



THE FINANCIAL SERVICES ROUNDTABLE 
Financing America's Economy

**DOL Financial Services Sector Summit:
 “Profit by Investing in Workers with Disabilities”**

**Tuesday, July 19, 2011
 The Financial Services Roundtable
 Washington, DC**

Summary of Proceedings

Table of Contents

Background 2

Welcome and Introductions..... 2

Collaborative Context: Disability Inclusion Across the Enterprise..... 4

Holistic Approach Can Benefit Business..... 6

Successful Solutions: Spotlighting Current Practices to Recruit and Hire Civilians and Veterans with Disabilities..... 8

Luncheon Speaker 11

New Disability-Inclusive Diversity Lens: Focus Beyond Race and Gender 13

Return-to-Work; Return on Investment 16

Summary and Moving Forward: ePolicyWorks and White Paper..... 19

Closing Remarks..... 19

Appendix A: Participant List 20

Appendix B: Agenda..... 22

Background

Today, a confluence of events is compelling America's financial services sector to closely examine its employment practices. The economic downturn, aging of the workforce and advances in technology have all triggered a need for a paradigm shift relative to how the industry ensures it has the skills and talent to meet the needs of an increasingly diverse customer base in the coming years.

People with disabilities have an important role to play in this changing financial services landscape, in both the workplace and marketplace. However, as in other industries, the employment rate of people with disabilities in financial services remains low due to a range of barriers, both architectural and attitudinal.

Reflecting these realities, DOL's Office of Disability Employment Policy (ODEP), under the leadership of Assistant Secretary Kathy Martinez and in collaboration with The Financial Services Roundtable, convened the **Financial Services Sector Summit** on July 19, 2011 in Washington, D.C. Nearly 75 people participated in the invitation-only event, representing a diverse cross-section of stakeholders including employers, insurance companies and disability and business leaders. *(For a list of participants, please see [Appendix A](#)).*

In addition to the rich dialogue that transpired, the event itself was a milestone, marking the first time DOL/ODEP gathered thought leaders together to specifically explore the intersection between disability employment and financial services.

Welcome and Introductions

Steve Bartlett, President and CEO of The Financial Services Roundtable (the Roundtable), welcomed everyone and invited participants to introduce themselves. *(For a list of participants, please see [Appendix A](#).)* Following these introductions, he said his organization was delighted to collaborate with ODEP to host the event, noting that 20 years after the passage of the ADA, much work remains to be done and that he hopes the financial services sector can serve as a model industry relative to disability employment. He added that the purpose of the event was for participants to learn and share best practices within the industry, and that this collective knowledge would subsequently help inform a white paper to be distributed throughout the industry. He concluded with a brief overview of the Roundtable, sharing that it comprises 100 companies representing several million highly skilled employees across the globe.

John Dalton, President of the Roundtable's Housing Policy Council, which represents the mortgage side of the financial services sector, reiterated the Roundtable's commitment to partnering with ODEP and thanked participants for taking a first step in making the industry's workplaces more inclusive of people with disabilities, including veterans with disabilities. He noted that as a veteran himself who served as the 70th secretary of the Navy, he is acutely aware that today's veterans with disabilities are

facing challenges finding employment and feels optimistic about devising strategies to ensure they get the support they need. He concluded by thanking Steve Bartlett for his leadership, going back to his time as mayor of Dallas, Texas, and as a member of Congress, where he was critical in achieving passage of the Americans with Disabilities Act (ADA) in 1990.

Seth Harris, Deputy Secretary of Labor, said that Secretary of Labor Hilda Solis's vision of "good jobs for everyone" truly means everyone, including people with disabilities, and he thanked the Roundtable for hosting the event. He added that the day's gathering was the third in a series of such sector summits, with previous events addressing entertainment and health care. He then shared that in 2010, eight in 10 people with disabilities who were unemployed did not even seek employment because they felt the barriers were too many – a sobering statistic that translates into not only wasted talent but also wasted marketing opportunities, because people with disabilities represent a rapidly increasing customer base for American businesses. Disability employment is not about charity; it's about a broader definition of good business practices and helping employers understand the value of employees who are proven problem solvers with a demonstrated ability to adapt, he said. He then shared some concrete steps the Obama administration has taken to move the needle forward, including investing record amounts in education to ensure young people with disabilities are prepared to work.

Kathleen Martinez, Assistant Secretary of Labor for Disability Employment Policy, reiterated DOL's commitment to ensuring all Americans, including those with disabilities, can pursue meaningful employment and put their skills to work. She said that delivering on this commitment requires bringing new people into the discussion, such as the insurance and other companies in attendance, and educating employers that good workplace practices for people with disabilities actually benefit everyone. This issue will become increasingly important in the coming years, as demographic trends result in an aging workforce, she said. Employers must not view disability through a special lens, she added, but rather within the overall concept of diversity and inclusion. To assist in this paradigm shift, it's important that employers as well as individuals understand that accommodations are nothing more than productivity tools, and that everyone – whether they have a disability or not – uses them. She concluded by saying the purpose of ODEP's sector summits is to drive attitude change, and she looks forward to learning the role the financial services industry can play in doing so.

Following Assistant Secretary Martinez's remarks, participants watched a public service announcement (PSA) titled "I Can," which was created by the ODEP-funded Campaign for Disability Employment (CDE), a collaborative of several leading disability and business organizations that works to raise awareness of the skills and talents of people with disabilities. Featuring seven people with disabilities sharing what they "can do" in the workplace when given the opportunity, "I Can" works to challenge misconceptions and elevate expectations about disability employment, and it has earned significant donated media time since its release early last year. It is available online at www.whatcanyoudocampaign.org, along with accompanying discussion guides.

