Steps For Success:

Hiring, On-Boarding, And Retaining People Who Are Blind Or Have Low Vision

AFB American Foundation® for the Blind

Table of Contents

Technology and Accommodations in the Workplace: Insights & Recommendations for Human Resources and Hiring Managers

Introduction

Research has demonstrated that many hiring managers and Human Resources (HR) professionals are not well-prepared to recruit, hire, and retain employees who are blind or have low vision. The recruiting, interviewing, and hiring of blind persons may appear as a daunting undertaking to human resources and other hiring managers. Many hiring managers simply do not know how blind and low-vision employees use computers or office equipment, for example [1]. Workplace technology can also present barriers to inclusion during the recruitment, application, interviewing, onboarding, accommodation, and retention stages of employment.

> **Workplace technology can also present barriers to inclusion during the recruitment, application, interviewing, onboarding, accommodation, and retention stages of employment.**

AFB conducted the Workplace Technology Study (WTS) to better understand and document the technology-related experiences of American workers who are blind or have low vision. In 2021, AFB conducted a survey of 323 blind and low-vision individuals who were employed in a variety of sectors. This report combines the original research findings with policy guidance and recommendations from technical assistance resources on inclusive employment practices. For each stage of the employment cycle, we present a summary of requirements and best practices, findings from the report, and recommendations specifically geared for HR staff and hiring managers to ensure full inclusion of blind and low-vision employees.

BACK TO TABLE OF CONTENTS

Key Definitions

- **Reasonable Accommodations:** Under Title I of the Americans with Disabilities Act of 1990 (ADA), reasonable accommodations are changes to the place where work is performed or the way in which the work is performed that allow people with disabilities equal opportunities in employment while also not causing "undue hardship" on the employer [2]. Three categories of reasonable accommodations are outlined in the ADA: modifications or adjustments to the job application process, modifications or adjustments to the environment, manner, or circumstances that enable the employee with a disability to perform the essential functions of the job, and modifications or adjustments that allow for equal benefits and privileges of employment [3].

- **Undue Hardship:** Undue hardship as outlined in the ADA is an accommodation that would be overly financially burdensome or difficult for an organization to execute. Undue hardship can be determined by a number of factors including cost, financial resources of the organization, and size, number of employees, and type of operation of the organization [3]. This is rarely awarded to employers, as the threshold is set quite high. [4] In US Airways, Inc. v. Barnett, 535 U.S., 122 S. Ct. 1516 (2002), the Supreme Court found that an employee only needs to show that an accommodation seems reasonable, after which the burden of proof shifts to the employer to be specific about why the accommodation would create undue hardship [3]. With the burden of proof weighing so heavily on the employer, undue hardship is rarely granted.

- **Disability:** The ADA defines disability in legal terms rather than medical. Someone is considered to have a disability if they are a "person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such an impairment, or a person who is perceived by others as having such an impairment." [5]

- **Artificial Intelligence:** Congress defines artificial intelligence as "machine-based system that can, for a given set of human-defined objectives, make predictions, recommendations or decisions influencing real or virtual environments" [6]. In HR, this can take the form of systems that leverage big data to predict the applicants' success during the recruitment and screening phases of employment.

