately many of the disability vocational reps through the state have been unresponsive even after phone calls, emails, and visits. It's unfortunate because that's the best opportunity to get directly connected to applicants. Those that are communicative have been helpful; unfortunately it's only been a small percentage.”

In some cases, the local agencies may focus on their own priorities and not meet the needs of the employer in finding candidates. For example, “We have invited local workforce agency to our campus and met with them. But they're only interested in having our organization hire IWDs from their lists. However, our practice is that all applicants need to apply to a position, we do not hire directly without a position.” Another noted frustration with, “Local referring agenc[ies] that "push" individuals through the system to up their numbers.” Several organizations discussed the difficulty that being a larger company, with geographically diverse locations, brings in forming partnerships, which tend to be at a local level. One respondent stated, “We are a national employer and most not-for-profits in this space are local.”

Several respondents noted that there was just a lack of availability and relevance of disability groups to partner within the local area. Others said that they felt that partnerships were just not leading to the results they desired, “The results of our recruiting efforts have been marginal. While we have reached out to the state rehab organizations and developed specific programs for outreach and identified jobs/departments to focus on, we haven't had the success we had hoped. We paid for a partnership with a disability outreach organization and haven't seen much success either.”

As an alternative to developing partnerships with community service provider organizations, several employers mentioned using job boards, although there was concern about the effectiveness and cost. As one respondent wrote: “posting opportunities on websites targeted for IWDs is not enough” to get qualified candidates for specific jobs. Another indicated that cost was a barrier to using disability specific job boards: “Posting to job boards that are geared towards individuals with disabilities is expensive. I have yet to find a government funded, free, site to post jobs other than the state job sites which do not effectively focus in individuals with disabilities.”

Tracking outreach and recruitment efforts

A few employers described challenges in tracking outreach activity and candidate source tracking -- “Outreach partners [are] not equipped to handle large organizations.” “The hardest for us has been to track every single outreach initiative, every day, all year long, and prepare the annual written assessment of the effectiveness of outreach. It is very hard to assess something when you have limited information or data. We also have to send out letters to all our suppliers every year asking them to take 'appropriate action.' What a waste of time. Most people don't know what to do with the letter, and then they start calling us.” One respondent noted the challenge of developing an applicant tracking system to accurately track the source of hires.

It was challenging to some to implement the new outreach and recruitment requirements with limited or no additional resources: “Not enough people, time or budget.”

Communication and training

A strategy for communication about the recent regulations and more broadly about disability inclusion in the workplace has the potential to improve implementation of the regulations. Previous research can inform both content and the critical targets of communication and training initiatives. Lack of knowledge of, communication about, and accountability for disability inclusion and related practices across all stages of leadership (top level to frontline supervisors) are important barriers to creating an inclusive climate (Nishii & Bruyère, 2014; Nishii & Bruyère, 2016). For example, top management commitment to disability inclusion is essential to implementation of effective practices (Domzal et al., 2008; Moore, Konrad, & Hunt, 2010) and can have an important impact on how managers and others implement practice (Bruyère, 2000; Bruyère, Erickson, & Horne, 2002; Nishii & Bruyère, 2014). Leaders can set the tone in an organization and their buy-in can influence how the rest of the organization feels about and implements an initiative. Therefore communicating this commitment, and demonstrating that it goes beyond compliance is important to effective implementation (Nishii & Bruyère, 2016; Nishii, 2010, 2014).

Building awareness of disability across the entire workforce can increase comfort levels and reduce stereotypes and bias, however there are some key players in the workforce who are critical to effective implementation. Managers are often the key arbiters of who gets hired, promoted, coached, included, developed, or terminated. Despite this gatekeeping role, direct managers are difficult to reach and are often not included in disability inclusiveness training efforts (Rudstam, Hittleman, Pi & Strobel Gower, 2013; Rudstam & Strobel Gower, 2012). Since individuals with disabilities are much more likely to disclose a disability to their manager than to HR or via a formal self-identification system (Nishii & Bruyère, 2014), this lack of awareness may limit disability inclusion in the workplace and employees' willingness to self-identify. Further, recruiters are a key in developing a pipeline of talent, so building awareness and understanding of disability inclusion is important as organizations seek to meet the 7% utilization goal.

Communication and training: What contractors are doing?

Respondents answered questions about communication and training practices that they currently have in place. While more than 95% have disability in the organizational EEO statement, fewer were implementing internal communication campaigns related to disability (53%), or training managers (60%) or recruiters (62%) on disability issues providing disability awareness training for employees (51%) (Figure 6).

Figure 6. Communication and training practices: Does your organization/unit currently have the following communication and training practices in place? (Table 12 below presents data in an accessible format)

Question Text: Does your organization/unit currently have the following communication and training practices in place? N=216