Collaborative Context: Disability Inclusion Across the Enterprise

Presenters: Michael J. Eastman, Executive Director, Labor Law Policy, U.S. Chamber of Commerce (Chamber), and Jill Houghton, Acting Executive Director, U.S. Business Leadership Network (USBLN)

Michael J. Eastman

As Executive Director of Labor Law Policy for the U.S. Chamber of Commerce, Michael J. Eastman works with members of the business community to develop labor and employment policy and advocates before Congress and administrative agencies. His focus areas include equal employment opportunity and civil rights, among other topics.

The U.S. Chamber of Commerce has been interested in the issue of disability employment for many years. Despite some challenges encountered since its passage in 1990, the business community strongly supports the ADA. Thus, when the Chamber was asked in 2007 to be involved in amending the law, it was curious to look at the stack of court decisions highlighting problems in implementation as we were eager to work together with disability advocates to improve it for both communities. While the Chamber represents businesses, throughout this process, it came to understand the legitimacy of one of the disability community's chief concerns – that many people who Congress had intended to be covered by the ADA were not being covered. This concern and other factors made the Chamber want to be at the negotiating table. The result was the ADA Amendments Act of 2008, and the Chamber is pleased to be associated with it.

When it comes to improving disability employment, the non-discrimination provisions in the ADA are only one piece of the puzzle. Productivity and talent are the others. Even in today's economy, many businesses in the financial and other industries are experiencing skills shortages, yet many employers remain unaware of the untapped pool of qualified candidates with disabilities. They either don't know how to reach them or they're intimidated by perceived costs of accommodations, or both; there are too many myths and stereotypes.

To help employers understand the value and talent people with disabilities offer, the Chamber joined forces with the U.S. Business Leadership Network (USBLN) in April to host the *Corporate Disability Employment Summit: Leading Practices on Disability Inclusion*. At this event, Chamber president Tom Donahue told participants that companies that lead in employing people with disabilities are positioning themselves for success in the future, when worker and skills shortages make hiring a necessity and not a choice. As part of this event, the Chamber and the USBLN developed a booklet that profiles practices many successful companies have implemented to include people with disabilities in not only the workplace, but also the marketplace. This booklet is available online at www.usbln.org. Many of the practices highlighted are replicable in other organizations and industries, and contact information for each company is provided.

The Chamber is also partnering with DOL's Veterans' Employment and Training Service (VETS) and the Employer Support of the Guard and Reserve (ESGR) on the Hiring Our Heroes program, which began in March 2010. This initiative focuses on finding meaningful employment for veterans, including those with disabilities, and their spouses by matching talents with career opportunities in the private sector. The central component of this program is a series of 100 job fairs across the nation. Information about upcoming events is available at www.uschamber.com/veterans.

Jill Houghton

In leading the USBLN, Jill Houghton helps to build workplaces, marketplaces and supply chains where people with disabilities are respected for their talents and supports the development and expansion of state and local affiliate BLNs.

A recent article in Insight into Diversity magazine articulated both the distinction and overlap between two words: diversity and inclusion. Diversity is a reality, while inclusion is a choice, the article explained, and whether this choice lies with an individual or an organization, it sets an important tone. That's why in April 2011, USBLN and the Chamber partnered to host the *Corporate Disability Employment Summit: Leading Practices on Disability Inclusion*. The word inclusion was used consciously; the goal was to identify what companies are doing to improve not just the diversity of their workforce by hiring people with disabilities, but disability inclusion across the business enterprise, for example in the marketplace and supply chain.

The aforementioned booklet developed as part of this event, *Leading Practices in Disability Inclusion*, highlights several key themes:

- *Employee Resource Groups (ERGs) help advance the business case for hiring people with disabilities.* While in the past many disability ERGs focused mainly on disability awareness, some are now maturing to push the business case internally for disability inclusion, in a similar manner that ERGs focused on women or minorities did in the past.
- *What gets measured gets done.* Thus, when companies include disability in their diversity and inclusion strategies, and these strategies are aligned with articulated business goals, the results are stronger. One example of a company that has been specific in articulating actual goals in numeric terms is Walgreens.
- *Partnerships are essential to success.* Each company needs to identify the partners that can best help them meet their needs. Examples include Career Opportunities for Students with Disabilities and state Vocational Rehabilitation (VR) programs. (The Council of State Administrators of Vocational Rehabilitation can assist employers in navigating their state's VR programs.)
- *Accessibility goes beyond the physical environment.* Companies inclusive of people with disabilities continually assess accessibility related to not only physical facilities, but also technology. One example of a comprehensive approach to accessibility is Ernst & Young's accessibility survey, which has been adapted for use by other companies.

- *Disability inclusion goes beyond employment.* Disability inclusion makes companies more welcoming to not only employees with disabilities, but also customers or clients with disabilities. For example, Nordstrom's wide aisles make it accessible to people who use wheelchairs or other mobility aids. The company also features people with disabilities in its catalog.

As part of its efforts to increase disability inclusion across the business enterprise, USBLN launched the Disability Supplier Diversity Program® (DSDP), the nation's first and only certification for disability-owned businesses. The Women's Business Enterprise National Council's (WBENC) and National Gay and Lesbian Chamber of Commerce's (NGLCC) certification programs served as models for the DSDP, which offers businesses owned at least 51 percent by individuals with disabilities, including service-disabled veterans, increased access to potential contracting opportunities with major corporations, government agencies and each other. It has particular importance since many people with disabilities become entrepreneurs because of the barriers to traditional employment. Since people with disabilities are more likely to hire people with disabilities, this program has potentially significant impact.

Holistic Approach Can Benefit Business

Presenter: Michael Shriver, Business Support Executive for the Global Corporate Social Responsibility Team, Bank of America

As Business Support Executive for Bank of America's Global Corporate Social Responsibility Team, Michael Shriver oversees key operational, business, support and strategic issues. This includes managing the company's Support Services division, which offers services such as printing, design and packet fulfillment to company facilities across the nation, while employing nearly 300 individuals with intellectual disabilities.

Mr. Shriver has been involved in efforts to advance disability employment for more than 40 years, first with non-profits and now at Bank of America, which actively works to foster a corporate culture that values each individual for their differences. Bank of America believes that diversity and inclusion are good for business, providing an advantage in understanding the diverse customers and communities it serves.