Overview
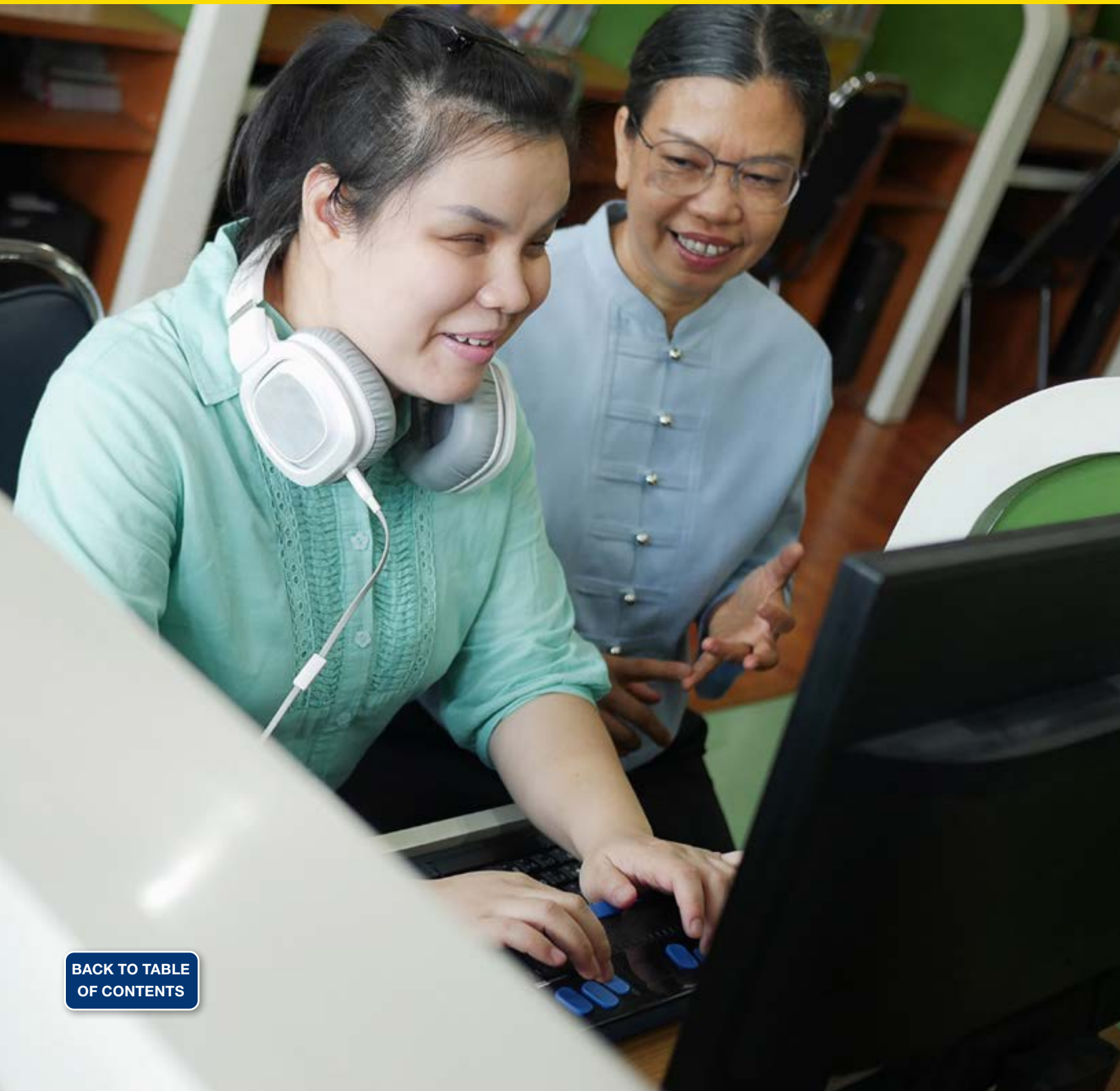
Overview

A record number of people have left their jobs since the start of the COVID-19 pandemic, seeking new or different opportunities that better align with their personal lives and professional interests. Among the pool of job seekers, some have disabilities, including blindness or low vision. Hiring people with disabilities can bring many benefits to an organization: Workers with disabilities are reliable, innovative, and adept at solving problems. Businesses that hire people with disabilities enjoy high customer satisfaction and strong team morale.

With many companies reevaluating their diversity, equity and inclusion efforts due to greater awareness for equitable workplaces, HR departments need to see accessibility as a key tenet in the HR discipline.

Significance of Our Research

Deploying accessible hiring practices is not only the right thing to do, but a requirement under the Americans with Disabilities Act. Through our work and further analysis of the AFB Workplace Technology Study, we obtained qualitative data highlighting the need for employers to integrate accessibility throughout their work instead of treating accessibility as an afterthought. Participant feedback further supports the practice of building a comprehensively accessible website and conveying an explicit commitment to accessibility, as described below.

Although our WTS research did not specifically investigate employers' recruitment practices, some participants noted experiences of accessibility and accommodations being treated as an afterthought, rather than being incorporated into the hiring process from the outset. One WTS participant noted:

"Coming to a new company as somebody who has accessibility needs is usually a nightmare to navigate processes that are optimized for the 99th percentile, and they just don't know how to handle people who have different needs." —*White male in his 40s who became visually impaired as an adult.*

Actions You Can Take

Recruitment of individuals who are blind or have low vision can be enhanced by (1) establishing relationships with vocational rehabilitation personnel and other organizations working with people who are blind or have low vision; (2) creating and maintaining accessible company web pages, job postings and other career information; and (3) emphasizing a commitment to providing accommodations.

In supporting our mission to create a world of no limits, we've outlined additional actions you can take to make accessibility not only a part of your recruitment efforts, but part of the recruitment foundation.

