



**Engaging Employees
to Measure Success:
Innovative Approaches to
Encouraging Self-Identification
of Disability**

The Employer Assistance and Resource Network on Disability Inclusion (EARN) is a resource for employers seeking to recruit, hire, retain and advance qualified employees with disabilities. It is funded by the U.S. Department of Labor's Office of Disability Employment Policy under a cooperative agreement with Cornell University. For more information, visit [AskEARN.org](https://www.assume.org). Preparation of this item was fully funded by the United States Department of Labor, Office of Disability Employment Policy in the amount of \$8,000,000 (four-year total grant amount) under Cooperative Agreement No. OD-33975-19-75-4-36. This document does not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial products or organizations imply endorsement by the U.S. Government.

Today, more and more employers across the U.S. are recognizing the value of a workforce inclusive of people with disabilities and using a variety of innovative strategies to bring them on board. Reflecting the adage “what gets measured gets done,” some are voluntarily taking proactive steps to recruit and retain qualified people with disabilities and track progress toward specified goals. Moreover, some companies are required to do so. Specifically, under Section 503 of the Rehabilitation Act, federal contractors must have affirmative action programs for people with disabilities that include hiring goals, workforce analyses, barrier analyses, proactive steps and progress reports. In either case, whether a program is voluntary or required, the primary method for measuring success and identifying opportunities for improvement is to invite applicants and employees to self-identify as having a disability.

While the resulting data (whether collected for voluntary or required affirmative action purposes) helps assess progress toward disability inclusion goals, it is important that companies understand the value of self-identification in a broader context. Self-identification should not be solely about compliance or achieving certain numbers or percentages.

Rather, the very act of inviting applicants and employees to self-identify can help convey a company’s commitment to a workforce inclusive of diverse perspectives and skills. In short, a strong self-identification program can encourage employees to bring their “whole selves” to work and thus is an essential component of a workplace that is truly inclusive.

In 2019, the National Industry Liaison Group (NILG) surveyed its membership, which comprises federal contractors, on self-identification practices. This survey revealed that 43 percent conduct a self-identification survey of employees every five years (the timeline dictated by the 2014 updates to Section 503), while 23 percent do so annually. It also revealed that most companies see only 1-2 percent of their workforce identifying as a person with a disability, and that only a third have seen an increase in this rate since implementing the 2014 updates. These findings demonstrate that work remains to improve self-identification and to respond to ongoing requests from ILG constituents for assistance educating employees about the benefits it offers to both individuals and organizations.

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In this spirit, NILG and the Employer Assistance and Resource Network on Disability Inclusion (EARN) developed this guide, which outlines strategies to address what research¹ by Cornell University's Yang-Tan Institute on Employment and Disability has shown to be the main barriers to self-identification, among them:

- Risk of being fired or not hired or promoted;
- Risk of being treated or viewed differently by colleagues and supervisors;
- Desire for privacy;
- Risk of losing healthcare benefits; and
- Knowledge that the disability has no impact on job performance.

In addition, this guide includes examples of innovative approaches some businesses have taken to increase self-identification rates among their employees, as well as ways companies can track progress as they strive for continuous improvement.

ENSURING OPPORTUNITIES FOR ALL

Ensuring opportunity for all is the foundation for success of any self-identification program—and business. It is important to proactively assure individuals that self-identifying as having a disability will not negatively impact their opportunities with the organization, because many mistakenly believe it might. In the Cornell research, 73 percent of survey respondents with disabilities reported being afraid that disability self-identification would cause them to not be hired or to be fired. In addition, 61.1 percent reported that the risk of limited future opportunities was a very important factor in deciding not to self-identify as having a disability.

Eli Lilly and Company's formal statements of commitment had a big impact on one employee's decision to self-identify. Speaking at an event sponsored by the National Organization on Disability, Dr. Andrea Sassman-Kolesaric said, "Coming from a small country and living through a war, having opportunities I didn't expect to have, I have a complete absence of entitlement and don't take things for granted. Before I decided to disclose my mental disabilities, I thoroughly looked through Eli Lilly and Company's handbook and values. And it was clear that, with everything Lilly stands for, there was no way I'd be punished for my disclosure."

THE MEANING OF THE TERM "SELF-IDENTIFICATION"

For purpose of this resource, the term "self-identification" means voluntarily and confidentially providing information about disability status that is used for statistical purposes only (i.e., data collection and reporting purposes). It is not the same as "self-disclosure" (or just "disclosure"). Rather, "self-disclosure" means sharing information about one's disability in any context other than through a formal self-identification program.