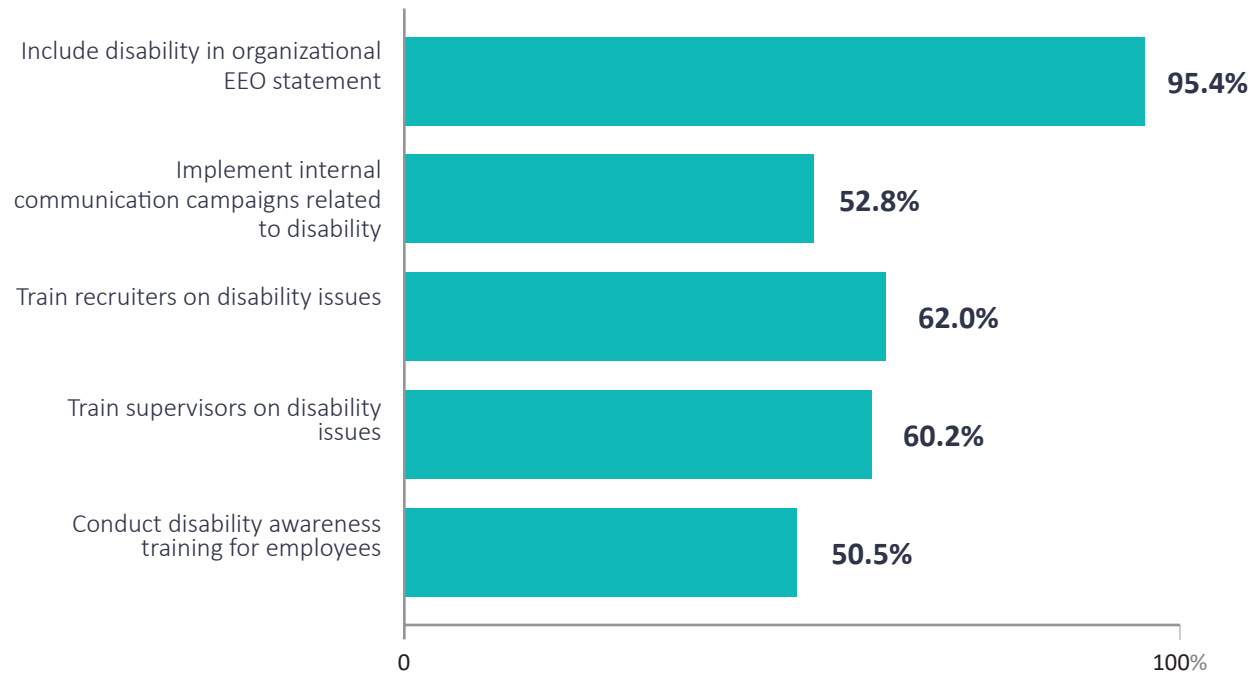


Table 12. Communication and training practices: Does your organization/unit currently have the following communication and training practices in place?

Practice	Number (percent) of organizations/units with practice currently in place
Include disability in organizational EEO statement	206 (95.4%)
Implement internal communication campaigns related to disability	114 (52.8%)
Train recruiters on disability issues	134 (62.0%)
Train supervisors on disability issues	130 (60.2%)
Conduct disability awareness training for employees	109 (50.5%)

The impact of recent Section 503 regulations

Among organizations who had the practices listed in Figure 7 currently in place, between 23% and 32% initiated the practice as a result of the recent regulations; and 25% to 35% of organizations expanded the practice. Training recruiters on disability issues (35%) was the practice most commonly expanded and implementing internal communication campaigns related to disability was the most commonly initiated practice (32% initiated the practice), see Figure 7.

Figure 7. Communication and training practices: How did the Section 503 regulations impact the following practices? (Table 13 below presents data in an accessible format)

Question Text: How did the Section 503 regulations that became effective in March of 2014 impact the following practices in your organization/unit? Note: Question only asked of respondents who currently had practice in place.

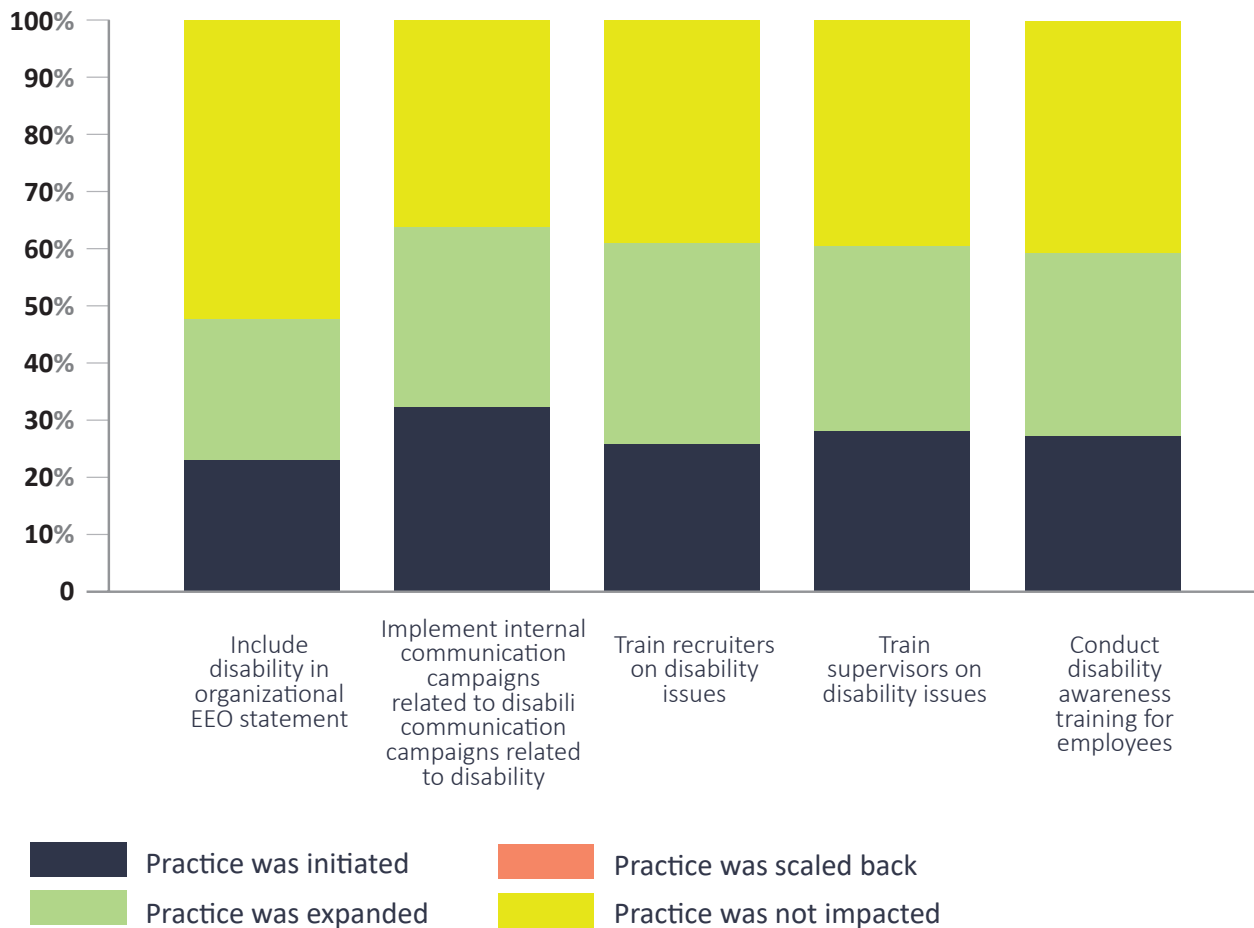


Table 13. Communication and training practices: How did the Section 503 regulations impact the following practices?

Practice	Practice was initiated	Practice was expanded	Practice was scaled back	Practice was not impacted
Include disability in organizational EEO statement	23.1%	24.6%	0.0%	52.3%
Implement internal communication campaigns related to disability	32.4%	31.5%	0.0%	36.1%
Train recruiters on disability issues	25.8%	35.2%	0.0%	39.1%
Train supervisors on disability issues	28.2%	32.3%	0.0%	39.5%
Conduct disability awareness training for employees	27.2%	32.0%	0.0%	40.8%

Communication and training: What works?

