

**EMPLOYER ENGAGEMENT STRATEGY  
Office of Disability Employment Policy  
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September 30, 2013 – September 29, 2014**

FINAL REPORT

February 2015

TABLE OF CONTENTS

EXECUTIVE SUMMARY ..... 3

INTRODUCTION ..... 6

BACKGROUND RESEARCH ..... 7

MARKETING FRAMEWORK ..... 11

BETA MARKETING PLAN ..... 13

METRICS ..... 21

CONCLUSION ..... 25

APPENDICES .....

## Executive Summary

Continuing its efforts to improve employment outcomes for workers with disabilities, the Department of Labor's Office of Disability Employment Policy (ODEP) contracted with Diversity Marketing and Communications to develop an Employer Engagement Strategy (EES) that provides an employer-focused marketing framework for addressing the dearth of employment opportunities for individuals with disabilities in the private sector.

EES is based on research conducted by Dr. Peter Cappelli, the George W. Taylor Professor of Management at the Wharton School of the University of Pennsylvania and Director of Wharton's Center for Human Resources, with his students. In focus groups with private-sector executives, Dr. Cappelli confirmed that ODEP's prior research on making an economic business case for increasing employment of individuals with disabilities was insufficient to persuade employers to increase their efforts at disability recruitment and retention. Dr. Cappelli and his students suggested developing a persuasive argument that addressed the underlying biases and cultural stereotypes toward those with disabilities. He reframed the challenge as a marketing case, and recommended using a strategic and tactical marketing framework, beginning with a segmentation of employers based on their readiness to support diversity and inclusion. His findings showed three distinct market segments in the private employer base which he characterized as the Choir, the Inclusives and the Uninitiated. The Wharton team identified two segments as particularly promising targets for ODEP's EES:

- Choir: Companies with existing programs and a culture that supports the hiring and advancement of people with disabilities.
- Inclusive: Companies that support a diverse workforce, but do not explicitly include people with disabilities in their initiatives.

The development of the EES began with a proof of concept to apply Dr. Cappelli's segmentation to actual companies. A group of companies was identified that fit the Choir and the Inclusive segments. Companies were assigned numerical scores based on their employment practices and policies (see Background Research/Proof of Concept). The scores incorporated two measures: one score to reflect commitment to the employment of people with disabilities and a second score based on workplace diversity and inclusiveness. Because the companies' actual employment numbers for individuals with disabilities were not available, affiliations and public initiatives, such as sponsorship of organizations such as the American Association of People with Disabilities (AAPD), were used as proxies for commitment to a diverse and inclusive workforce. Upon scoring the companies, it was confirmed that the Choir and Inclusive segmentation could be observed in practice.

Through collaboration with Dr. Deborah Small, Associate Professor of Marketing and Psychology, at the Wharton School, behavioral insights, such as those designed to make accessibility for employees with disabilities the norm rather than the exception, were incorporated into the marketing framework. These marketing strategies address intersections or “bottlenecks” in the employment cycle where prospects for people with disabilities are slowed or limited. Organizations with established diversity and inclusion initiatives—primarily the Inclusives—became the target audience. Interviews with companies in the Choir segment—employer members of the Circle—provided insights from their corporate journeys to establishing a set of best practices. (Circle refers to group of US businesses and organizations that received the Secretary of Labor’s New Freedom Initiative Awards (from 2002-2008) for innovative and proactive efforts to recruit, hire and promote people with disabilities.)

Four bottlenecks were identified as areas where employers need assistance to increase opportunities for people with disabilities:

1. Countering stereotypes
2. Self-identification for employees and applicants
3. Fulfillment of accommodations
4. Assembling basic information for increasing disability employment

Four strategies for opening the bottlenecks were identified:

1. Change perceptions and stereotypes
2. Educate and inform
3. Motivate with incentives
4. Apply nudges<sup>1</sup> to change the “status quo”

Three groups of tactics were identified as implementations for the above strategies, with a range of activities within each tactic:

1. Adjust Communications
  - a. Use visual communication, when appropriate, to signal cultural change
  - b. Incorporate disability language and images into all communication
  - c. Use the power of personal stories
  - d. Educate the staff about self-identification

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<sup>1</sup> “Nudge,” a term popularized by Dr. Richard Thaler of the University of Chicago and Cass Sunstein a Felix Frankfurter Professor of Law at Harvard Law School, refers to changes made to the environment to encourage desired outcomes among individuals.

2. Engage the Organization
  - a. Develop internal cross-functional resource groups
  - b. Use technology accessibility
  - c. Ensure that leaders participate in mentoring
  - d. Recognize and reward vendors that support advancement of people with disabilities
  - e. Identify new organizational designs and metrics
3. Create a Roadmap
  - a. Align information with the employment cycle
  - b. Link to downloadable resources
  - c. Distribute in an interactive format, such as an accessible web page

The Marketing Framework was introduced in a series of Roundtable events at four industry conferences and small group settings to obtain employer feedback (See Appendix/Findings from Roundtable Discussions).