1. **Establish Relationships:** Establishing relationships with organizations that work with people who are blind or have low vision, can be an effective way to find candidates to fit specific jobs within an organization. Job openings can be shared with potential applicants through a variety of organizations. There is a plethora of organizations at the state and national level that have programs designed to reach people with disabilities and actively encourage applicants with disabilities to apply for job openings. Following is a handful of organizations, which depending on your location, could have resources and/or partnership opportunities available.
   - National Federation of the Blind
   - The American Council of the Blind
   - Veteran Readiness and Employment Services through the US Department of Veteran Affairs
   - National Industries for the Blind and Associated Agencies (a network of 100 independent nonprofit agencies across the country that provide a wide range of employment and rehabilitative services for the blind)
   - State Vocational Rehabilitation Agencies (including State VR Services, State Supported Employment Services, and Independent Living Services for Older Individuals Who Are Blind in all 50 states)
   - Centers for Independent Living and State Plan for Independent Living By State

2. **Job Posting & Application Accessibility:** Ensure all organizational web pages, employment applications, and the job application process remains accessible, with maintenance to ensure continuity per the Web Content Accessibility Guidelines (WCAG) international standards, including WCAG 2.0, WCAG 2.1, and WCAG 2.2 The following reference materials provide additional context around how to make web content more accessible for people with disabilities.
   - WCAG 2.1 At A Glance
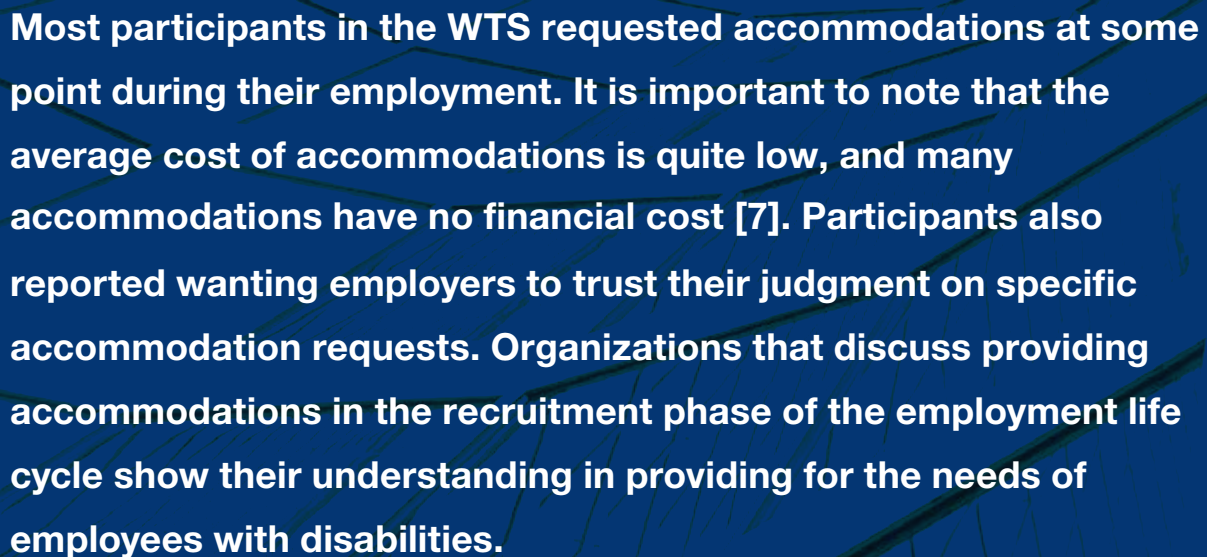   - AFB Digital Inclusion Intro for Developers

3. Create A Process for Requesting Reasonable Accommodations:

A request for reasonable accommodation is the first step in an informal, interactive process between the employee and the employer. Employers who emphasize a commitment to providing accommodations provide assurance that employees who are blind or have low vision will be able to work in an environment where they are able to perform their job tasks effectively. Reasonable accommodations for applicants should be clearly stated during the hiring process, as well as for employees. Wording should be specific about reasonable accommodations that have been or could be provided within the organization (i.e., testimonials from current employees with disabilities).

This process should include:

- Method and/or way for requesting accommodations
- Contact person for requests, including email and phone number
- Online form that is fully accessible
- Include language to your job application, website, and Career Page
- Accessible screening tests and/or additional forms for interviews
- Clearly state benefits for persons with disabilities, such as flextime, telework, and work-life balance.

Most participants in the WTS requested accommodations at some point during their employment. It is important to note that the average cost of accommodations is quite low, and many accommodations have no financial cost [7]. Participants also reported wanting employers to trust their judgment on specific accommodation requests. Organizations that discuss providing accommodations in the recruitment phase of the employment life cycle show their understanding in providing for the needs of employees with disabilities.

4. **Website and Mobile App Maintenance:** Creating and maintaining accessible web pages and mobile recruitment apps, not only allows for qualified candidates to find job openings, but also shows an organization's commitment to inclusion and accessibility. A comprehensively accessible web page helps all applicants, regardless of disability status, understand the organization, its products, values, and people.