Fifty-one respondents suggested practices that were working in their organizations in response to the question: What communication and training efforts related to disability (not limited to the above) have you found particularly effective or ineffective? Please provide any detail that may help others considering such an effort.

Respondents suggested many approaches to get the word out about Section 503-related initiatives, these fell into the broad (not mutually exclusive) categories of campaigns, messaging, and training. Some organizations were just beginning to build a communication strategy: “Our company is in the process of expanding our communication and training efforts to reach all managers and employees to further educate them on disability awareness and encourage greater self-disclosure of those with disabilities by creating a more inclusive and comfortable environment.” Others had implemented strategies and were evaluating results, often by examining changes in the self-identification rate.

Communication campaigns and messaging

Respondents talked about communication campaigns around disability, with one observing: “Intermittent campaigns internally seem to have increased willingness to self-identify because the topic has been “normalized” by talking about it.” A critical piece was engaging individuals with disabilities in developing communication strategies.” A respondent said that it was helpful to engage “the disability business resource groups to help plan and/or participate in campaign.”

Respondents described campaigns that included a variety of elements to raise awareness, including: “the use of learning videos, narratives, awareness and etiquette training;” “Onsite

events and activities relating to disability inclusion;" "Communications from senior leaders regarding importance;" and "Showing what the company does for the disability community & sharing employee stories." Another reported "Posting a short video [of] an individual who may or may not have a noticeable disability, but is excited to share a little bit about their job responsibilities and a small success story." Several respondents echoed the value of leader involvement and sharing success stories "In all aspects of communication and recruiting I find the most effective efforts are those led by and supported by leadership with practical examples and success stories." One respondent pointed out that the most powerful messaging is seeing people with disabilities in the workplace: "seeing is believing." This can be achieved through messaging that includes sharing personal stories of individuals who are successful in the workplace.

The messages that organizations were working to convey centered on encouraging self-identification. Communicating to employees sharing information about disability is potentially helpful both for the individual with a disability and also the organization. The messaging can be complex, however, as illustrated by respondents who reported, "Trying to explain that just because someone may be able to "check the box" that they have, or have had, a disability doesn't mean they are "disabled" in the workforce. We have lots of employees with invisible disabilities and they may, or may not, require accommodations." Different modes of sharing disability messaging that were mentioned include internal online communities like Facebook or LinkedIn, internal blogs, webinars, and email.

Training related to disability

Training is a key part of educating about disability and relevant practices, but respondents differed as to who was trained, how training was administered, and what was covered. Disability awareness and etiquette and ADA Accommodation training were the most frequently mentioned training topics. Other training mentioned included web accessibility and document accessibility training for different audiences within their organization. As one respondent noted, "having material in alternative format-ready at the time of requests" demonstrates a commitment to disability inclusion. By educating all workers about accessibility, materials can be designed to be accessible from the beginning, saving time in the long run.

Organizations who recruit from certain disability groups, e.g., people who are deaf, may benefit from training that builds awareness for coworkers, for example, building awareness of Deaf culture. Training for all employees and targeted to supervisors and recruiters were all mentioned, with some disability related training integrated into existing training. This was often within orientation or manager training. Some respondents mentioned that they outsourced a training, while others had the capacity to develop the programming within the organization.

The approaches to training were varied and depended on different factors. Some indicated that in-person training was their approach while another respondent noted that "Webinar training is the easiest and most effective way to communicate with our managers and

employees.” Educating workers in different jobs may require different training approaches, “We are constantly trying to educate our workforce about the laws, regulations and rights that they have here in the U.S. We do all-employee briefings (mostly on safety), but when we gather employees together, we try to talk about things like equal opportunity, non-harassment, benefits, disability, and so forth. Our workforce doesn't sit in an auditorium and watch a PowerPoint presentation. They come to a yard or a trailer and then go to their job sites. We try to train in groups, before they go out, or at the end of the day when all the trucks and laborers return.” In smaller organizations, different approaches may be more effective, for example, one organization provides “one-on-one communication with supervisors/managers as it relates to individuals asking for accommodation.” One respondent noted that encouraging managers to keep “an open door for any issues that may arise and being open and flexible in supervising an employee with a disability has been effective.”

Communication and training: Challenges

Communicating importance of disability initiatives across the organization

One of the biggest challenges in communication and training reported was getting buy-in and engagement from the key players in the organization. As one respondent noted, “Getting everyone on board and the same page at the same time.” Having a decentralized organization makes this even tougher, “Our organization is decentralized and the challenge has been trying to get other schools to buy into one central practice” one respondent stated that “lack of a D&I team” made implementation of communication strategies more difficult.

Respondents described difficulty building engagement at several levels of their organization, specifically among leaders, recruiters, and managers. One respondent mentioned it was a challenge to get leaders to care “about this aspect of diversity in the workplace” and several respondents observed that “gender and race issues constantly seem to be at the forefront when addressing diversity and inclusion and disability is rarely addressed.” One respondent stated that it is challenging to influence, “corporate culture to see this as a business imperative initiative and expand the work we are doing under these regulations.”

Engaging managers and recruiters

Two other key stakeholders in the organization that respondents mentioned as communication challenges were recruiters and managers. They described issues with “getting our Talent Acquisition Group on board with developing effective partnerships to improve outreach efforts,” and “difficulty in changing mindset of recruiters and hiring managers to consider alternative avenues to find candidates.” Respondents said that they struggled in “training managers to understand that a disability goes beyond what may be visual and the critical role they have in the process.” and more generally, “communicating to managers the reason for the 7% utilization goal.”

Getting training initiatives off the ground

There were several concerns raised about putting a training program in place. One respondent noted that they “developed comprehensive education series on disability accommodations but were unable to obtain support to deliver training” and another said, “The most challenging to me were: 1. making the business case for the training, 2. making the training mandatory, 3. extremely low training participation rates.”

Current initiatives not working

Several were unsure about whether communication and training efforts were making a difference. For example, “We have not been able to determine if the training efforts have been successful, as we continue to witness employees choosing not to identify as disabled that are perceived to be such at the business unit.” “The communication during open enrollment netted a few self-identifications each year but not enough to move the needle.” “We recently emailed employees for the mid 5-year notice that they could update their status at any time through our HRIS self-service. Only about 3% of our employees updated their status and most of them didn't actually change their selection, they just resent the same selections.”