This may include self-disclosing to specific personnel to personally benefit oneself, for instance, presenting documentation in order to obtain a reasonable accommodation or participate in a targeted program that takes disability into account among selection factors. It may also include self-disclosing to simply help create a welcoming environment for others, such as during a presentation.

¹ von Schrader, S. Malzer, V., Erickson, W., & Bruyère, S. (2011). Emerging Employment Issues for People with Disabilities: Disability Disclosure, Leave as a Reasonable Accommodation, Use of Job Applicant Screeners; and von Schrader, S., & Bruyère, S. M. (2018). Survey report: What works? How federal contractors are implementing Section 503. Ithaca, NY: Yang-Tan Institute on Employment and Disability.

What can your business do to help employees understand the benefits of self-identification and feel reassured that providing this information will not impact their career development?

Strategies

- Communicate your commitment to employees and the public
 - Include disability in the company's diversity mission statement.
 - Explain how data collected is used to improve the representation of people with disabilities in the company.
 - Extend recruitment efforts to specifically target jobseekers with disabilities.
 - Establish and communicate fair systems and procedures.
 - Include disability in broader diversity and inclusion initiatives.
- Help your employees build success
 - Implement professional development programs for employees with disabilities.
 - Encourage employees with disabilities to engage in career development initiatives, including detail assignments, coaching, individual development plans and mentoring opportunities.
 - Create accessible workplaces, spaces, processes and opportunities.
 - Share successes of employees with disabilities. Make disability ordinary by highlighting stories of employees with disabilities or creating videos in which company leaders self-identify.
 - Maintain a centralized reasonable accommodation fund at the highest level in the company to remove the administrative and financial responsibility of reasonable accommodation from the direct manager or supervisor.

PwC shares successes of employees with disabilities through its "Ability Reveals Itself" initiative. This initiative was conceived and launched by PwC's Office of Diversity and members of the firm's leadership team. Through it, the company showcases the value and talent people with disabilities add across its organization through photo and video profiles on its website and various internal activities. The purpose of the initiative is, according to the organization, "to improve accessibility, recruit campus and experienced hires, develop learning resources, as well as raise awareness that our caregivers and professionals with disabilities are valuable contributors to the growth of our firm." As part of the initiative, it has also published the *Ability Reveals Itself Disability Inclusion Impact Report* detailing its disability-inclusion efforts across the U.S.

CREATING A WELCOMING ENVIRONMENT

Creating a welcoming environment, one where individuals feel comfortable bringing their "whole selves" to work and supported by peers and management alike, is also vital to the success of any self-identification effort. In fact, according to the research conducted by Cornell, 62 percent of survey respondents with disabilities expressed concern that, if they were to self-identify, their employer might then focus on their disability instead of their ability. A majority also reported concern that:

- Their supervisors might not be supportive (60.1 percent);
- They would be treated differently (57.8 percent); and
- They would be viewed differently at work after self-identifying (53.8 percent).

What can your business do to proactively create an environment that accepts all employees and is supportive of individual differences?

Strategies

- Foster supportive staff-supervisor relationships. This can be accomplished by creating structured opportunities for staff and supervisors to meet, develop shared work goals and accountability systems, and establish a communication loop allowing employees to easily ask for support and feedback.
- Conduct disability awareness and diversity training for all employees. For resources to help you develop trainings for your workplace, check out EARN's *Training Center for Disability Employment and Inclusion* at AskEARN.org/training-center.
- Make websites (internal and external) accessible and design websites and marketing materials to convey a commitment to disability inclusion through inclusive imagery and language. This includes highlighting policies regarding reasonable accommodations and opportunities for internships and mentorships.
- Avoid focusing solely on disability or holding employees with disabilities to different (either higher or lower) standards. This is accomplished by ensuring that all personnel actions are administered without regard to disability and all employment decisions are based solely on valid job requirements.
- Seek input through employee surveys, focus groups, and employee resource groups (ERGs) or affinity groups regarding the existence of an accessible and disability-inclusive workplace environment.
- Gain senior leadership buy-in and sponsorship of disability-related initiatives. Senior leadership should emphasize how work groups that include diverse perspectives and people, including those with disabilities, are known to yield greater engagement, productivity and performance.