The Marketing Framework also includes recommendations for how ODEP may use metrics to measure progress by employers as they move from Uninitiated through Inclusive to Choir status. Two methodologies are recommended: the Maturity Model and Randomized Control Trials. These methodologies can be used independently or in combination. The Maturity Model is being used by the US Business Leadership Network (USBLN) and the American Association of People with Disabilities (AAPD) for the Disability Equality Index (DEI). This benchmarking can be used by ODEP to measure adoption of strategies that are representative of Choir companies (e.g., how many companies have internship programs for people with disabilities and how the number changes over time). Randomized Controlled Trials, used by government task forces in the United States and the United Kingdom (known as “Nudge Units”), use insights from behavioral economics and human decision-making to advance the efficient implementation of public policy (Haynes, et. al., 2013). This methodology incorporates experimental methods to isolate variables and measure efficacy and causality (e.g., compare employment levels for people with disabilities among companies who offer internships and those that do not).

Recommendations for future actions include suggestions for education, policy, technical assistance and guidance. These approaches may be particularly helpful to assist small businesses with increasing employment opportunities for people with disabilities. ODEP may consider collaborating with the Small Business Administration (SBA) to develop resources to encourage companies below the Fortune 1000 level to apply the strategies identified in the EES Marketing Framework.

## INTRODUCTION

*Backcasting involves... A four-step thinking process for identifying how to improve a situation or setting. In the first step organization actors link identified symptoms to a root cause; in the second, they describe how an intervention, by overturning the root cause, can transform the symptoms into desired conditions; in the third, they specify the prerequisites that must be in place to implement the intervention; and in the fourth, they delineate the tactics to put these prerequisites into place.*

*Larry Hirschhorn, Backcasting: A Systematic Method for Creating a Picture of the Future and How to Get There, 2012*

The Department of Labor's Office of Disability Employment Policy (ODEP) contracted with Diversity Marketing and Communications to develop an Employer Engagement Strategy (EES) that provides a marketing framework for addressing the dearth of employment opportunities for individuals with disabilities in the private sector. Using research provided the Wharton School, Hirschhorn's "thinking-process" methodology, was followed to develop the EES.

To **link identified symptoms to a root cause**, critical intersections were identified that limit the employment process for people with disabilities and form virtual bottlenecks. **Interventions that overturn the root cause** were identified in the form of marketing strategies aimed at easing the bottlenecks. **Prerequisites to implement interventions** were built on the **segmentation framework** identified by subject matter experts at the Wharton School of the University of Pennsylvania. The **EES Marketing Framework** incorporates strategies and potential tactics that employers can implement to move steadily toward greater awareness of practices that support employment of individuals with disabilities.