Accommodation and networking

Creating a supportive environment for employees (with and without disabilities) can increase employee retention, an important goal for employers. This section focuses on two approaches to supporting workers with disabilities, specifically through providing accommodation and through what we broadly refer to as networking.

Accommodation can provide important benefits such as retention of valued employees, increased employee productivity, increased attendance among workers with and without disabilities, enhanced workplace diversity, savings in workers' compensation or insurance cost, and improved overall company safety (Loy, 2016). However, one-quarter of HR professionals cited supervisor lack of knowledge of accommodations as a barrier to employing people with disabilities (Erickson et al., 2013). Developing a formalized process that is easy to access when needed can make the process easier for all involved, including the employee, manager and HR. Further, removing concerns about budgetary implications of providing accommodations at the unit level has the potential to remove concern about accommodations, and some organizations approach this by having a centralized fund for accommodation.

Mentoring and sponsorship programs can connect employees and build networks across an organization; these programs have the potential to support the advancement of under-represented minority groups, including people with disabilities. Another approach to creating a supportive environment is to provide employees additional opportunities to contribute to the organization by offering their input. Examples of such strategies include: soliciting feedback via surveys or focus groups, and including employees at various levels of the organization in analysis and related decision-making. In recent decades, employee resource groups (ERGs) have emerged as a promising approach to engaging employees, and have become a central employer diversity initiative. They provide a conduit of feedback to leadership, can improve recruitment of diverse populations, demonstrate the importance of workplace diversity, and lead to more inclusive HR and processes (Ball, Monaco, Schmeling, Schartz, & Blanck, 2005; Douglas, 2008; Githens, 2009; Githens & Aragon, 2009; Muñoz & Thomas, 2006).

Accommodation and networking: What contractors are doing?

The accommodation and networking practices designed to support and retain workers with disabilities were somewhat less common than the recruitment and communication practices presented earlier. One exception is having a formal process for accommodation, which 83% of organizations/units had implemented. Only about a third of organizations/units reported having the following practices in place: a designated budget for accommodations, mentoring program or a disability- focused ERGs (Figure 8).

Figure 8. Accommodation and networking practices: Does your organization/unit currently have the following practices in place? (Table 14 below presents data in an accessible format)

Question Text: Accommodation and networking practices: Does your organization/unit currently have the following accommodation and networking practices in place? N=210

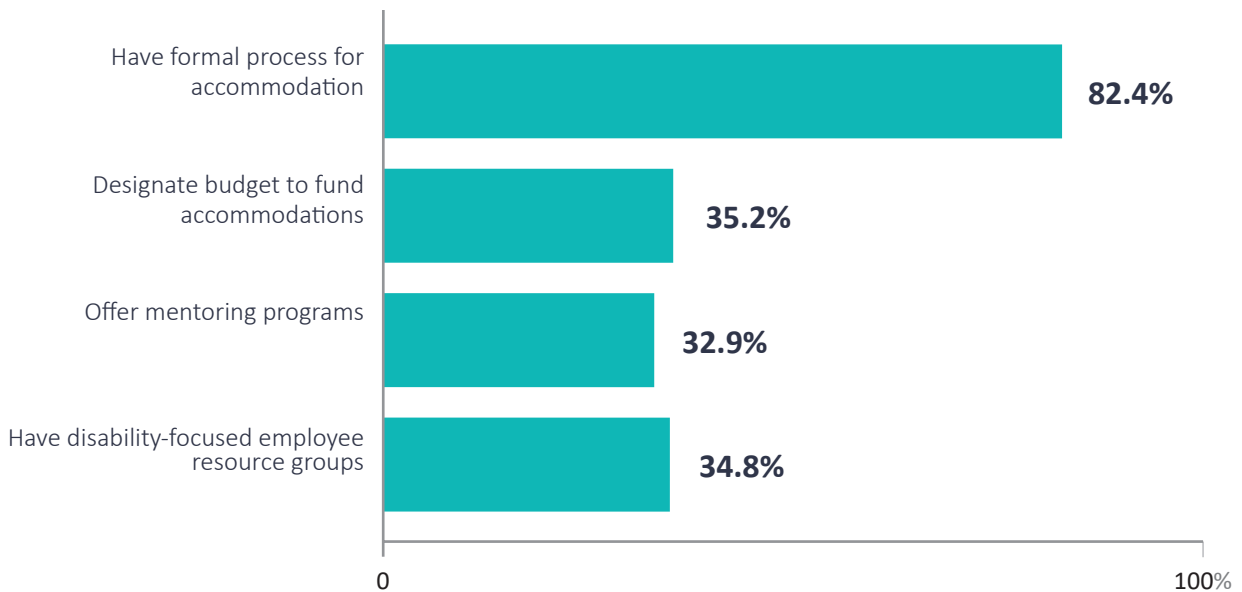


Table 14. Accommodation and networking practices: Does your organization/unit currently have the following practices in place?

Practice	Number (percent) of organizations/units with practice currently in place
Have formal process for accommodation	173 (82.4%)
Designate budget to fund accommodations	74 (35.2%)
Offer mentoring programs	69 (32.9%)
Have disability-focused employee resource groups	73 (34.8%)

The impact of recent Section 503 regulations

Among organizations who had the practices listed in Figure 9 currently in place, between 5% and 27% (depending on the practice) initiated the practice as a result of the recent regulations; and 22% to 35% of organizations expanded the practices. Having a formal process for accommodation (35%) was the practice most commonly expanded and having a disability-focused employee resource group was the most commonly initiated practice (27% initiated the practice).

Figure 9. Accommodation and networking practices: How did the Section 503 regulations impact the following practices? (Table 15 below presents data in an accessible format)

Question Text: How did the Section 503 regulations that became effective in March of 2014 impact the following practices in your organization/unit? Note: Question only asked of respondents who currently had practice in place.