Through its internally focused “You Belong Here” video and associated campaign, multinational food, snack and beverage corporation **PepsiCo** educates about the importance of self-ID to helping it understand how well it is serving its associates with disabilities. In addition to highlighting the contributions of a diverse array of employees with disabilities, the video emphasizes that the term disability encompasses a wide range of conditions, the majority of which are not visible. Moreover, PepsiCo’s chairman and CEO states that associates with disabilities “make us a faster, stronger, better company” and urges them to self-ID so that the company can “continue doing everything we can to support you and encourage more people with disabilities to join the PepsiCo team.” Watch the video at AskEARN.org/resources/employer-success-stories/pepsico.

When **Merck** launched a self-ID campaign in 2014, it found that a holistic approach, one that incorporated disability into a larger effort focused on multiple diversity factors, led to positive results. To support its efforts, the company conducted video interviews with members of the company’s ERGs, including its disability-related ERG. These interviews, which included statements from the executive sponsor of the self-ID campaign, were then embedded in email communications to employees. The message was one not of “check the box” but rather the importance of “bringing your whole self to work.” Merck also created a separate section of its intranet dedicated to self-ID, through its diversity and inclusion page. This section includes all related information, including why the company collects diversity data, how it keeps data confidential, and the fact that, for purposes of disability, employees do not need to specify a particular condition. It also includes information about reasonable accommodation processes and disability etiquette. Once launched, Merck made the decision to do a proactive push every year, not every five years as required under federal contractor regulations. Moreover, it leaves the portal open so that an employee can choose to update their status at any time. To gauge the success of its campaign, Merck tracks participation (meaning employees who go into the system) and has found that, when employees do participate, there is a 200 percent increase in self-ID rates.

SUPPORTING HEALTH AND WELLNESS

For many people both with and without disabilities, health insurance is an essential employer-provided benefit. Like most individuals, people with disabilities rely on it to cover the costs associated with everything from minor ailments to chronic conditions. Given this, some may be reluctant to self-identify if they believe or question whether doing so would put their benefits at risk. Indeed, the Cornell research revealed that 61.5 percent of survey respondents with disabilities stated that the risk of losing health insurance was a “very important” reason not to self-identify.

What can your business do to allay those concerns and make sure employees understand how the health benefits you provide can work to support their health and well-being?

Strategies

- Create a variety of methods for employees to meet criteria for wellness program incentives, to avoid unintentionally excluding people with disabilities from those benefits.
- As required, do not discriminate against an employee with a disability when offering and providing health insurance coverage.
- Ensure that HR officials and supervisors understand the available benefits.
- Include statements of nondiscrimination on benefits materials and websites.
- Highlight a broad range of employee health benefits including mental health services and benefits, wellness initiatives, employee assistance programs (EAPs) and other healthcare services to show commitment to employee health.

ENSURING PRIVACY

Many employees have a desire for privacy at work, especially when it concerns personal information. This may be particularly so when it comes to medical or disability-related information and thus may impact an employee’s decision about self-identification. In fact, according to the research conducted by Cornell, 27.9 percent of survey respondents with disabilities stated that privacy was a “very important” reason to not self-identify.

How can your business ensure employee privacy and effectively communicate related policies and strategies to employees, so that team members with disabilities are comfortable self-identifying?

Strategies

- Be clear about the ways in which the information will be used if an employee self-identifies that they have a disability (i.e., for statistical purposes only and presented in the aggregate).
- Provide employees the option to self-identify within a secure/confidential online system, such as where they maintain tax deductions, paycheck allocations, etc. Ensure the system is separate from electronic personnel documents, performance evaluations, etc.

Chemical and pharmaceutical manufacturer **DuPont** has a long and rich history with EAPs and using them to show commitment to employee health. As an example, DuPont’s global EAP team created and implemented an internal anti-stigma campaign, called “ICU” (“I See You”), the centerpiece of which is an animated video about how to recognize signs of emotional distress in colleagues and encourage them to seek help. Based on its success, DuPont later decided to make the program available to all employers, free of charge, through a partnership with the Center for Workplace Mental Health (workplacementalhealth.org).

- Explain that self-identification is voluntary and how anonymity, confidentiality and privacy will be protected.
- Keep demographic data separate from the application and in data analysis files (rather than in medical files of individual employees).
- Monitor the maintenance of these protections on a regular basis.

Explaining the Reasons for Self-ID

Employees with disabilities who receive reasonable accommodations or participate in targeted hiring programs that take disability into account are required to disclose in order to benefit from such services or programs. As a result, they may be more apt to understand the benefits of self-identification. However, other employees with disabilities may think long and hard about the risks versus benefits of self-identifying, even anonymously. In the Cornell research, 44 percent of survey respondents with disabilities said the fact that their disability has no impact on their ability to do their job was a “very important” reason to not self-identify.