Participants viewed a brief video elaborating Bank of America's commitment to diversity and inclusion.

Bank of America's diversity and inclusion initiatives incorporate disability, and the company's Support Services division focuses on the employment of people with intellectual disabilities in particular. It employs 300 people in different facilities and offers services such as printing, design and packet fulfillment to Bank of America facilities nationwide. These facilities do not have to use Support Services; they can outsource such services. However, the department's goal is to become Bank of America's internal supplier of choice based on exemplary service. A unique feature of the department is that it provides its own job coaching to employees.

Bank of America's culture of diversity and inclusion starts at the top, and leadership has been very supportive of Support Services. Other examples of Bank of America's efforts to advance disability inclusion include:

- Strong internal and external partnerships
- A disability-focused ERG
- Dedicated military recruiting programs, including targeted efforts at wounded warriors and internal training for recruiting veterans, including veterans with disabilities
- Accommodation support, including information on the accommodation process and the ADA on the company's Intranet
 - For people with visual impairment, information in alternative formats and access to appropriate assistive technology
 - For people with hearing impairments, TTY, sign language interpreters
- The Disability Affinity Group (DAG), which has strong support from the CEO, who previously served as its sponsor. Originally focused strictly on employees with disabilities, DAG broadened its scope to any employee affected by disability and today has more than 1500 members and local chapters across the nation as well as in Canada and London. In addition to other activities, these chapters partner with different groups to sponsor various events such as career days and student leadership summits. They also help assess accessibility of new facilities.

Bank of America is also committed to increasing disability inclusion in the communities it serves through philanthropic efforts. For example, it partners with the National Disability Institute (NDI) to provide tax assistance for people with disabilities through the Real Economic Impact (REI) Tour. Many DAG members have volunteered as part of this program. The company also has a long-established relationship with Special Olympics, which it supports through both financial assistance and employee volunteerism. In fact, several Bank of America employees competed in the recent world games in Greece.

Bank of America's approach reflects its unique organizational needs and culture, but all companies can play a role in supporting people with disabilities. Much can be learned by sharing experiences and models that may be replicated across the industry.

Participants viewed a video providing an overview of Bank of America's Support Services division. It featured vignettes of individual employees talking about their work and organizational commitment.

Questions and Discussion

- A participant asked if Bank of America and other companies typically use nonprofit organizations for intake, recruitment and training or whether they handle those functions in house. The following discussion ensued:
 - Bank of America has developed partnerships with a number of nonprofits over the past 15 years for recruitment, but it also sometimes bypasses

nonprofits and works directly with VR. However, a conscious decision was made to not have nonprofits provide job coaching; rather, Bank of America provides its own.

- Occasionally, nonprofits might be consulted if there are problems not at work, but that might be affecting work. In this way, they essentially serve as EAPs with whom Bank of America has a business arrangement.
- Examples of nonprofits Bank of America partners with include the ARC in Delaware and VR in Dallas. In Maine, where one of its Support Services facilities is located, has proven more challenging. A number of companies successfully partner with their state VR agencies; a good way to explore this option is to contact the Council of State Administrators of Vocational Rehabilitation.
- Another option for exploring potential partners is to contact other companies and ask who they've had success with; when setting up in Dallas, Bank of America received assistance from Walgreens.
- USBLN affiliates around the country sometimes have events to which nonprofits are invited to share their visions, so that employers can get a sense of which may fit their needs. As part of this, representatives from the nonprofits might tour the employer's facility and learn about the types of skills they need. From there, one-on-one meetings might be set up to explore the feasibility of a partnership.
- There is an opportunity for the disability community, especially Independent Living Centers, to profit by partnering with employers to provide people with needed skills. However, care must be taken to ensure such opportunities are for competitive employment, earning at or above minimum wage. Employees in Bank of America's Support Services are paid on the same scale as people throughout the bank, with the same benefits, so everyone is above minimum wage. It is important for people with disabilities to get out of an outdated mindset of only low-earning jobs with little potential for advancement.
- Paradoxically, higher earnings can create problems. On occasion, Bank of America has had service providers and family members of employees with disabilities ask if pay could be reduced in order to not affect the employee's disability benefits. This also reflects an outdated mindset, because there are now several options (such as Section 1619(b) of the Social Security Act, which has been in existence since 1988) for maintaining benefits while earning a competitive wage; however, there is a need for more education on these work incentives.

Successful Solutions: Spotlighting Current Practices to Recruit and Hire Civilians and Veterans with Disabilities

Facilitator: Susanne M. Bruyere, PhD, CRC, Associate Dean of Outreach and Professor of Disability Studies, Cornell University

In her multi-faceted role at the Employment and Disability Institute (EDI), part of Cornell University's School of Industrial Labor Relations, Susanne M. Bruyere works to advance knowledge, policies and practices that enhance disability employment through a range of projects, educational activities, research, publications and technical assistance.

One of EDI's projects is the National Employer Technical Assistance Center, a collaborative that researches, influences and develops inclusive employer practices and policies. As part of this, it manages the Employer Assistance and Resource Network (EARN), which helps employers hire and retain workers with disabilities. The EARN website's (www.AskEARN.org) Employer Reference Desk is a good resource for companies seeing information about disability employment and strategies for fostering an inclusive work culture.