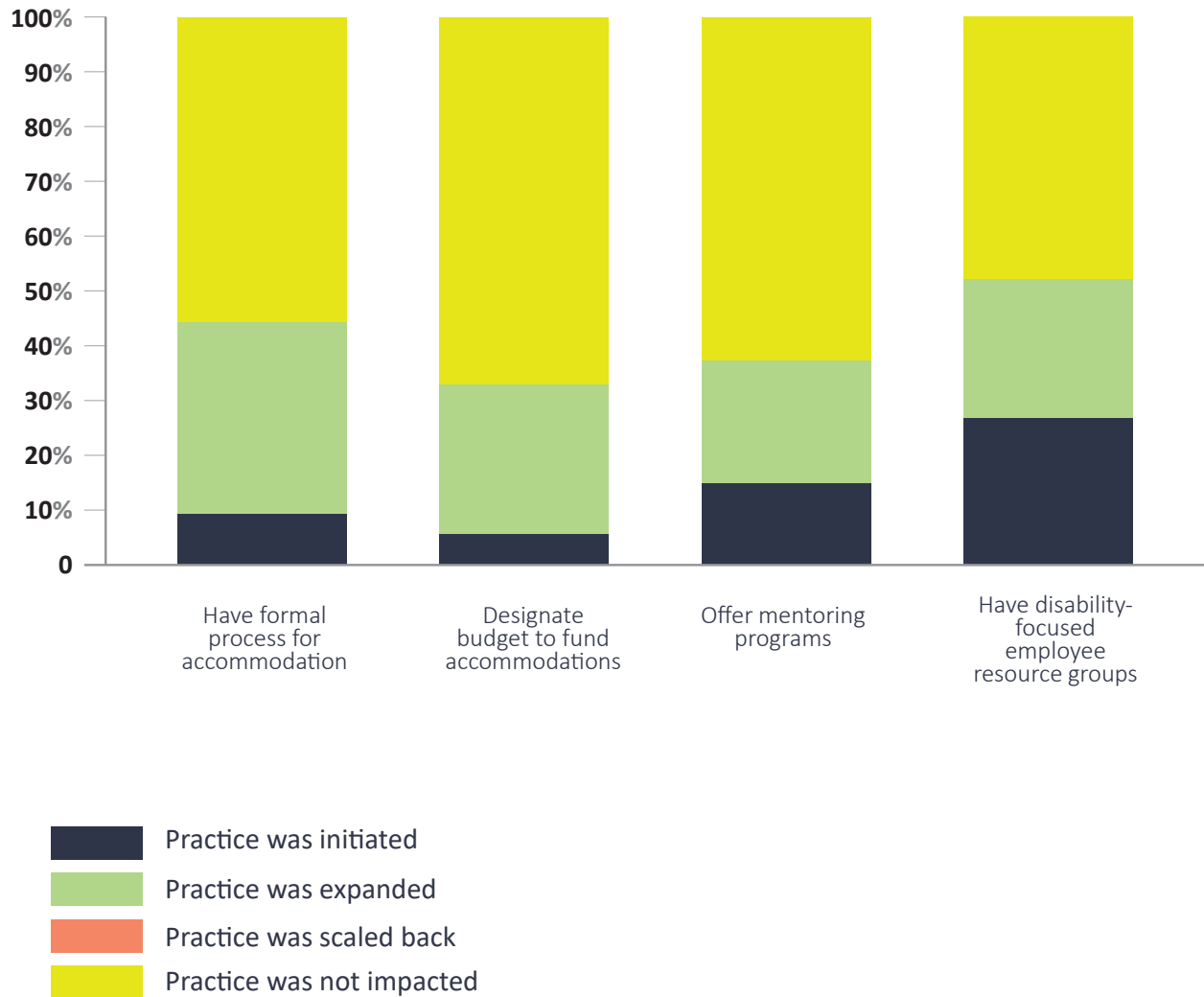


Table 15. Accommodation and networking practices: How did the Section 503 regulations impact the following practices?

Practice	Practice was initiated	Practice was expanded	Practice was scaled back	Practice was not impacted
Have formal process for accommodation	9.3%	34.9%	0.0%	55.8%
Designate budget to fund accommodations	5.5%	27.4%	0.0%	67.1%
Offer mentoring programs	14.9%	22.4%	0.0%	62.7%
Have disability-focused employee resource groups	26.8%	25.4%	0.0%	47.9%

Accommodation and networking: What works?

Thirty-seven respondents provided more detail on their practices related to supporting people with disabilities in response to this question: What practices or programs (not limited to the above) have been particularly effective or ineffective in supporting people with disabilities? Please provide any detail that may help others considering such an effort.

Creating an accommodating workplace

In one smaller organization, the workplace was described as “familial,” with an aging workforce they were able to accommodate and retain workers. Another smaller company stated, “Since the company is [small], Management is easily accessible with Open Door Policy. If a reasonable accommodation is required, it is quickly addressed. There are no layers and layers of Management, and Human Resources is the main contact for many employees.” Another organization said: “To date I know of no accommodations that have been requested by our employees that were not honored. We make every effort to have our employees comfortable in their workspace and able to perform their job duties.”

As organizations grow in size, the need for a formalized policies and processes, as well as dedicated staff responsible for the accommodation process, were noted. These policies and processes were reported as necessary to ensure “uniformity and consistency” in the accommodation process, and also the need to make these resources accessible to all employees. One respondent cited the importance of clearly defining the accommodation process, from how a request is initiated and processed, providing access to forms and estimates of the timeline for decision-making. Prominently sharing information about the process was also mentioned: “We have made material on our policies and on requesting accommodations more

prominent on our websites. We are making an effort to assure that this material and all other policy material be presented in a format accessible to individuals with low vision.”

Several respondents described how accommodations are funded in their organizations. “We have formal policies in place and an organizational commitment to provide reasonable accommodations. We include funds in program budgets to support employee accessibility/accommodations whenever an employee with a disability is hired. We also include funding in program budgets to support accessibility/accommodations for clients. These are separate line items.” The funding of accommodation was mentioned by several others, with most stating that they had a centralized fund for accommodation, while others did not have a dedicated budget reserved. Some reported that, “Although there is not a budget for this, funds become available for what's needed when it's needed.” Another said, “We don't have a specified budget for accommodations, it is up to the manager to provide and we haven't had any issues with that. We provide a lot of ergonomic accommodations to people that don't have disabilities, so the culture is one that we will get you what you need to do your job.” Another mentioned that, “We add funds to the budgets of groups that need accommodations resources.”