5. **Formatting and Captions on Website(s) and Social Networks:** Ensure accessible formatting is used within posts on networking platforms, videos are described and captioned, and that all forms are accessible using only the keyboard. Without an accessible career page, prospective employees may not know there is a job opening available or may not have access to all the information about the job. A comprehensive, inclusive career page will entice qualified candidates with disabilities to apply for job openings. Showcasing a message about diversity and inclusivity from someone high up in an organization shows applicants how people with disabilities are valued at every level of the organization.
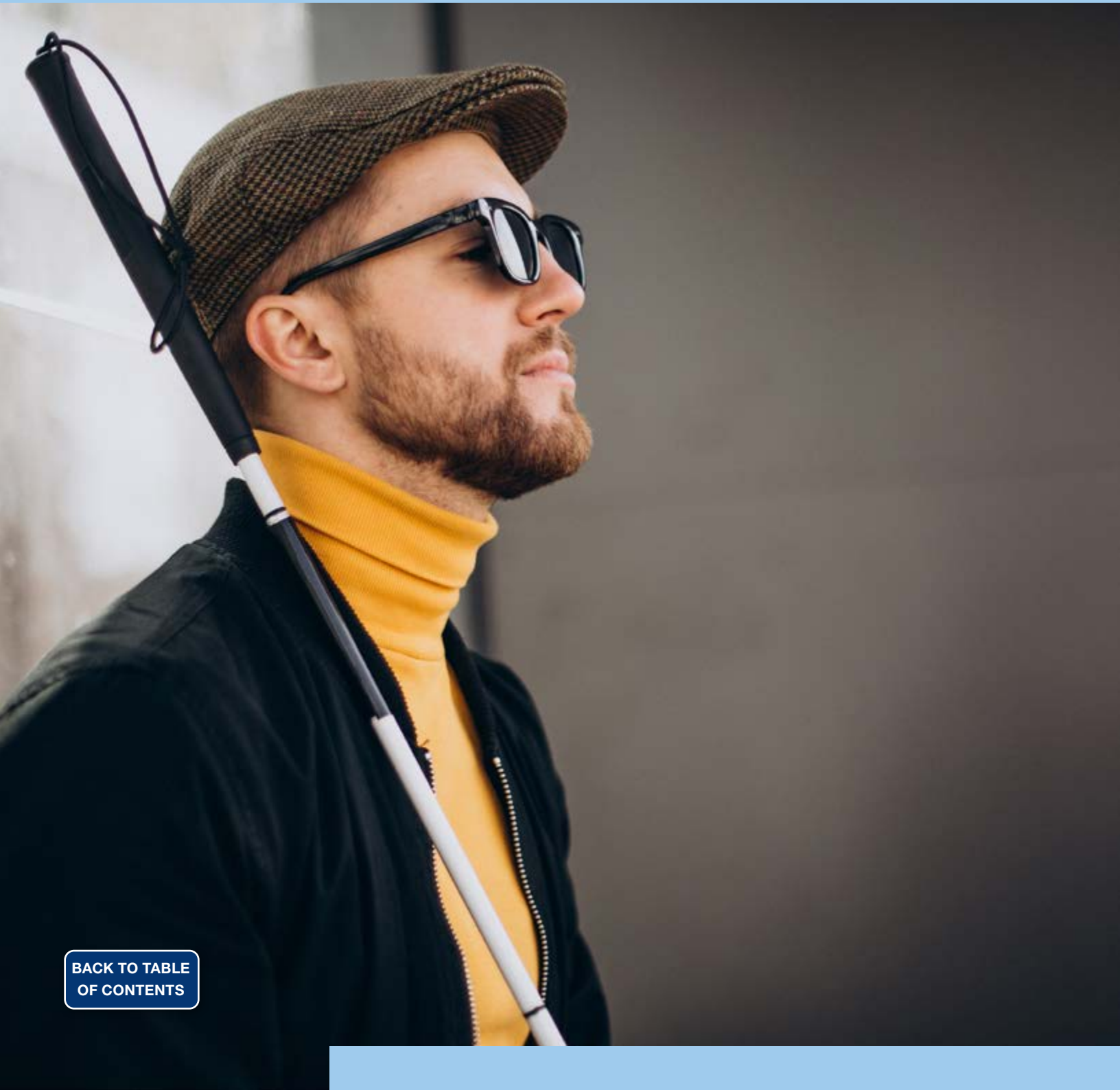
Application, Assessment, and Interviewing

Application, Assessment, and Interviewing

Having a recruitment strategy that promotes diverse hiring is not only good for society, but a strong business case can be made for ensuring your teams are inclusive. As you look to grow your teams and recruit new talent, it's important that you use every resource available, and reach out to every individual or group, including those with visible or invisible disabilities. You're not only legally mandated to make sure your hiring practices are ADA compliant, but if your website, interview practices, and office itself aren't accessible and friendly to disabled applicants, you're doing your company a disservice by essentially eliminating an entire pool of potentially immensely talented candidates – just like that.