When it comes to disability employment, companies need to think not only about hiring, but also the entire employment spectrum. Some of these considerations include:

- Recruitment, hiring and the on-boarding process
- Accommodations
- Career advancement and professional development
- Retention and inclusion
- Measuring effectiveness
- Resources for the future – such as online recruitment

Reasons for focusing on disability employment in a broad context include:

- People with disabilities are a largely untapped labor source
- Significant employment and economic disparities between people with and without disabilities persist
- Accommodations are becoming more prevalent as the workforce ages
- Disability inclusiveness is a global issue

There are varying estimates of the prevalence of disability. A broad overview is as follows (more information is available at www.disabilitystatistics.org):

- 1/5 to 1/10 of the U.S. population, depending on survey used
- American Community Survey (ACS) says 12.4 percent of women and 11.7 of men in 2008 (self-reported)
- Globally, average is 10 percent of population, but this figure is assumed to be low since many countries' survey efforts do not reach all areas

Statistics (from 2008) related to employment include:

- About 40 percent of people with disabilities were employed, compared to about 80 percent of people without disabilities
- The median income of people with disabilities who were employed was 39,600, compared to 61,200 for people without disabilities
- 25.3 percent of people with disabilities were living below the poverty line

The American workforce is aging, as evidenced by:

- Between 1977 and 2007, the employment of workers 65 and older increased 101%
- Between 1995 and 2007, the number of older workers working full-time doubled

As this trend is expected to continue, and prevalence of disability grows with age, disability is something that will increasingly impact all companies. Furthermore, it's becoming a global issue, and the United Nations Convention on the Rights of Persons with Disabilities, which is legally binding in 99 countries as of April 2, 2011, may help multinational companies ensure good practice transferability.

When it comes to the first steps in the employment process – recruitment, hiring and onboarding – employers need to think about accessibility in more than just the context of the physical environment. Application processes, interview procedures, and orientation and training must all be made accessible to people with a range of disabilities.

To assist in recruitment, employers need to develop partners within their local community. Networks such as those overseen by DOL and state VR systems can assist. Other good sources include disability student services offices at local colleges and universities and veterans placement services. There is an extensive list of such resources online at www.AskEARN.org.

Once employees are on staff, accommodations are simply part of effective human resources practice. The accommodation process should be ongoing, interactive and relevant to all steps in the employment lifecycle, from recruitment and hiring to professional development. Assistance on accommodations for employers and employees is available from the Job Accommodation Network (JAN) (www.AskJAN.org) as well as EARN.

Professional development activities should incorporate all employees. Furthermore, the same performance standards should be applied relative to career advancement and performance and should be assessed regardless of accommodation.

To infuse inclusion into their workplace culture, employers should develop diversity goals that incorporate disability and institute diversity education for all employees. ERGs are also a very effective strategy. A new ERG toolkit can help employers learn about how to implement a disability-focused ERG.

Measuring effectiveness in implementing the above strategies creates challenges due to confidentiality concerns; however, it's important to do so to the extent possible.

In addition to technical assistance on hiring and retaining workers with disabilities, EARN provides private employers access to the Workforce Recruitment Program (WRP), an internship program for qualified college students and recent graduates with disabilities seeking summer internships or permanent employment.

Sara Mahoney from ODEP provided an overview of the WRP, noting that this year, 277 colleges and universities participated, resulting in more than 2,200 students in the database. Students in the WRP database go through an extensive pre-screening process and represent a wide variety of majors and include law and MBA students. Overall, the program targets high achievers. Private employers can call EARN to access the database; a representative will search on their behalf and provide relevant resumes. Last year, Prudential hired a Georgetown University student who was eventually offered permanent employment. The WRP database is released in December in order to line up with summer internship recruitment timelines.

Alan Muir provided an overview of Career Opportunities for Students with Disabilities (COSD), another source for information about qualified college students and recent graduates with disabilities. Housed at the University of Tennessee, Knoxville, COSD was formed in 1999 to fill the gap between the disability student services and traditional career services functions; today it comprises more than 650 higher education institutions and 600 employers. Its two primary focus areas are working with: 1) campuses to ensure they prepare students with disabilities to be competitive in recruitment, and 2) employers to ensure students with disabilities are on their radar. COSD's 12th annual conference is scheduled for November 3, 2011 in Morristown, NJ. The day after this conference is COSD's FULL ACCESS Student Summit, a networking event that will offer about 60 regional students a chance to meet with 10 employers. A similar event is planned for April 2012 in San Jose, CA and will be supported by Cisco. Another aspect of COSD is the Career Gateway, the only online nationwide database and job posting service focused on recent graduates with disabilities. More information is available at www.cosdonline.org.

Questions and Discussion

- ODEP-funded technical assistance centers, including EARN and JAN, are open to all and provide free, confidential, one-on-one assistance by phone or e-mail.
- Another way disability inclusion can be infused into workplace culture is to incorporate it into business school curricula. One example of a school doing this is the University of New Mexico's Anderson School of Management. Taking a different approach, UCLA's Anderson School of Management offers a leadership training program for managers with disabilities to assist them in advancing up the corporate ladder.
- Career services offices on college campuses are not always in tune with students with disabilities; when this is the case, disability student services should be able to help. The Association on Higher Education and Disability (AHEAD) is a professional membership organization for individuals dedicated to ensuring the provision of quality services to meet the needs of people with disabilities in all areas of higher education. On the organization's website, www.ahead.org, there is a list of regional affiliates, each of which offers a list of member schools and representatives whom employers can contact to explore partnerships.

Luncheon Speaker

Ray Jefferson, Assistant Secretary of Labor for Veterans' Employment and Training

As head of the Veterans Employment and Training Service (VETS), Ray Jefferson works to assist and prepare veterans and service members for meaningful careers, maximize their employment opportunities and protect their employment rights.

At VETS, it's the best of times and worst of times – but the goal to transition is a positive trend. The negative news is that the unemployment rate among veterans is 8.8 percent, with the number as high as 13.1 percent for veterans who have served since September 11, 2001. The positive news is that VETS, in collaboration with related agencies and organizations, is making significant progress on efforts to improve these numbers.

These efforts incorporate veterans with disabilities, including non-visible disabilities such as Post-Traumatic Stress Disorder (PTSD) and Traumatic Brain Injury (TBI). One person who exemplifies the importance of integrating disability into veteran employment and training efforts is Tanya Gauthier, a West Point cadet who is interning with Assistant Secretary Jefferson this summer. Ms. Gauthier's professionalism and positive attitude exemplify the mission-focused culture of the armed forces and the benefits private employers have to gain when service members transition to civilian employment. She also has a disability; she is a TBI survivor.