Designated staff for disability-related matters

The availability of designated staff to offer support around accommodation and disability related issues more generally was described by several respondents. One respondent noted they had “expanded resources within our HR team to be able to address employees and supervisors in handling questions and helping work through solutions.” Another respondent’s organization had a “Dedicated point of contact for all disability-related matters.” Another mentioned other roles that were part of their organization, “We have a dedicated Veteran's Liaison to support our Veterans with Disabilities. We also have a person in charge of Assistive Technology.” One respondent’s organization had established a “disability inclusion strategy task force.” Not every organization will have expertise around disability issues internal to the organization; one respondent cited the valuable resources in the community related to disability and in particular with partnering disability organizations to fill this gap.

Using data to understand needs and what works

Beyond accommodation, several respondents used data to understand needs and to better support employees with disabilities. Approaches to data collection were diverse but were designed to provide targeted information for planning. “We have employee focus groups that include people with disabilities to discuss on-going employee needs for diversity education.” Another said: “We administered a survey to determine what workplace climate issues may be related to disability identification. Moving forward we are working with administrators to include additional demographic facets in climate surveys conducted among faculty and staff.” Having regular discussions with the implementers of policy and practice in the organization can provide an important perspective: “Open discussions with HR and managers regarding needs, requirements, what's working/what isn't working.”

Utilizing disability employee resource group (ERG)

While some organizations mentioned the challenge of getting a disability ERG off the ground, those organizations who had active ERGs found their collaboration invaluable --“Our Disability ERG is celebrating their 10th year, (and) it has been the catalyst for change throughout the enterprise.”

Accommodation and networking: Challenges

There were relatively fewer challenges noted in this area, perhaps because the Section 503 regulations are more focused on outreach and hiring and less on retention.

Starting a disability-focused ERG

A couple of respondents raised concerns about retention, as one respondent described the challenge of “creating & implementing internal programs to support disability candidates once hired (such as ERGs).” The value of input and collaboration from active disability employee resource groups was noted by several respondents, but one challenge was getting disability-focused employee resource groups off the ground, even in organizations that had other employee resource groups. One respondent explained: “We attempted to initiate a disability-focused employee resource group and did not get sufficient response.” Some attributed that difficulty to the importance of such groups growing out of a grassroots effort and not a top-down initiative: “We have several employee resource/affinity groups, but have had a hard time getting a disability group started. There hasn't been a grass roots push from employees, so our senior leadership has not made it a priority. Our other groups started as employee driven groups.”

Summary: Overall impressions implementing Section 503

Implementing the Section 503 regulations required significant changes for many employers, and with those changes come challenges. Overall, many employers did not have major challenges implementing the regulations, with just over 60% indicating that they had experienced challenges as “to a great extent” or “somewhat.” While the rest indicated very little or no challenges in implementation (Figure 10).

About 39% of the Section 503 Survey respondents indicated that they had experienced very little or no challenges in implementing recent Section 503 regulations.

Figure 10. Respondent ratings of extent their organization/unit encountered challenges in implementing the recent Section 503 regulations (Table 16 below presents data in an accessible format)

Question Text: To what extent has your organization/unit encountered challenges in implementing the recent Section 503 regulations? N=201

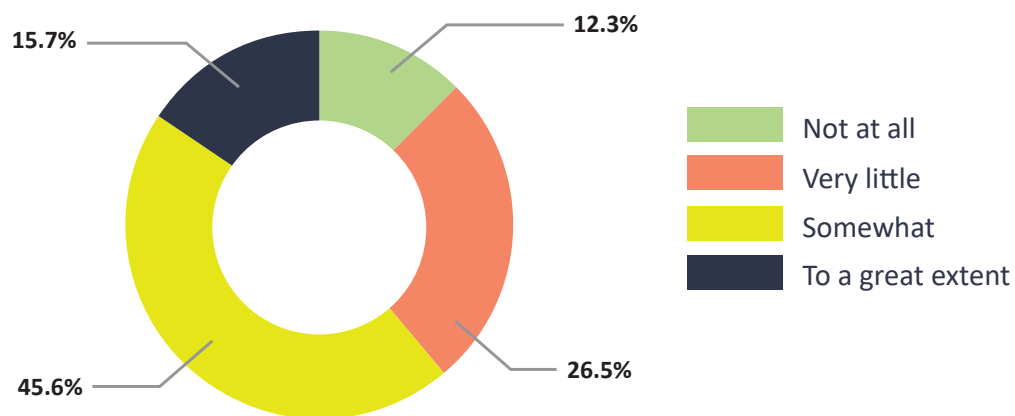


Table 16. Respondent ratings of extent their organization/unit encountered challenges in implementing the recent Section 503 regulations

Extent of challenges	Frequency	Percent
To a great extent	32	15.7%
Somewhat	93	45.6%
Very little	54	26.5%
Not at all	25	12.3%

The goal of increasing employment of individuals with disabilities for many employers has meant changes in policy and practice at organization. Overall, about half of respondents felt their organization’s policies or practices related to employing people with disabilities had changed “somewhat” or “to a great extent” and a result of the recent regulations (Figure 11).

Only 15% of Section 503 Survey respondents reported that their organization/unit's practices/policies had not changed at all as a result of Section 503.

Figure 11. Respondent ratings of extent their organization/unit's practices and policies related to employing people with disabilities changed as a result of the recent Section 503 regulations (Table 17 below presents data in an accessible format)

Question Text: Overall, to what extent has your organization/unit's practices/policies related to employing people with disabilities changed as a result of the recent Section 503 regulations? N=206

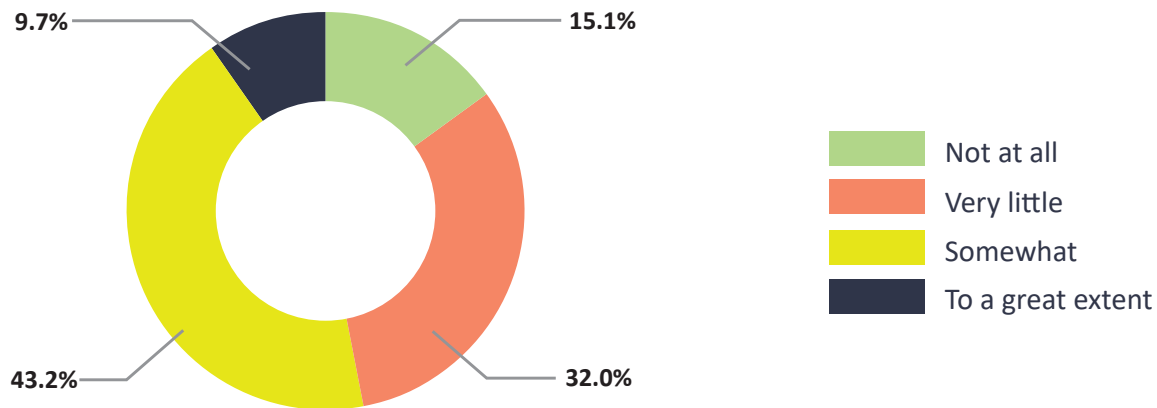


Table 17. Respondent ratings of extent their organization/unit's practices and policies related to employing people with disabilities changed as a result of the recent Section 503 regulations