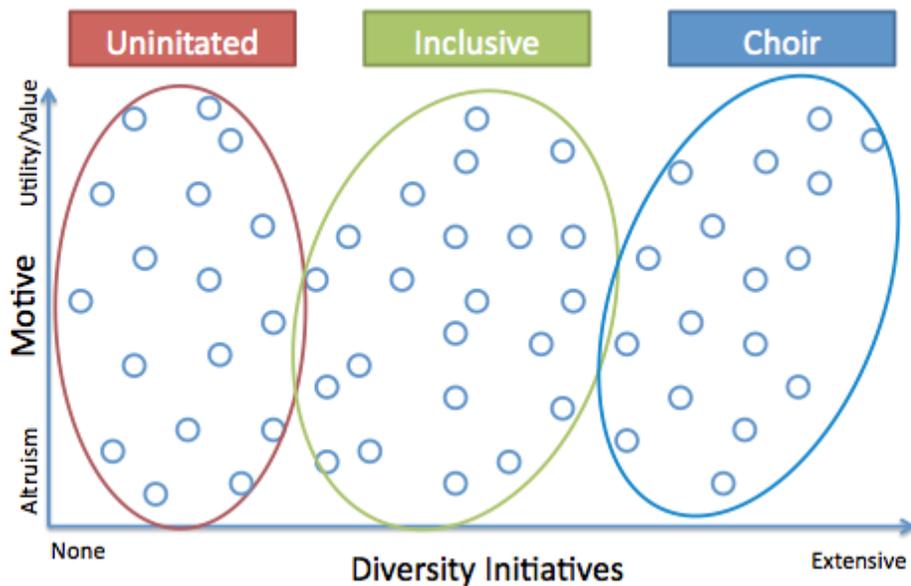
## BACKGROUND RESEARCH

### Where We Started: "RISE UP & SING"

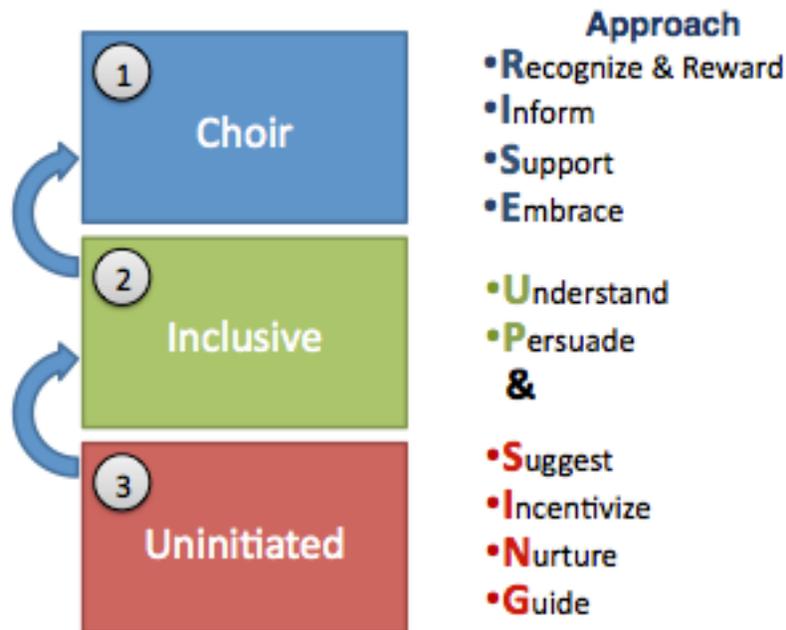
The EES initiative was based on research led by Dr. Peter Cappelli, the George W. Taylor Professor of Management at The Wharton School of the University of Pennsylvania and Director of Wharton's Center for Human Resources, with his students.

In focus groups with private-sector executives, Dr. Cappelli validated previous research by ODEP that making an economic business case for the increased employment of individuals with disabilities was insufficient to persuade employers to increase their efforts to do such. Dr. Cappelli advised that addressing the underlying biases and cultural stereotypes toward those with disabilities would be more effective. He reframed the challenge as a marketing case, and recommended that ODEP apply the types of marketing strategies and tactics used by employers to promote their products and services.

Dr. Cappelli began by segmenting employers based on their readiness to support diversity and inclusion. His findings identified three distinct segments as shown below:



Dr. Cappelli’s segmentation framework is fluid and suggests that employers can move along the continuum from Uninitiated to Choir. He suggested that ODEP brand the strategy that encouraged movement with the acronym “RISE UP & SING”:



The Wharton team characterized two segments as particularly promising targets for an Employer Engagement Strategy (EES):

- **Choir:** Companies with existing programs and cultures that support the hiring and advancement of people with disabilities.
- **Inclusive:** Companies that support a diverse workforce, but do not explicitly include people with disabilities in their initiatives.

Dr. Cappelli encouraged ODEP to make the “Business Case” with principles of behavioral economics and to develop customized approaches for each segment to “expand the Choir.” ODEP engaged Diversity Marketing and Communications to develop an EES to encourage continuous improvement in workplace opportunities for people with disabilities.

## **Proof of Concept**

Development of the EES began with a proof of concept to apply Dr. Cappelli's segmentation to actual employers. Companies were identified that fit the characteristics of the target Choir and Inclusive segments. Numerical scores were assigned based on affiliations and public initiatives as proxies for commitment to a diverse and inclusive workforce.

Upon scoring the companies, it was confirmed that the segmentation of Choir and Inclusive companies could be observed in practice. The methodology yielded a total of 161 companies segmented into 79 "Choir" companies and 82 "Inclusive" companies

The methodology involved three phases:

### **Phase 1: Scoring**

Numerical scores were assigned to companies based on their employment practices and policies. The scores incorporated two measures: one score to reflect commitment to employment of people of disabilities and a second score based on workplace diversity and inclusiveness.

A "Disability Score," affiliation with organizations that are members of ODEP's Campaign for Disability Employment (CDE), was used as a proxy for commitment to a diverse workforce. CDE members include the American Association of People with Disabilities (AAPD), National Business and Diversity Council (NBDC), National Gay & Lesbian Chamber of Commerce (NGLCC), Special Olympics, Society of Human Resource Management (SHRM), the Job Accommodation Network (JAN), and US Business Leadership Network (USBLN). Companies received a score of "1" for each organization with which they are affiliated. (To illustrate, AT&T is associated with four CDE member organizations, and therefore received a score of "4".)

For the “Diversity Score,” two proxies were used to gauge commitment:

- DiversityInc Top 50: Now in its 14<sup>th</sup> year, the employer survey conducted by DiversityInc.com includes nearly 1,000 businesses. Companies that ranked in the top 50 on the 2013 list earned a score of “0.5” (example: JC Penney).
- *Amicus curiae* brief filed in the 2012 Supreme Court case of *Fisher v. University of Texas at Austin*: Diversity analyzed the list of companies that joined the “friend of the court” brief in support of affirmative action. The majority of the 65 companies had supported a similar case in 2003, in which they stated, “[The friends of the court] have found through practical experience that a workforce trained in a diverse environment is critical to their business success...” Companies that joined the brief earned a score of “0.50” (example: Boeing).
- Companies represented in the DiversityInc Top 50 and the *amicus curiae* brief earned a score of “0.75” (example: Dell).