Significance of Our Research

Our research in the WTS demonstrated that best practices for access and accommodations during the hiring process are not consistently implemented. About one-third of WTS participants reported difficulties accessing job applications and screening assessments. Our research also sheds light on the complexities of disclosing disability in the workplace; WTS participants disclosed at differing points during the hiring process, while some participants did not disclose their disability at all. These findings support the need to respect candidates' choices regarding disability disclosure.
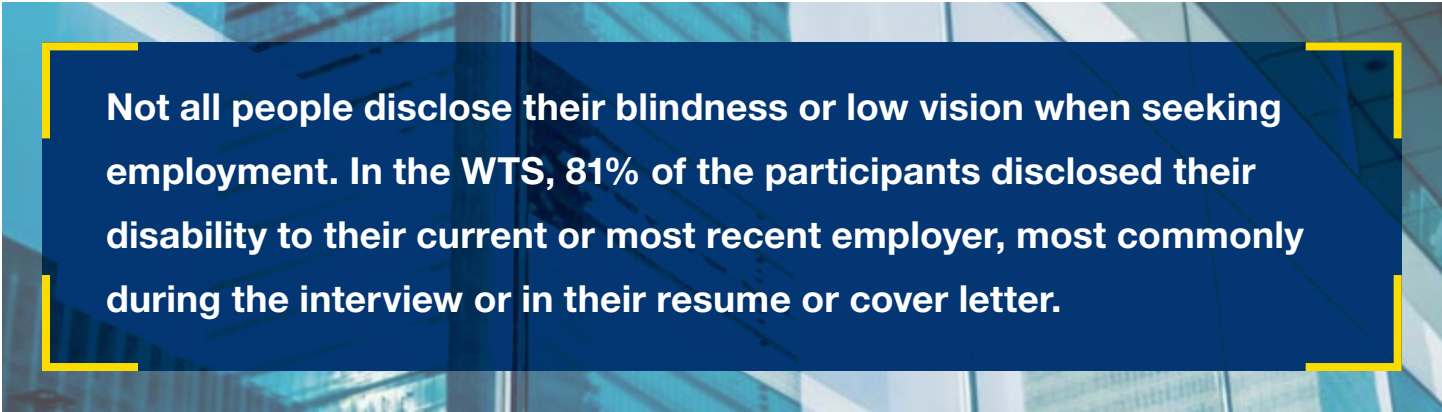
Actions You Can Take

Web content accessibility guidelines can help you determine what needs to be done, however top recommendations include:

- **Ensure** that all job application forms and required assessments are fully accessible to people using assistive technology. Candidates who are blind or have low vision must be able to access both your job postings on your website, and any job boards you're posting on – and be able to fill out the application itself.

- **Ensure** that AI tools used in applicant screening do not systematically exclude applicants with disabilities.

- **State a commitment** to providing reasonable accommodations to promote an inclusive culture where candidates feel safe requesting accommodations.

- **Refrain from asking** about a candidate's disability or accommodation needs until they are offered a position.

- **Presume competence,** assuming job candidates who are otherwise qualified can perform job tasks with or without reasonable accommodations.

Application and Interviewing Promising Practices

1. **Rights and Responsibilities: Accommodations:** Employers are generally obligated to provide effective reasonable accommodations if they are requested by the applicant. [3, 5, 8] Furthermore, Employers are not allowed to ask questions about a disability or accommodation prior to making an offer of employment.

Until a job offer has been extended, the ADA and the Rehabilitation Act of 1973 do not allow employers to ask an applicant about the nature or condition of their disability. Employers may invite applicants to self-disclose disability status for affirmative action purposes that aid the applicant. That information about disability must be kept separate from other application information and may only be used to benefit the applicant. Employers may ask whether the individual will require an accommodation and what type if they voluntarily disclose. After the job offer has been made, the employer may ask additional questions of future employees with disabilities for the purpose of providing accommodations and determining whether the disability poses a direct threat to health or safety. In general, employers may not discriminate if the employee can safely perform essential job tasks with or without a reasonable accommodation. For more information on employers' responsibilities, see "Blindness and Vision Impairments in the Workplace and the ADA" published by the Equal Employment Opportunity Commission.

Not all people disclose their blindness or low vision when seeking employment. In the WTS, 81% of the participants disclosed their disability to their current or most recent employer, most commonly during the interview or in their resume or cover letter.