Extent of change	Frequency	Percent
Not at all	31	15.1%
Very little	66	32.0%
Somewhat	89	43.2%
To a great extent	20	9.7%

Interestingly, despite the changes to practice and policy, contractors were not sure whether the changes that they were implementing would lead to an increase in employment of people with disabilities in their organization. Nearly 30% thought there would be an increase in disability representation in their organization, with the remainder unsure (47%) or disagreeing (23%) that there would be an increase (Figure 12).

Nearly 30% thought there would be an increase in disability representation in their organization as a result of recent Section 503 regulations.

Figure 12. Respondent level of agreement with the following statement, “The recent Section 503 regulations will lead to increased employment of people with disabilities in my organization/unit” (Table 18 below presents data in an accessible format)

Question Text: Please rate your level of agreement with the following statement: "The recent Section 503 regulations will lead to increased employment of people with disabilities in my organization/unit." N=205

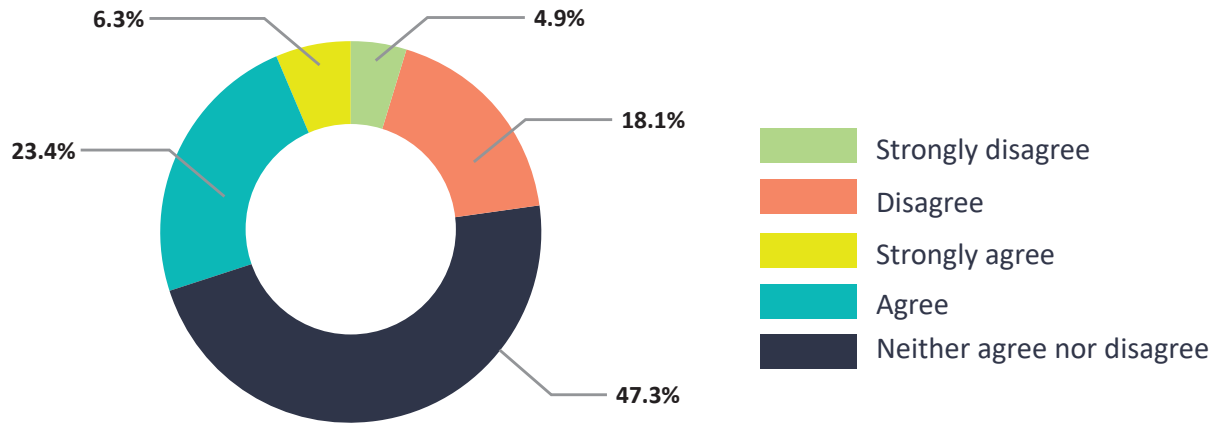


Table 18. Respondent level of agreement with the following statement, “The recent Section 503 regulations will lead to increased employment of people with disabilities in my organization/unit”

Level of agreement	Frequency	Percent
Strongly disagree	10	4.9%
Disagree	37	18.1%
Neither agree nor disagree	97	47.3%
Agree	48	23.4%
Strongly agree	13	6.3%

Conclusion

In the brief three-year time since the initiation of the Section 503 regulations, the results of this survey suggest that they have already had an important impact. Respondents to this survey of federal contractors report that their organizations have been setting targets/goals around the recruitment, hiring, retention and advancement of people with disabilities. Further, they are collecting data to understand progress toward their targets/goals including the 7% utilization goal, with a small proportion already meeting that goal. Despite challenges with implementation, contractors are responding to the regulatory changes by implementing disability inclusive policies and practices, and many believe that these efforts will increase the employment of individuals with disabilities in their organizations - the ultimate objective of the Section 503 regulations.

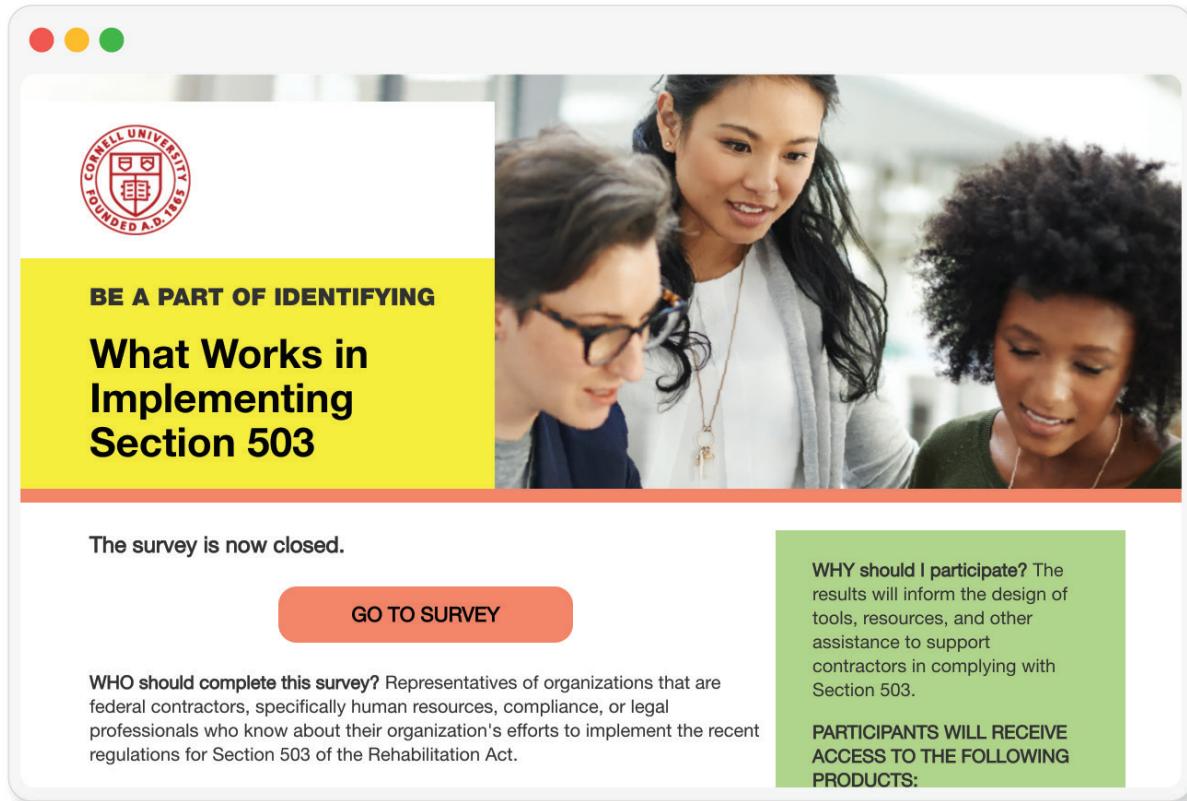
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Appendix A. Screenshot of survey landing page