### **Phase 2: Ranking**

Companies were ranked from highest combined Disability and Diversity scores to lowest. Diversity scores for companies that recognize the LGBT (lesbian, gay, bisexual, or transgender) community in their inclusion initiatives were weighted higher.

- Based on the Wharton team’s research, commitment to an LGBT-friendly workplace demonstrates that the company is committing resources and education to promote a culture of inclusion and diversity. This type of commitment may indicate companies that can be encouraged to move from “Inclusive” to “Choir” status for employment of people with disabilities.
- Affiliation with the National Gay & Lesbian Chamber of Commerce (NGLCC) was used as a proxy for LGBT support.

### **Phase 3: Segmentation**

- Companies earning a total score of 1.5 or higher were assigned the Wharton designation of “Choir,” as they demonstrated support for employment of people with disabilities as well as diverse and inclusive workforces.
- Companies scoring below 1.5 were assigned the Wharton designation of “Inclusive.”

## MARKETING FRAMEWORK

To develop the Employer Engagement Strategy, Diversity Marketing and Communications collaborated with Dr. Cappelli and his Wharton School colleague Dr. Deborah Small, Associate Professor of Marketing and Psychology.

A Marketing Framework was established that suggests incorporating targeted messages and behavioral insights to address intersections or “bottlenecks within the employment cycle may inhibit opportunities for people with disabilities. Organizations with established diversity and inclusion initiatives—the Choir and Inclusive segments—served as the target, pilot audiences. To understand current best practices, interviews were conducted with companies that meet the criteria for the Choir segment. (See Appendices/Interviews with Circle Companies for transcripts of interviews.)

Flexibility was built into the Marketing Framework to support the goal of continuous improvement and to reflect that employment is a continuous matching process between employers and employees that continues beyond the initial hire to ensure the employee’s continued success and contributions to the workplace.

### Bottlenecks in the Employment Process

Dr. Cappelli’s focus groups revealed five key bottlenecks that limit employment opportunities across all segments for people with disabilities:

1. **Cultural Stereotypes:** Perceptions exist that people with disabilities are less qualified, or that they are suffering from their disabilities, which creates discomfort among employers.
2. **Self-Identification:** Potential or current employees are reluctant to self-identify; however, as federal contractors need this information for compliance with Department of Labor (DOL) regulations.
3. **Accessing Information:** Employers are overwhelmed by the amount of information available, but simultaneously need more information, particularly federal contractors who are affected by the new DOL regulations in Section 503 of the Rehabilitation Act.
4. **Need for Incentives:** Employers need greater visible acknowledgement for their efforts to employ more individuals with disabilities, to encourage continued buy-in and investment in disability and inclusion efforts.
5. **Accommodation Process:** Employers and employees need ongoing guidance in providing and requesting accommodations, respectively. As Dr. Cappelli noted, “Application of strategies to ease bottlenecks will vary based on

employer size and relative position within the Choir, Inclusive, or Uninitiated segments.”

Dr. Small recommended strategies to ease the bottlenecks:

1. **Change perceptions and stereotypes:** As Dr. Cappelli identified, building a rational, economic business case does not address inherent bias, and those biases influence perceptions. Choir companies have addressed this bottleneck through programs and awareness-raising activities that work to change these perceptions.
2. **Educate and inform:** The distribution of information and education to HR executives and hiring managers is closely linked to the process of changing perceptions and creates awareness of a set of practices for increasing disability employment.
3. **Motivate with incentives:** Choir companies must be recognized and rewarded for their progress, including individual employees at all levels who will also respond through the use of incentives.
4. **Change the status quo through “Nudges”:** Principles of behavioral economics and human decision-making were identified that can help open bottlenecks. As Dr. Small explained,

*All behavior is a function of the person and the situation, and so to change behavior, you must change the person or change the situation. Situational influences are stronger than personal influences. When we change perceptions and stereotypes, we change attitudes. When we educate and inform, we change knowledge. When we use incentives, we are changing motivation. Each of those three is a change to the person. Only a nudge is a change to the situation.*

“Nudge,” a term popularized by Dr. Richard Thaler of the University of Chicago and Cass Sunstein a Felix Frankfurter Professor of Law at Harvard Law School, refers to actions that are taken on the environment rather than directed at individuals. Because people draw behavioral prompts from their environment, nudges provide an additional method for influencing desired behavior (Thaler, et al., 2008).

5. Employers are experimenting with universal organizational designs that provide new approaches to accommodating employees.

## BETA MARKETING PLAN

Findings from the focus groups suggest that bottlenecks exist in all phases of the employment cycle—from recruiting and hiring to retention and advancement. The pervasiveness of cultural stereotypes, in particular, informed the development of the tactical approach of the EES Marketing Plan. Three categories of tactics are recommended to ease the bottlenecks to increase employment opportunities for people with disabilities. The tactics, with a range of specific actions, are outlined below:

### 1. Communications

- a. Use visual communication, when appropriate, to signal cultural change
- b. Incorporate disability language and images into all communication
- c. Use the power of personal stories
- d. Educate the staff about self-identification

### 2. Engagement

- a. Develop internal cross-functional resource groups
- b. Use technology to promote accessibility
- c. Ensure that leaders participate in mentoring
- d. Recognize and reward vendors that support advancement of people with disabilities
- e. Identify new organizational designs and metrics

### 3. Roadmap for Information

- a. Align information with the “employment cycle”—from recruiting and hiring through resignation/termination or retirement
- b. Link to downloadable resources
- c. Distribute in an interactive, accessible format

Recommendations and suggestions for implementing each tactic are presented below.