2. Rights and Responsibilities: Screening Out: The ADA notes that "screening out" a person with a disability (losing the job opportunity as a result of a lowered performance on certain selection criteria) is unlawful if it screens out an otherwise qualified individual with a disability who is able to perform the essential functions of the job with or without accommodations. Because AI can screen out applicants with disabilities, the EEOC recommends that employers test screening tools and question developers to find out if disability was considered in the making of the tool. Employers can also offer a variety of accessible formats to collect information about candidates. In addition, employers should be transparent about what traits the tool is measuring and how, so that employees can request reasonable accommodations if they feel it is necessary for them [6].

Example: A prospective employee who is blind is required to perform a gamified test that uses video and pictures to assess traits such as problem solving and speed of response. No audio description is provided for the visual depictions, therefore causing the applicant to miss out on crucial information. The potential employee is "screened out" by the software. The applicant is qualified for the essential job duties. This is unlawful according to the ADA as reasonable accommodations were not provided that could have allowed the applicant to be considered for a job opportunity they were qualified for.

Having intersecting identities may affect a person's decision whether or not to disclose. In WTS, while 85% of the White participants disclosed their disability to their employer, only 75% of the non-White participants did. These findings show there is still work to be done in ensuring people who are blind or have low vision, from minority backgrounds, know that their disability status will not affect employment opportunities. Participants who had become blind or lost vision more recently were also less likely to disclose their disability than the participants who had been blind or had low vision from a young age.

3. **Artificial Intelligence Considerations:** Recruitment and hiring processes should be accessible and equitable. Artificial Intelligence (AI) may act to reduce the opportunities for people with disabilities to be equitably considered for jobs they are qualified for. AI algorithms can reflect bias against people with |disabilities and against the purposes of diversity in general, especially when the data on which they are trained is biased or unvalidated for diversity [9]. Using data like "personality traits," "cultural fit," "outcome data," and "aptitude tests" can be misleading and automatically cut out a number of candidates who are qualified and represent diverse populations. Even algorithms that consider certain educational measures and devalue candidates with employment gaps can discriminate against people with disabilities; for example, people with newly acquired disabilities may leave the workforce temporarily to learn adaptive skills and master assistive technology. Such individuals may return to the workforce prepared for employment but could be unwittingly excluded by AI algorithms due to the gap in their resume.

Employers should be aware that AI takes shortcuts whenever possible, seeking easy correlations among data; therefore, AI can become more biased in its analysis. Since most AI processes are kept as proprietary trade secrets, knowing their biases can be impossible.

> **Regarding disability disclosure, one participant wrote:**
> **"It's uncomfortable [to ask for accommodations] because I don't think they're knowledgeable about the needs of blind and visually impaired people."** *—Hispanic/Latinx female in her 50s who became visually impaired in childhood*

Onboarding & Completing Paperwork

Onboarding & Completing Paperwork

Completing paperwork is a main component of the onboarding process. Tax forms, contracts, and security clearances are just some of the documents people may need to complete before being able to engage directly in job-specific work tasks.

HR professionals need to be aware of potential paperwork accessibility challenges that may arise for people who are blind or have low vision so they can be proactive in having accommodations available. Examples of more accessible paperwork procedures include PDF forms that are fillable with only the keyboard, using accessible e-signature software, offering someone to read and scribe for printed documents, and sending accessible digital copies of agreements in advance of signing them in person.

Hiring managers can have a variety of accessibility tools available for newly hired employees who are blind or have low vision so that onboarding is not delayed by inaccessibility. An employee's first experience with the organization is important for setting the tone about inclusion. HR professionals who are prepared with accommodations show the organization's commitment to diversity and inclusion.

Significance of Our Research

Employers are required to provide full access to all benefits and privileges of employment, including onboarding and training. Despite this, our workplace technology study found that accessibility challenges were commonly encountered during the onboarding process, suggesting that promising practices for providing accessible onboarding and training procedures are not being consistently implemented. The research also showed great variability in the effectiveness and timeliness of accommodations provided to newly hired employees who are blind or have low vision. WTS findings contextualize promising practices around telework as an accommodation, describing the pros and cons of telework for blind and low-vision workers. Finally, WTS data on the prevalence of multiple disabilities among working people who are blind or have low vision support the practice of engaging in an interactive accommodations process.

> **An employee's first experience with the organization is important for setting the tone about inclusion. HR professionals who are prepared with accommodations show the organization's commitment to diversity and inclusion.**

Actions You Can Take

- **Ensure** all onboarding paperwork is fully accessible to assistive technology users. If forms are only available in print, provide reasonable accommodation, such as human reader support, to complete paper forms.

- **Ensure** employee training programs are fully accessible to employees with disabilities and assistive technology users. Procure accessible products and platforms, provide appropriate accommodations before and during trainings, and require presenters to use accessible meeting and presentation practices.