Ms. Gauthier shared her personal story of being in a nearly fatal car accident during her junior year at West Point. Following the accident, she was in a coma for two weeks with little indication as to whether or not she would survive. As she regained consciousness and began an arduous year of rehabilitation, her physicians advised her to not return to West Point because it would be too difficult. She declined the advice, saying she wanted to get back to serving her nation. She is very grateful for the support West Point provided, allowing her to take the year off for therapy and recuperation and return when she was ready. Having already passed many of the challenges of the West Point experience, including second-year field training at Camp Buckner, she had developed a soldier's spirit and wanted to complete the mission.

When Assistant Secretary Jefferson arrived at VETS, he was dissatisfied with what he found. VETS' mission has three components: 1) to prepare veterans for meaningful and successful careers, 2) to increase veterans' access to employment opportunities, and 3) to protect veterans' employment rights. If any of these three "legs of the stool" are broken, the agency can't be effective.

One significant effort VETS has been working on is the military's Transition Assistance Program (TAP), a voluntary program in which most transitioning service members participate. TAP hasn't been modernized in almost 20 years, and while the curriculum might have worked at one time, it simply does not now. To bring it up to date with the realities of the job market today's veterans are entering into, VETS staff have been working with experts in career transition, including some from other countries with good track records of military to civilian employment transition.

Scheduled to launch on Veterans Day of this year, the new TAP will be customized to individual transitioning service members, whereas it used to be "one size fits all." It will start with a self-assessment in advance of separation. Based on this self-assessment, people will be grouped with cohorts with similar career goals, and all content will be

based on adult learning principles. Individuals will develop their own learning plan and have access to customized coaching for 60 days. This follow-up approach has never been done before. The program will also be available online so that individuals can take part when their schedule permits.

Another new aspect of the program will be the gathering of performance measurements. The goal is a world-class program to assist transitioning service members in pursuing their career aspirations in the civilian workforce.

In addition to working to modernize TAP, VETS has been partnering with organizations such as the Society for Human Resource Management (SHRM) and the U.S. Chamber of Commerce to hold veterans hiring fairs. These events are critical in reaching out to veterans one-on-one and connecting them with opportunities. One such fair held in June in New York focused on the financial services sector. VETS is also working with SHRM to develop a toolkit focused on veterans hiring.

When it comes to veterans and employment, most employers want to do the right thing, but many do not know how. Through a variety of outreach efforts, VETS is working to make them aware. First Lady Michelle Obama and Dr. Jill Biden are supporting these efforts and helping to raise awareness through the Joining Force initiative, which aims to mobilize all sectors of society to give our service members and their families the opportunities and support they have earned.

Questions and Discussion

- A participant asked what the first steps in implementing a veterans hiring initiative should be. Assistant Secretary Jefferson said they should use the Veterans hiring toolkit when it comes out in November, and until then, they should go to the VETS website (www.dol.gov/vets) and access the state map and contact a Director of Veterans Employment and Training (DVET) in their state. It's also advisable for employers to identify a point person within their organization to serve as a veterans' representative and broadcast the company's desire to hire veterans through a variety of channels. One example of such a point person is Prudential's Steve Robinson, who goes to hiring fairs and puts out press releases about the company's interest in veterans. Another good resource is the America's Heroes at Work website (www.americasheroesatwork.gov).

New Disability-Inclusive Diversity Lens: Focus Beyond Race and Gender

Facilitator: Justin Nelson, Co-Founder and President, National Gay and Lesbian Chamber of Commerce (NGLCC)

Justin Nelson co-founded the NGLCC in 2002 and today serves as its president, helping to give an economic identity to America's LGBT community. Since its inception in 2002,

the NGLCC has become the world's largest LGBT economic advocacy and business development organization.

NGLCC has been happy to partner with both ODEP and USBLN in recent years around the issue of disability, which of course impacts people regardless of race, ethnicity, gender or sexual orientation. As with these and other characteristics, disability is part of the natural diversity of life and therefore must be woven into the fabric of the workforce.

Furthermore, the disability community is a market segment – a trillion dollar one – and it should be okay to acknowledge such. In this and other ways, there are similarities between the LGBT and disability communities. As an example, someone might be the only person in their family who is gay or has a disability. Also, research indicates that someone who is gay spends a significant amount of time worrying about discrimination at work; this may be the case for someone with a disability as well. From a social perspective, this stress is plain wrong, and from a business perspective, it equates to lost productivity.

Mr. Nelson asked participants if they knew of a person with a disability who is in senior management at their company. About five hands went up. He then asked if any participants have a specific disability-focused program within their company's human resources department. Several hands went up, and the following example was specifically shared:

- TD Bank has a fairly new initiative that has accomplished a lot in a short time. While the company is in compliance with the ADA, it wanted to do more in order to foster a culture inclusive and welcoming of people with disabilities. As part of this, it had an outside consultant conduct an assessment. It is also holding events to inform employees that it's okay to talk about disability and ask for accommodations. It is also going to expand the concept of accommodations to productivity enhancement tools, as discussed in previous presentations.

Mr. Nelson asked if any of the companies represented make accommodations for online employment applications and, if not, whether today's discussions have helped them consider the importance of doing so. The following discussion ensued:

- US Bank embraced Section 508 compliance early on because of its status as a Federal contractor. The process started with online banking and then naturally segued to hiring and other human resources processes.
- In many ways, online accessibility is the electronic "curb cut" of today – it's essential for people with disabilities to get into the door, figuratively. A company's website is its virtual front door.
- At US Trust, which is part of Bank of America, all teams have diversity performance goals, and as part of the company's on-boarding process, new employees are provided information about all ERGs and the company's culture of inclusion.
- Every year, Lincoln National Corporation provides its managers with an updated packet of materials, and within this packet is information on the accommodation process. The company also has leadership expectations (once

called competencies) related to diversity and inclusion. As part of these expectations, each leader is asked to create and sell something around diversity and inclusion, in both the workplace and the marketplace.