***Use Visual Communication to Signal Cultural Change:*** Visual communication is one of the most powerful marketing tactics available. Employers can signal a shift in corporate culture by incorporating visual imagery of disability inclusion into all communications, even where disability is not the focus. This tactic represents a nudge: an altering of the default visual landscape that sensitizes the audience to the company’s commitment to accessibility and inclusion.

One method, for example, of employing visual imagery is to use standard disability graphics symbols (e.g., International Symbol of Accessibility (ISA), closed caption symbol) on all internal and external communications, including customer-facing and supplier-facing communications, forms, and web pages. For example, a photo of a company’s corporate campus in an annual report might contain the accessibility symbol in the corner of the photo, even when accessibility is not the focus. Such a

shift in the environment helps to make disability information an expected element in a company's communication.

Some Choir companies have developed a new mark or sub-brand that represents the company's commitment to diversity and inclusion. Examples include Manpower's Access2Ability brand, and Prudential's "I Bring..." campaign.

Companies are encouraged to create best practices for use of imagery of people with disabilities to avoid reinforcing prevailing stereotypes. Suggestions include employees working and performing job tasks; in a mixed group with employees without disabilities, and not isolated; and in realistic, candid settings. Pictures of adaptive equipment should be items that are appropriate for the employment setting. Companies can create libraries that facilitate resources for successful design via PowerPoint templates, assembling a rights-free image bank or a shared workspace where design teams can post examples of best practices from other companies and the broader culture. Corporate marketing and communications departments can conduct annual webinars with internal design teams and independent designers to train them on best practices, web access standards, and company standards, as well as showcase their work to other departments within the company.

***Incorporate Disability Vocabulary into all Communication:*** Embedding disability employment goals in communication to all internal and external stakeholders is a powerful means to shift culture and signal company priorities. Organizational language practices should also adhere to contemporary tenets that ensure consistency and best practice.

Companies can consider evolving their hierarchical "codes of conduct" into a people-first language governance document, working with their legal departments to ensure that mandatory requirements are met while adapting the necessary language to a human-centered approach. This practice mirrors the evolving philosophy in corporate communications. ODEP's website and its partners can provide access to resources that provide guidance regarding protocol and vocabulary.

Diversity and inclusion language can be included in the same governance communication as ethics, compliance and harassment language, thereby elevating it to the same level of importance. Internal websites or intranets can contain a section on inclusion, where guides/FAQs/policies are posted which anticipate varying situations that might arise in a diverse workplace, including etiquette documents for interacting with people with disabilities, policies on requesting adjustments/accommodations and policies on dispute resolution. Statements of the company's mission can include how an inclusive business model fits the organization's business goals.

Diverse hiring statements, internal and external, should be updated to include disability, such as this statement, which is currently in practice: “[Company Name] is committed to diversity in its workforce. [Company Name] is an equal opportunity employer and ensures the promotion of equal opportunity for all persons employed or seeking employment, without regard to race, sexual orientation, color, creed, national origin, sex, age, or disability status.” Employee Value Propositions (EVP), which describe what organizations want and expect from employees and what is provided in return, can also incorporate diversity and inclusion goals. HR consultancy Towers Watson views the EVP as an effective means to drive employee engagement. Findings from the firm’s 2013-14 “Change and Communication ROI” study reveal that the way companies handle employee communication is fundamentally changing. Organizations with both highly effective communication and change management practices are more than twice as likely to significantly outperform their peers. A strategically designed EVP can help attract, retain, motivate and engage employees to drive business success. Towers Watson’s report recommends, “The extent to which employees connect with the organization’s EVP determines the amount of discretionary effort they commit to bringing the company culture, mission, vision and values to life.”

***Use the Power of Personal Stories:*** Personal stories, which use positive exemplars of people with disabilities, add further engagement to the communication tactics described above, lifting awareness of the company’s commitment to diversity and inclusion. Personal examples also work at an emotional level, to help shift pervasive biases or misconceptions about people with disabilities. While stories of individuals with disabilities are often at the center of a personal approach, there are a variety of additional ways to utilize this tactic.

Companies are encouraged to share their journey in developing a commitment to disability employment. Often there is a passionate executive or other individual with a personal connection to people with disabilities who has inspired the organization. Incorporating brand storytelling techniques into the communication of personal stories can further the emotional resonance. As contrasted with traditional brand communication, where the benefits of a product (the “what”) precede the reasons the consumer should purchase it (the “why”), brand storytelling reverses the information, placing the “why” before the “what.” The result is a unique messaging strategy that builds affinity with the audience from the outset.