- **Be knowledgeable about** how to fulfill common accommodation requests for people who are blind or have low vision.

- **Consider** flexible work arrangements.

- **Implement** a comprehensive accommodations policy that standardizes requesting and fulfilling accommodations, only requires pertinent disability documentation, follows an interactive process, results in timely action, offers appeal procedures, and allows for changes when the disability or technology changes.

- **Create** a centralized accommodations process, including a centralized budget that will cover all accommodation costs.

Workplace Technology Study Research Call Outs

Findings indicate an area of opportunity for HR managers to examine their paperwork processes for accessibility, online and in-person training, telework and remote work, the initial accommodation process, and additional disabilities.

- **Paperwork:** When filling paperwork out in person, 59.0% of participants agreed or strongly agreed that they experienced accessibility challenges due to their blindness or low vision. In person on-boarding was significantly less accessible for those who worked for the federal, state, or local governments than for those working for nonprofits or for-profit companies; for example, 74% of WTS participants working for state or local governments encountered access challenges with in-person onboarding. Additionally, 47.7% of participants agreed or strongly agreed that they experienced accessibility challenges when filling out paperwork online, regardless of employer type. Filling out paperwork may be troublesome in person or online, but online paperwork may be more accessible because participants can use AT tools.

- **Training:** Our research in the WTS demonstrates significant gaps in the accessibility of both in-person and online training. For online training, 60.3% of WTS participants agreed or strongly agreed that online training was accessible, but 25% disagreed or strongly disagreed and 14% neither agreed nor disagreed. For in-person training, 60.8% of participants agreed or strongly agreed that training was accessible. Although the ADA requires training to be accessible to employees with disabilities, the findings from the WTS indicate that this is not always what is happening in practice. Participants were asked about the impact of training that is not fully accessible. They reported that productivity is lost, they feel stressed and frustrated, and their relationships with colleagues are negatively impacted. Thus, accessibility has wide-ranging effects in creating a positive work environment for all employees.

> **Although the ADA requires training to be accessible to employees with disabilities, the findings from the WTS indicate that this is not always what is happening in practice.**

> **"I was usually able to get needed accommodations when I worked for the federal government. However, it often took a long time which negatively impacted my productivity."**

- **Telework/Remote Work:** Our research demonstrates that some individuals who are blind or have low vision chose to telework even before the pandemic. In the WTS, 125 (41.4%) of 327 participants reported they were part-time or full-time teleworkers prior to March 2020. After the pandemic began, 90% of the participants were teleworking at least part-time. It should not be assumed that all employees who are blind or have low vision want to telework as an accommodation. Of 190 respondents who were engaged in telework during the COVID-19 pandemic, 74 (39.0%) strongly preferred or preferred to continue to work from home and 86 (43.3%) preferred or strongly preferred to return to the worksite.

Some of the challenges noted about teleworking were the limited accessibility of video conferencing platforms and difficulty getting IT help or sighted assistance. Participants also noted positive aspects of telework specific to their disability which included not having to commute, having control over their equipment setup, reduced auditory distractions, not worrying about a screen reader bothering coworkers, not being discriminated against due to blindness or low vision, and their blindness or low vision being less noticeable. The effectiveness of remote work as a reasonable accommodation should be determined on a case-by-case basis and through the interactive process.

- **Initial Accommodation:** Companies can benefit from the creation of a formal process for accommodation requests. In the WTS, 54% of participants made accommodation requests during the hiring process. Participants reported a wide range of experiences with securing accommodations; many received accommodations in a timely and effective manner, but some faced delays and challenges. WTS participants reported a great deal of variation in the process for requesting and receiving accommodations, including differences in the review process and the time it took to receive a requested accommodation. One participant said: "I was usually able to get needed accommodations when I worked for the federal government. However, it often took a long time which negatively impacted my productivity."

- **Additional Disabilities:** Our research demonstrates that workers who are blind or have low vision may also have additional disabilities requiring accommodation. About 40% of WTS participants indicated that they had additional disabilities or health conditions apart from their visual impairment. Of the 126 participants with additional disabilities or health conditions, 38 (30.2%) requested an accommodation that was not related to blindness or low vision. Some additional disabilities, such as chronic health conditions or mental health disabilities, may not be obvious unless an employee chooses to disclose them. HR managers can let employees know that accommodations are not limited to only one disability but can be given for any qualifying disability. HR professionals can help dispel the stigma of disability by creating an atmosphere that welcomes different ways of accomplishing work tasks and supports employees in methods that are accessible to them.