How can your business help employees understand the reasons self-identification is beneficial, beyond the need for reasonable accommodations or participation in targeted programs?

Strategies

- Explain the benefits of self-identification, among them access to resources, accommodations and a community of other employees with disabilities. In addition, emphasize a desire to create and foster an inclusive work environment.
- Be clear that self-identification information helps your business identify gaps in recruiting, hiring, retention and promotion of people with disabilities. Without this data, the business will not know how to best target future diversity efforts.
- Emphasize that this information is used to help build budgets for various disability-related activities, including reasonable accommodations and the disability ERG. Accurate information will help your business provide the right supports for people who need them.

An employee of cosmetic giant **L'Oréal** once shared how for a long time, she wasn't honest with her supervisors and colleagues—and really herself—about her hearing loss and how it impacted her work. In October 2016 she had a particularly bad experience in an important meeting. Not long after, a video campaign called “Breaking the Silence” was broadcast on the L'Oréal internal portal and screensaver. It described the benefits of disability disclosure. She decided that day to “check the box” acknowledging she had a disability and start getting the supports she needed to perform her best on the job.

EY encourages self-ID by ensuring disability is integrated into the larger diversity conversation and communicating how the data collected provides the company demographic information it needs to better support its people. This is facilitated through consistent messages across multiple avenues, including activities in which EY's people are already involved. For example, EY implemented a self-ID campaign called “I Count” and enlisted its ERGs to help promote it via stickers, emails, etc. The stickers in particular—which said “I Count”—were meant to serve as a conversation piece. ERG members were also provided with “elevator pitches” to help explain the campaign's purpose.

- Include a statement on the self-identification form explaining the company's desire to diversify its workforce, support all employees equally, and learn more about employees to assess whether efforts to recruit and retain people with disabilities are effective.
- Assign the disability ERG a key role in communicating the importance of self-identification. For example, an ERG representative might talk about the value of self-identification during onboarding presentations.

Tracking Progress for Continuous Improvement

Tracking data is critical to assessing the effectiveness of your company's disability inclusion efforts. It allows you to better assess your policies and practices and ensure your workforce reflects the communities and customers you serve. In addition, such data is essential to understanding how to better provide employees with disabilities the tools and resources they need to succeed.

Below are various data sources and strategies commonly used by employers to track data about applicants and employees with disabilities. As noted previously, companies contracting with the Federal Government are required to collect disability data under Section 503 of the Rehabilitation Act. Under certain circumstances, other companies may choose to collect it to determine progress toward achieving disability inclusion goals, including creating a workplace climate of inclusion.

Federal Contractors

Federal contractors covered by Section 503 must document specified computations or comparisons pertaining to applicants and employees with and without disabilities. One channel they must use for counting applicants and employees with disabilities is a pre-approved self-identification form. Federal contractors may also count individuals who are otherwise known to have disabilities (for example, individuals who self-disclose their disability to receive a reasonable accommodation or participate in a targeted hiring program that takes disability into account).

When tracking applicants and employees with disabilities, employers may not require an individual to self-identify as a person with a disability. Furthermore, data must be kept separate from the application and confidential and in a data analysis file (rather than in medical files of individual employees). This is because the data is used for statistical purposes and considered only in the aggregate.

In addition to using the pre-approved form, federal contractors may also collect disability data by asking employees to voluntarily self-identify on employee engagement surveys. These surveys are used to understand the disability or overall diversity climate of the business. Often companies will make employment engagement surveys anonymous to increase participation.

Other Employers

For employers not subject to Section 503, it is prudent to adopt similar strategies to determine progress in implementing disability inclusion goals, including those related to voluntary affirmative action programs. These companies may use forms comparable to the pre-approved form federal contractors are required to use and may also similarly count individuals who are otherwise known to have a disability.

Reasonable Accommodations

Employers typically track the number of employees who request reasonable accommodations. When disclosing a disability to request an accommodation, however, an employee or applicant does not need to use any specific language or form. Although an employee may disclose a disability to request an accommodation, he or she cannot be required to self-identify on the forms referenced above. Regardless, data collected about reasonable accommodations is extremely valuable in helping a business respond to the needs of its workforce.

Clearly, effective data, both related to self-identification and self-disclosure, is key to continuous improvement on a company's disability inclusion journey. But the process is as important as the product. Communicating the value of such data, from both the individual and organizational perspectives, can have a significant impact on how accurate a company's measures are and, ultimately, its efforts to foster a disability-inclusive culture.