***Educate Staff about Self-Identification:*** To facilitate self-identification and ensure that employees get the proper information about the rationale for self-identification, it is recommended that education be built into existing employee training. In large companies, this effort could parallel the existing ethics and compliance training.

The elements of the program could include the creation of a 3-5-minute video or slide show that explains the Section 503 regulations, including the purpose of the

self-identification form and what happens to the information after it is collected. The presentation would also promote the company's commitment to a diverse, inclusive workforce and provide a contact for employees or managers who have questions.

Integration of the above learning module into the new employee onboarding process can ensure that all new employees have been exposed to the information. Companies may also find that creation of separate, more detailed training for HR professionals and hiring managers at the point of job specification can aid in distributing awareness of the regulations.

***Develop Cross-Functional Resource Groups:*** Trends in fostering innovation and universal design have led some companies to refashion Employee Resource Groups (ERGs) into Business Resource Groups (BRGs). While ERGs usually are focused on the needs of the employees, BRGs are aligned with the mission, vision and values of the employer. BRGs are typically cross-functional by department, seniority, geography and affinity. Variations and hybrids are also being utilized, so that even more traditional ERGs are aligned with the goals of the organization.

Some companies empower BRGs to be standard bearers for cultural-change initiatives. For example, at Merck, the Victory Over Impairment and Challenge Enterprise BRG has been a catalyst for cultural change, helping reveal workplace challenges for employees with disabilities and drive swift solutions. Internal mentoring programs are sometimes an extension of the BRG's work. At EY (formerly Ernst and Young), all employees are assigned a counselor, who serves as a coach and advocate for career growth. Counselor is a long-term assignment and by definition, one staff level above the counseled employee and in a similar area of the business, but may not be a direct supervisor.

Successful BRGs are supported at the executive level. Dow Chemical uses the term Network for an ERG, and each Network has an Executive Sponsor. Executive Sponsors are direct reports to the CEO and provide guidance, assist with scheduling of events, getting funding, etc.

***Use Technology to Increase Accessibility:*** Increased use of technological innovation can benefit employees with disabilities in profound ways. Given the wide variety of resources among private employers, the Employer Engagement Strategy focuses on providing information to raise awareness of the ways in which technology can benefit employees with disabilities, including:

- **Flexible Workplace:** Technological tools to enable virtual workplaces and telecommuting.
- **Hiring and Talent Management Technologies:** A more anonymous hiring and performance management process can create fairer and better conditions for all employees, not just employees with disabilities. Electronic recruiting tools can yield benefits, if they are used fairly and without bias and are fully accessible. Talent management tools can be a significant source of employment metrics.
- **508 Compliance and Customer Outreach:** Companies can demonstrate their support of people with disabilities by raising the accessibility of their customer-facing materials. This can include programs that bring connectivity to underserved populations.
- **Training:** Companies such as Microsoft, IBM, and Qualcomm are developing innovative tools and training for IT managers to teach new solutions and provide business cases for adopting new technology and evolving standards.

***Ensure that Business Leaders Participate in Mentoring:*** Establishing a formal business leaders' mentoring program will not only serve the goal of disseminating best practices in the employment of individuals with disabilities, it also can recognize and reward companies and the inspiring executives who create change. Using mentoring to move companies up through the RISE UP & SING framework is a key goal of the Employer Engagement Strategy. A blog to which mentoring employees contribute could supplement the program. Corporate PR channels and partnerships can raise awareness of the mentoring program and attract more participants. A formal recognition program, either internally or externally focused, can also be added.

***Recognize and Reward Vendors that Support Employment of People with Disabilities:*** Employers that wish to support employment of people with disabilities can extend those efforts from their own employees to their supply chain. Patronizing suppliers that are disability-owned businesses is an important first step. The USBLN Disability Supplier Diversity Program serves as a third-party certification program for disability-owned businesses. Sharing personal stories can also be expanded to the supply chain. Expanding suppliers' relationships beyond the procurement department can make them, and their efforts, part of the extended company culture.

## Identify New Organizational Designs and Metrics

Ultimately, corporate change—both cultural and practical—that advances increased employment opportunities for individuals with disabilities will rely on new organizational design that embeds disability and diversity initiatives into the larger organization. Management expert Larry Hirschhorn warns that pilot programs cannot simply produce small wins, because people will retreat when the harder work has to be done. Innovative organizational design needs to “be able to loop learning back into the rest of the organization” (Hirschhorn 2002).