Mr. Nelson asked if any companies represented measure disability hiring. The following conversation ensued:

- SunTrust measures diversity in a broad context, but it does not specifically measure any one group. During on-boarding, employees do have the option to bring disability up, but it's likely that applicants may not be comfortable doing so during the recruitment process.
- TD Bank asks about disability in an attempt to measure, but it's important to note that information is self-identified, so the results may not be accurate.
- In general, measuring creates challenges due to privacy and self-disclosure issues. Employers need to be careful in how they craft and word surveys because questions can be asked in a way that makes the employee question intent. However, accurate data can really assist in advancing the business case for hiring people with disabilities by showing the extent to which disability is already represented within the workforce.

Other practices shared by participants included:

- IBM (a company not represented at the summit) sends an important message about disability inclusion early in the on-boarding process by incorporating employees with disabilities into its orientation training videos and such. They also use this approach to signal a welcoming environment for LGBT employees.
- US Trust developed a leave-behind for hiring events that focuses on its disability efforts.
- One participating company uses the term respect instead of diversity. It's expected that everybody in management is required to treat everyone else with respect, and that this respect is measured not by what someone meant to say, but by what someone heard. In this environment, if anyone feels badly about something they were told, the direct supervisor needs to address the issue that day and reformat the conversation.
- Diversity means all fibers of an organization, including the revenue stream. ERGs may be given goals to go out and bring a particular community into the organization's customer base. On this, the LGBT community has come further than the disability community in recent years. It looked to the women's community for guidance and learned that the key was to highlight itself as the large market that it is. The disability community should do the same.

Mr. Nelson asked about efforts to ensure that youth with disabilities have opportunities to pursue their career aspirations, whether in financial services or any other industry. The following examples were shared:

- Fifth Third Bank participates in Project SEARCH, a work-experience program for transitioning high school students with disabilities. This program is implemented in partnership with Cincinnati schools and Great Oaks VR.

- ODEP developed an internal educational curriculum for its interns, because it found that a large number arrived lacking in the “soft skills” necessary to succeed at the agency. This curriculum has been replicated by other agencies in DC with a large number of rotating interns, such as the US Department of Education and the Federal Emergency Management Agency (FEMA). ODEP also recently developed a soft skills curriculum for use by educators and workforce development professionals to assist students with and without disabilities prepare for the world of work. This curriculum is available online at www.ncwd-youth.info, the website of the ODEP-funded National Collaborative on Workforce and Disability for Youth (NCWD/Youth).
- Bank of America does mock interviews with transitioning students in various communities to help them prepare for the job application process.
- COSD works with students to polish their resumes and include keywords that are in job descriptions in order to succeed in electronic keyword searches.

Return-to-Work; Return on Investment

Presenters: Maureen Griffin, Regional Vice President, Benefits Operations, Unum, and Neil Jacobson, former Senior Vice President, Systems Automation Management and Wireless Technology Divisions, Wells Fargo

Maureen Griffin

Maureen Griffin is Regional Vice President of Benefits Operations at Unum, a private insurer that sells disability products. As part of this role, she co-leads the Vocational Strategy Initiative, which supports efforts in returning employees to work after injury or illness.

Unum sells individual disability insurance to protect the workforce of employers in the event someone becomes impaired or disabled and is no longer able to stay in the workplace. Its philosophy with regard to return to work is to focus on what people can do as opposed to what they cannot, and the company has implemented a number of related strategies over the last couple of years that are proving highly effective.

Overall, within six months of being out of the workplace, 50 percent of Unum’s long-term disability claimants or employees who are out of the workplace are back at work either in their previous occupation or in a new one with retraining, if appropriate. Of those 50 percent who do not succeed in returning to work within six months, the rate of eventual return to work is 17 percent, which is fairly significant given the rapidly aging workforce.

Unum’s customers are employees who are out of the workforce due to an accident or illness. For the most part, they are highly-skilled, middle wage earners in industries such as manufacturing, education, health care and technology, among others. In supporting them and assisting them to return to work, Unum looks at their functional

capacity. To do this, Unum uses a clinical, vocational and medical model that could be replicated by other insurers in both the private and public employment arenas.

When a precipitating event occurs, such as an illness or accident, an employee has the opportunity to file either a short-term or long-term disability claim. Long-term claims are where Unum has found it's really making a difference relative to return to work. Once someone files, the company works to understand from an occupational perspective what the person's job duties were and assesses their medical condition. The goal is then to restore the person to his or her functional capacity.

Unum is the industry leader in developing this clinical, vocational and medical model to assess and evaluate disability. It has invested significant resources in physicians, VR counselors and nurses to come together as a unified team to work with the company's disability benefits specialists in the interest of getting people back to work. It has about 50 VR counselors, a ratio of about one for every 12 disability benefits specialists.

Unum depicts the return to work process as a staircase, with VR counselors involved from the very start, exploring and clearly understanding what the occupational duties are that the employee was engaged in prior to the injury or illness. There is direct and ongoing communication between the VR counselors, benefits specialists, employers and employees. In addition, nurses work closely with the benefits specialists, looking at all medical records with a focus toward understanding when there is a gain in someone's capacity. They follow the claim along its lifecycle. Rounding out the team are physicians, including psychiatrists, orthopedists, cardiologists and neuropsychologists, who all work together in order to fully and clearly understand the medical aspects of each employee's condition and put this information into the occupational context.

Related to this aspect of Unum's model, the company's chief medical officer has spoken at Massachusetts General Hospital, Johns Hopkins, Baylor and other premier medical institutions in an effort to make other physicians aware of how to assess, evaluate and motivate employees who are out of the workplace. In fact, the national licensing board for physicians is looking at adding such information as part of the licensure process. The ultimate goal is to help physicians see disability in a new way, one that helps patients with disabilities move forward as opposed being treated from a clinical perspective.