BE A PART OF IDENTIFYING

What Works in Implementing Section 503

The survey is now closed.

[GO TO SURVEY](#)

WHO should complete this survey? Representatives of organizations that are federal contractors, specifically human resources, compliance, or legal professionals who know about their organization's efforts to implement the recent regulations for Section 503 of the Rehabilitation Act.

WHY should I participate? The results will inform the design of tools, resources, and other assistance to support contractors in complying with Section 503.

PARTICIPANTS WILL RECEIVE ACCESS TO THE FOLLOWING PRODUCTS:

Appendix B. Supplemental figures and tables

Figure B.1. Respondent organizational characteristics: type of organization, type of AAPs, and unit for which this responded to the survey

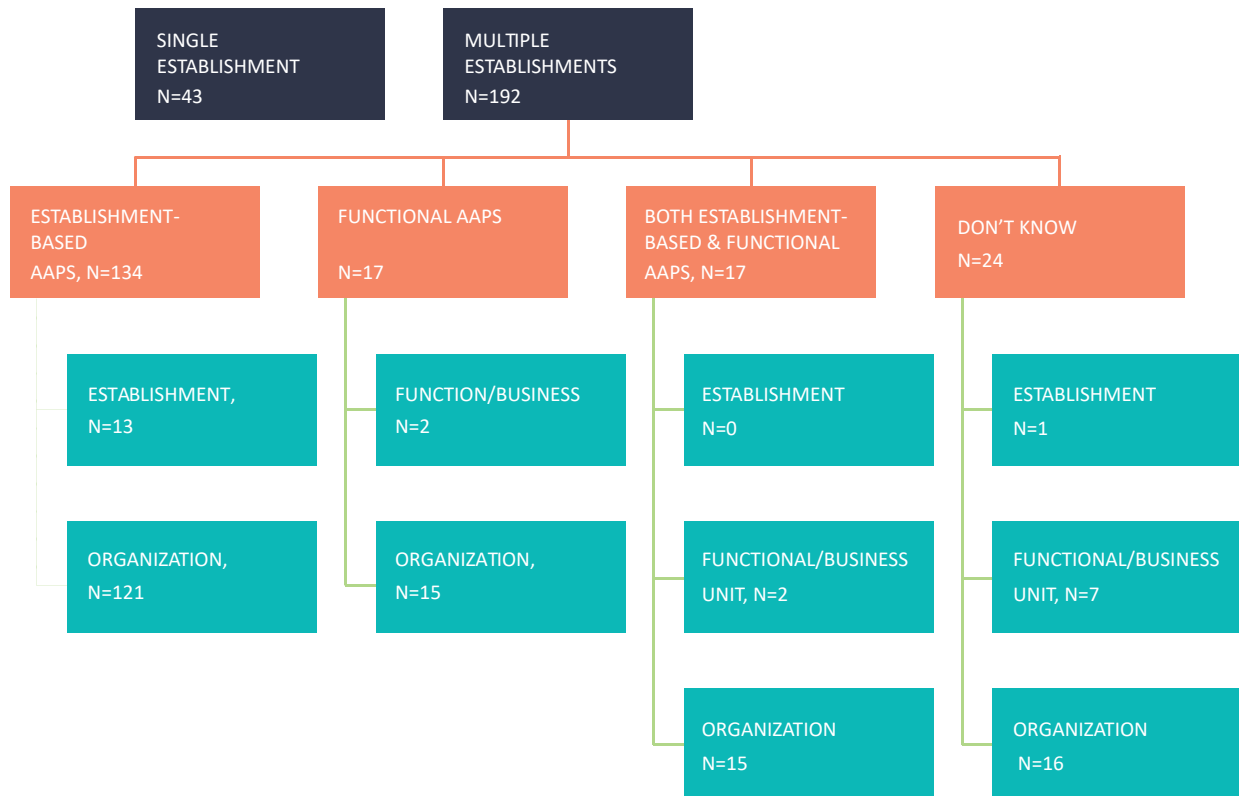


Table B.1. Additional characteristics of respondent organizations

Percent of total revenue from federal contracts	Frequency	Percent
0-24%	73	31.3%
25-49%	21	9.0%
50-74%	21	9.0%
75-100%	29	12.5%
Don't know	84	36.1%
Not applicable	5	2.2%
Total	233	100%

Table B.1. Additional characteristics of respondent organizations, continued

State(s) organization/unit is located in (Note: could select more than one, only states with 8% or more are presented, all states but South Dakota were represented)	Frequency	Percent
Nationwide	61	26.0%
California	44	18.7%
Texas	38	16.2%
New York	34	14.5%
Virginia	33	14.0%
Florida	31	13.2%
Illinois	29	12.3%
Pennsylvania	28	11.9%
District of Columbia	27	11.5%
New Jersey	23	9.8%
North Carolina	23	9.8%
Maryland	22	9.4%
Colorado	21	8.9%
Georgia	20	8.5%
Washington	20	8.5%
Massachusetts	19	8.1%

Table B.2. Number of respondents from the final sample from each recruitment source

Source organization	Frequency	Percent
National Industry Liaison Group	88	37.4%
DirectEmployers	58	24.7%
Yang-Tan Institute	48	20.4%
Employer Assistance and Resource Network (EARN)	31	13.2%
Washington DC Business Leadership Network (DCBLN)	5	2.1%
American Association for Access, Equity, and Diversity (AAAED)	3	1.3%
Job Accommodation Network (JAN)	2	0.9%
Total	235	100%

Note: Source was tracked via weblink, only those who were in the final sample are included, N=235

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