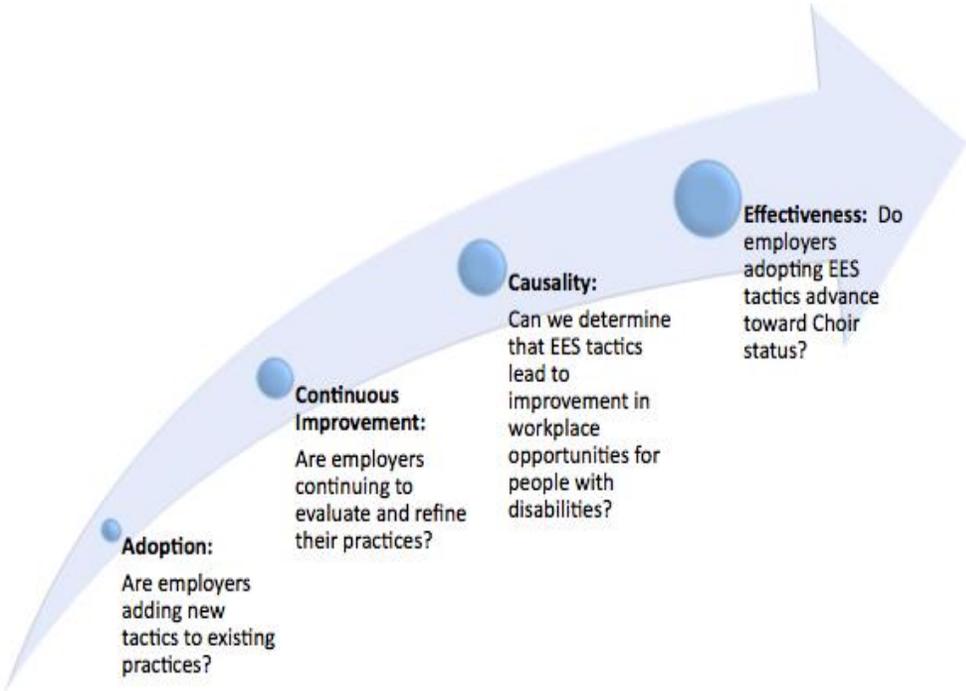
In some organizations, “universal design” appears to influence the approach to accommodations. At EY, for example, “accommodations” are referred to as “adjustments.” This approach is based on the assumption that all employees may need modifications to their workspace and/or schedule to be productive and communicates an important shift in corporate culture. Similarly, individualized approaches to skills training and talent management are being used across many candidate pools. OfficeMax uses this approach for new candidates with disabilities, offering training in an individualized environment, at their own pace, where they can experience distribution, logistics, retail and office supply to help determine the appropriate career path. In addition, some Circle companies are centralizing the accommodations function to remove cost and decision-making responsibilities from hiring and business unit managers (see Appendices/Interviews with Circle Companies).

Companies are actively searching for metrics to measure their progress toward employment of people with disabilities. Among the tactics being utilized are employee surveys, hiring technologies, and marketing metrics. Section 503 regulations are also expected to provide data streams that measure utilization goals.

***Align Information with the Employment Cycle:*** Participants in Dr. Cappelli’s focus groups said they wanted to take steps to increase employment of people with disabilities, but felt overwhelmed by the amount of information available through public, private and government sources. ODEP can increase utilization and awareness by organizing available information to align with the Choir, Inclusive, and Uninitiated segmentation. Presenting information in modular form with a roadmap orientation will allow the disability employment process to be seen end-to-end, which is helpful for managers who may not know where to begin, or where to go next. Checklists and other downloadable information can be linked to specific actions on the roadmap, such as how to more effectively recruit and interview candidates with disabilities. Checklists are available from the [USBLN](#) and the [Conference Board](#).

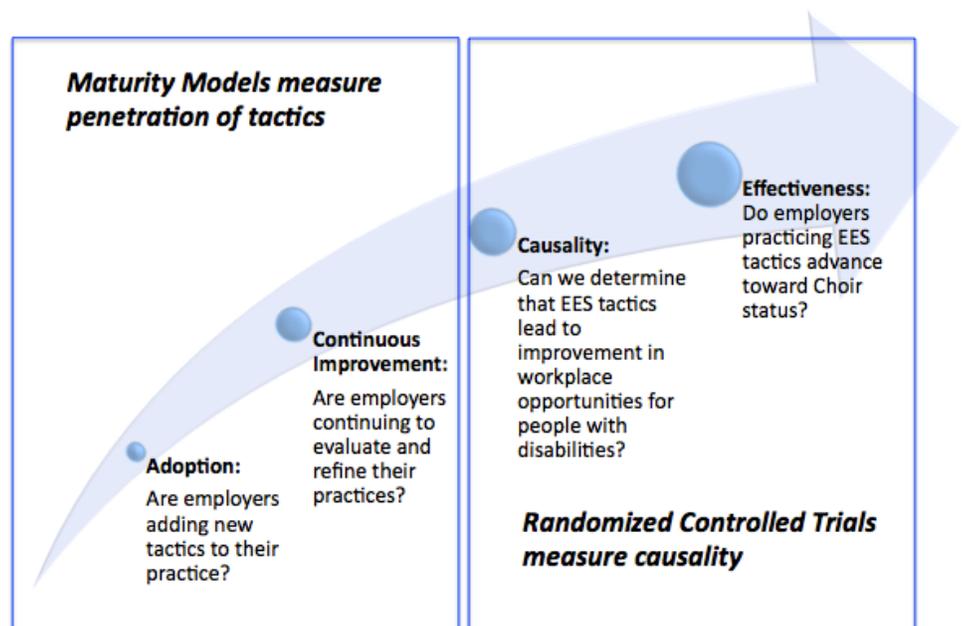
**METRICS**

Effectiveness of the EES marketing framework can be evaluated by looking at the progress made by employers and ultimately, how they advance from the Uninitiated segment to the Inclusive to Choir status:



## Two Research Approaches

Maturity Models and Randomized Controlled Trials can be used to gauge employers' movement from segment to segment. The models can be used together or separately. The methodology will be determined by the measurement objective. As Dr. Cappelli noted, "Metrics can both measure change and cause change."