Unum's return-to-work process is a four-part, phased approach. These phases include:

- Assessment (information gathering and discussion among various parties);
- Analysis of information gathered;
- Development of return-to-work plan based on occupational, medical and motivational factors; and
- Support and implementation of the plan.

The goal of this process is for individuals to either stay at work or return to work. What Unum has found is that early intervention appears to be absolutely critical to success. A significant amount of this process relates to human behavior, not just medical or

occupational factors. Getting people back to work aids in their recovery and benefits employers as well society at large. In this way, Unum's return-to-work processes work against an outdated disability mindset. Rather, a return-to-work mindset is emphasized from the start, from the first phone call from an individual filing a disability claim. Key to this is evaluating functional capacity and matching it with restrictions and limitations. Return-to-work components may mean worksite or schedule modifications.

In the event someone is unsuccessful in transitioning back to the workplace over the course of the six-month period, they come back on claim. So, the process is a no-lose situation for individuals.

Neil Jacobson

Neil Jacobson is a former Senior Vice President of Systems Automation Management and Wireless Technology Divisions at Wells Fargo and today manages Abilicorps, a California-based disability-focused employment company with expertise in profiling and recruiting skilled workers with disabilities.

One of the most important technologies Mr. Jacobson uses on a daily basis was developed by the financial services sector – a credit card. He has a speech impediment due to cerebral palsy, and while many people he interacts with have trouble understanding what he says verbally, they always understand what he wants when he pulls out his credit card.

Mr. Jacobson had a long and successful career as a computer programmer with Wells Fargo, where he worked his way up the corporate ladder. In his various roles, he always found that communication challenges were quickly worked through when there was a technology emergency, such as a systems crash; focusing on the bottom line can be a great equalizer.

Reflecting this, one reason the unemployment rate among people with disabilities is so high is because many employers mistakenly believe that people with disabilities don't have money. Other diverse segments have done a better job of demonstrating that they are an important market share; the disability community needs to do the same. For too long, people with disabilities have been seen as a charity issue, not an economic force. But, especially when you add in friends and family, they truly are. Recently, Wells Fargo started a marketing team focused on disability; hopefully more companies will follow suit.

Questions and Discussion

- A participant asked if Unum has seen changes in success over time. Ms. Griffin responded yes, that the company has been measuring since the implementation of its clinical vocational strategy and has seen increased rates of people returning to work. Another participant asked if these measurements are broken down by occupation. Ms. Griffin was not aware if they were but would attempt to find out. Another participant said it would be helpful if Unum could quantify how

- much money Unum has saved in terms of getting people off of disability benefits and back into the workplace.
- Several participants reiterated Mr. Jacobson's assertion that the disability community needs to follow the lead of other diverse segments in positioning itself as an economic market, noting that doing so requires a paradigm shift in how disability and people with disabilities are perceived.

Summary and Moving Forward: ePolicyWorks and White Paper

Brian Tate, the Roundtable's Vice President of Banking wrapped up the day's presentations by remarking that the Roundtable is proud to be working with USBLN and other organizations around the issue of disability and to have partnered with ODEP to host the day's summit. To further develop the dialogue and advance this issue further within the financial services industry, the Roundtable wants to engage everyone in the room in the development of a white paper outlining best practices and recommendations going forward.

ODEP Policy Advisor Mike Reardon then introduced participants to ePolicyWorks, an online collaborative workspace developed and managed by ODEP that will be used to facilitate the development of the aforementioned white paper. Unless they specifically wish not to be involved, all participants at the Summit will be registered for access to the accessible, secure, password-protected workspace. Mr. Reardon encouraged people to participate in the paper's development because it represents a first step in working toward stronger public policy around disability and employment. Further information and training on how to use ePolicyWorks will be forthcoming.

Closing Remarks

Assistant Secretary Martinez ended the summit by reiterating that the biggest barrier people with disabilities face in employment is attitude, and that attitude is "caught, not taught." She hopes management in the financial services sector will recognize this and do their part to model and promote positive workplace practices that advance disability inclusion. She also shared that attitude change is the premise of National Disability Employment Awareness Month (NDEAM). Held each October, NDEAM is a national campaign that raises awareness about disability employment issues and celebrates the many and varied contributions of America's workers with disabilities. Apropos to the themes discussed at the summit, the theme for NDEAM 2011 is "Profit by Investing in Workers with Disabilities."

Appendix A: Participant List

**DOL Financial Services Sector Summit:
“Profit by Investing in Workers with Disabilities”
Tuesday, July 19, 2011
The Financial Services Roundtable**

Participant List

| <i>Name (A-Z by last name)</i> | <i>Organization</i> |
|--------------------------------|--|
| Anne Aichele | AHEAD |
| Byron Anderson | Aegon |
| Steve Bartlett | The Financial Services Roundtable |
| Kristyn A. Berger | Columbia Bank and Fulton Financial |
| Debbie Bianucci | BAI |
| Erica Bloomer | SunTrust |
| Brenda Bowen | The Financial Services Roundtable |
| Deb Brucker | Fifth Third Bancorp |
| Susanne M. Bruyere | Cornell University |
| Judy Chapa | The Financial Services Roundtable |
| Steve Clayburn | American Council of Life Insurers |
| Cindy Cleveland | First Horizon National Corporation |
| Patrick Cokley | DOL/ODEP |
| Chuck Conaty | DOL/ODEP |
| Sam Cornale | DOL/OSEC |
| John Dalton | The Financial Services Roundtable’s Housing Policy Council |
| Carol Dunlap | DOL/ODEP |
| Michael Eastman | US Chamber of Commerce |
| Mark Feinour | Bank of America Corporation |
| Matthew Ferger | Student Veterans of America |
| Doug Fitzgerald | DOL/OWCP |
| Allison Green | Lincoln National Corporation |
| Tanya Gauthier | DOL/VETS |
| Maureen Griffin | Unum |
| Barbara Haight | DOL/ODEP |
| Laura Haines | Hartford |
| Seth D. Harris | DOL/OSEC |
| Todd Hill | The Financial Services Roundtable |
| Anne Hirsh | Job Accommodation Network (JAN) |
| Jill Houghton | US Business Leadership Network |
| Neil Jacobson | Wells Fargo/ Abilicorps |
| Ray Jefferson | DOL/VETS |
| Paula Kelly | US Trust |
| Zareen Khan | The Financial Services Roundtable |
| Katheryn King | US Bank |

| | |
|--------------------|---|
| John Legrand | JPMorgan Chase |
| Claire Maggio | The Financial Services Roundtable |
| Sara Mahoney | DOL/ODEP |
| Kathleen Martinez | DOL/ODEP |
| Susan Mason | SunTrust |
| Marty McGuinness | Unum |
| Ray Messina | Discover Financial Services |
| Paula Meyerson | SunTrust |
| Colet Mitchell | DOL/ODEP |
| Alan Muir | Career Opportunities for Students with Disabilities |
| Joseph Mullins | DOL/VETS |
| Zeferino Murillo | US Department of Veterans Affairs, VR&E VetSuccess |
| Carrie Neckorcuk | The Financial Services Roundtable |
| Justin Nelson | National Gay & Lesbian Chamber of Commerce |
| Bryan Podzuis | The Financial Services Roundtable |
| Felicia Powers | National Gay & Lesbian Chamber of Commerce |
| Mike Reardon | DOL/ODEP |
| Melissa Reishus | Sea Glass Group |
| Paul L. Reynolds | Fifth Third Bancorp |
| Lynnae Ruttledge | US Department of Education, Office of Special Education and Rehabilitative Services (OSERS), Rehabilitation Services Administration (RSA) |
| Charlene Santis | SunTrust |
| Cassandra Shoffler | US Department of Education, Office of Special Education and Rehabilitative Services (OSERS), Rehabilitation Services Administration (RSA) |
| Mike Shriver | Bank of America Corporation |
| Tim Smith | Unum |
| Sue Swenson | US Department of Education, Office of Special Education and Rehabilitative Services (OSERS) |
| Brian Tate | The Financial Services Roundtable |
| Deborah Williams | TD Bank (TD Banknorth, Inc.) |
| Judy Young | Cornell University |
| Karen Zuckerberg | TD Bank (TD Banknorth, Inc.) |

Appendix B: Agenda

**DOL Financial Services Sector Summit:
“Profit by Investing in Workers with Disabilities”
Tuesday, July 19, 2011
The Financial Services Roundtable**

Agenda

8:00 – 9:00 AM

Registration and Continental Breakfast

9:00 – 9:30 AM

Welcome and Introductions

Steve Bartlett - President and CEO,
The Financial Services Roundtable (Roundtable)

John H. Dalton - President, Housing Policy Council

Seth D. Harris - Deputy Secretary,
U.S. Department of Labor

Kathleen Martinez - Assistant Secretary,
Office of Disability Employment Policy (ODEP),
U.S. Department of Labor

“I Can” PSA (video) by the Campaign for Disability
Employment, an innovative collaborative spearheaded by
ODEP

Participant introductions

9:30 – 10:15 AM

Collaborative Context:

Disability Inclusion across the Enterprise

Michael J. Eastman - Executive Director,
Labor Law Policy, U.S. Chamber of Commerce

Jill Houghton - Acting Executive Director,
U.S. Business Leadership Network

10:15 – 11:00 AM

Holistic Approach Can Benefit Business

Michael Shriver - Business Support Executive,
Global Corporate Social Responsibility Team,
Bank of America

| | |
|----------------------------------|---|
| 11:00 - 11:15 AM | Networking Break |
| 11:15 - 11:45 AM | Employer Current Practice in Recruitment, Retention, and Advancement of People with Disabilities |
| Topic: | Interactive session highlighting exemplary recruiting, retention and advancement current practices and initiatives to increase employment and career opportunities for people with disabilities. |
| Facilitator: | Susanne M. Bruyere, Ph.D. CRC - Associate Dean of Outreach & Professor of Disabilities Studies, Cornell University |
| 11:45 AM - 1:00 PM | Working Lunch: Keynote Speaker |
| | Ray Jefferson - Assistant Secretary, Veterans' Employment and Training Service (VETS), U.S. Department of Labor |
| 1:00 - 2:00 PM | New Disability - Inclusive Diversity Lens: Focus Beyond Race and Gender |
| Facilitator: | Justin Nelson - Co-Founder and President, National Gay & Lesbian Chamber of Commerce (NGLCC) |
| Participants: | Roundtable HR Working Group members and summit participants |
| Q&A - Open Discussion | |
| 2:00 - 2:15 PM | Networking Break |
| 2:15 - 3:15 PM | Return-to-Work; Return on Investment |
| Topic: | Roundtable Discussion on Disclosure, Accommodations, Productivity Tools, Employee Resource Groups, Back to Work |
| Presenters: | Maureen A. Griffin - Regional Vice President, Benefits Operations, Unum Neil Jacobson - former Senior Vice President, Systems Automation Management and Wireless Technology Divisions, Wells Fargo |
| 3:15 - 3:40 PM | Summary and Moving Forward: Co-Host Wrap Up: ePolicyWorks and White Paper |

Presenters:

Brian Tate - Vice President of Banking,
The Financial Services Roundtable

Mike Reardon - Policy Advisor, U.S. Department of Labor,
Office of Disability Employment Policy (ODEP)

3:40 - 3:45 PM

Closing Remarks and Announcement of 2011 National
Disability Employment Awareness Theme:
"Profit by Investing in Workers with Disabilities"

Kathleen Martinez - Assistant Secretary,
Office of Disability Employment Policy (ODEP),
U.S. Department of Labor

Steve Bartlett - President and CEO,
The Financial Services Roundtable

3:45 PM

Adjourn