**Maturity Model:** Maturity Models allow organizations to assess methods and processes against a clear set of external benchmarks, with the goal of attaining a certain target or "Maturity." The HRC Corporate Equality Index, DiversityInc50 and the USBLN/AAPD Disability Equality Index are examples of Maturity Models. The Maturity Model is based on the traditional approach to benchmarking, which includes the following steps:

- Identify what is to be benchmarked
- Identify comparative companies
- Determine data collection method and collect data
- Determine current performance "gap"
- Project future performance levels
- Communicate benchmark findings and gain acceptance
- Establish functional goals
- Develop action plans
- Implement specific actions and monitor progress

- Recalibrate benchmarks

The Maturity Model can be used to measure *penetration* of tactics included in the EES. These tactics collectively represent the benchmarks for the performance of Choir companies. Some examples include:

- Development and use of internal training programs
- Use of visuals in company materials that support disability employment practices
- Use of people-first and other inclusive vocabulary in all communications, including a disability hiring statement
- Use of mentoring programs
- Use of internship programs
- Use of supplier recognition programs

**Randomized Controlled Trials:** Policy units in the United States and United Kingdom incorporating “nudges” are using controlled experiments that isolate the variables contributing to potential change. Subject matter experts from the UK’s Cabinet Office categorize Randomized Controlled Trials are using a scientific method of TEST-LEARN-ADAPT (Haynes, et al. 2013) as shown below:

<b>TEST</b>	Identify two or more policy interventions to compare (e.g., old vs. new policy; different variations of a policy)
	Determine the outcome that the policy is intended to influence and how it will be measured in the trial
	Decide on the randomization unit: whether to randomize intervention and control groups at the level of individuals, institutions (e.g., employers), or geographical areas
	Determine how many units (people, institutions, or areas) are required for robust results
	Assign each unit to one of the policy interventions, using a robust randomization method
	Introduce the policy interventions to the assigned groups
<b>LEARN</b>	Measure the results and determine the impact of the policy interventions
<b>ADAPT</b>	Adapt policy intervention to reflect the findings
	Return to Step 1 to continually improve upon the data set and analysis

Randomized controlled trials can be used to measure EES recommendations for cultural and organizational change and identify causal relationships. ODEP or designated agencies can design experiments to measure the impact of certain tactics on the bottlenecks or moving employers through the RISE UP & SING framework: Some examples include:

- Does creating a roadmap for employment of people with disabilities affect perceptions of individuals with disabilities? Are perceptions different in HR than among business units? Do perceptions change when the roadmap is combined with internal educational sessions?
- What is the impact of including images of people with disabilities in communications materials? Does it lead to more candidates with disabilities? Higher rates of self-identification?
- How does featuring the process for requesting accommodations on external career/job application materials impact requests for accommodations from existing employees?
- Does instituting the requirement that all presentations be in accessible formats impact perceptions of employment of people with disabilities? Do perceptions change when a statement is provided to explain the reason for the requirement?
- Does sponsoring an internship program for people with disabilities lead to greater employment opportunities?

## **CONCLUSION**

The Employer Engagement Strategy is based on original research conducted on ODEP's behalf by Dr. Peter Cappelli of the Wharton School of the University of Pennsylvania. Using theories of behavioral insights contributed by Dr. Deborah Small, Associate Professor of Marketing and Psychology at Wharton, the Employer Engagement Strategy is positioned to support employers through a process of continuous improvement to enhance workplace opportunities for individuals with disabilities.

This report documents the validation of the segmentation strategy proposed by Dr. Cappelli and development of the marketing framework. Detailed tactics are provided for each of the main strategies to address bottlenecks that affect the recruiting, hiring, and advancement of people with disabilities. The report also examines methodologies that ODEP can use to evaluate the effectiveness of the marketing framework.

Policy, education, technical assistance and training initiatives will be informed by these strategies. Policy will be particularly important as employers begin to implement the regulations required under Section 503 of the Rehabilitation Act of 1973 and incorporate provisions of the recently passed Workforce Innovation and Opportunity Act (WIOA). Education initiatives can be used to inform professionals involved in recruiting as well as diversity and inclusion about strategies and tactics that can expand their talent pools to include more individuals with disabilities. Selecting "beta test sites" to pilot the Employer Engagement Strategy's marketing framework can educate employers about communications, organizational design, and leadership development tactics that can enhance opportunities for people with disabilities.