Promising Practices

- **Paperwork:** Paperwork is a main component of the onboarding process. HR professionals need to be aware of potential paperwork accessibility challenges that may arise for people who are blind or have low vision so they can be proactive in having accommodations available. Examples of accessibility solutions for paperwork include PDF forms that are fillable with only the keyboard, using accessible e-signature software, offering someone to read and scribe for printed documents, and sending accessible digital copies of agreements in advance of signing them in person.

- **Training:** Onboarding often requires initial training. This training may be job-specific such as training on systems or procedures specific to the duties of the position, or training may be more general to all employees such as anti-sexual harassment training. Employees with disabilities have a right to receive information from training in an accessible manner.

HR professionals can help dispel the stigma of disability by creating an atmosphere that welcomes different ways of accomplishing work tasks and supports employees in methods that are accessible to them.

BACK TO TABLE OF CONTENTS

Training is covered under the provision for reasonable accommodations that guarantees equal benefits and privileges of employment [5]. Employers cannot deny training to an employee just because the training is not accessible. One way for employers to ensure training is accessible is to have all training programs tested for accessibility before purchasing or approving them.

Employers can follow Promising Practices to ensure the accessibility of training. These include:
- Sharing slide decks in advance
- Using accessible software and websites for online trainings
- Verbally describing all content during presentations or videos
- Ensuring any online assessments can be completed via a keyboard.

- **Telework/Remote Work:** EEOC guidance states that "Changing the location where work is performed may fall under the ADA's reasonable accommodation requirement of modifying workplace policies, even if the employer does not allow other employees to telework. However, an employer is not obligated to adopt an employee's preferred or requested accommodation and may instead offer alternate accommodations [instead of telework] as long as they would be effective." [13]

Even if telework is not an established policy with the company, the employer may still provide it as a reasonable accommodation for a person with a disability. If telework is deemed to cause undue hardship on an organization, then modifications to work policies, physical makeup, and schedules may substitute.

Telework policies may have to be modified for persons with disabilities to provide appropriate accommodations. Employers should provide the same reasonable accommodations provided at the worksite for telework. For example, if an employee has assistive technology installed on a computer at the workplace, that software should also be installed on the computer the employee uses for teleworking.

- **Practices:** The ADA states that a person is qualified for the job if they can perform the essential functions of the job with or without reasonable accommodations. An organization cannot refuse to hire an applicant or fire an existing employee with a disability because they require reasonable accommodations to complete work tasks [10].

HR professionals should supply newly hired employees with an overview of onboarding activities, so employees know if they need to request a reasonable accommodation at any step in the process. During onboarding, employers can legally ask if an employee needs any reasonable accommodations [11]. During the initial request for accommodation process, organizations should engage in an interactive process to determine what the individual with a disability needs to access their work environment [8].

An interactive process involves dialogue between the individual with a disability and a representative from the organization. The employee with a disability and the employer is communicating back and forth to determine the best fit for the accommodation. Even within the same disability group, individuals with disabilities may require different accommodations. The Job Accommodation Network breaks down the process into four steps: recognizing the accommodation request, gathering information, exploring accommodation options, and choosing an accommodation [8].

Sometimes the accommodation will be obvious, and the process can be completed in a single conversation. Employees often know what they need to be successful in the workplace, and their input is valuable. Although the employer is not required to provide the exact accommodation requested, effective accommodation is necessary. The organization may need to contact outside resources such as vocational rehabilitation or assistive technology specialists to identify reasonable accommodations.

- **Rights and Responsibilities:** Employers may suggest reasonable accommodations for employees with disabilities to perform work tasks. If the employer suggests an accommodation that is not effective for the employee, the employee has the right to ask for a different accommodation [2].

Example: An employee with ocular albinism indicates that the lighting at her workstation is causing her eyestrain leading to headaches and visual fatigue. The employer asks the employee if the conditions are generated by the fluorescent overhead lighting or a nearby window with natural light coming in. The employee informs the organization's representative that she believes it is the fluorescent lighting. They explore accommodation options for moving the employee's workstation or installing a dimmable switch for the overhead light. The employee would like to stay at her current workstation because of proximity to colleagues, and so the dimmable switch is chosen as the appropriate accommodation. In addition to engaging in an interactive process, having a centralized office to oversee accommodations is often most efficient in receiving requests, implementing the request, and following up on the implementation of the request. Requests that are submitted informally should still be considered and accommodated; employees may need support navigating established centralized processes.

Organizations can adopt a "centralized accommodation program"[12] to make the process for acquiring accommodations straightforward for all parties including employees with disabilities, supervisors, and HR professionals. Some key points to consider when forming a program are funding sources, who is responsible for executing the responsibilities of the program, training for team members involved in executing the program, developing systems and processes, and the ongoing analysis of the effectiveness of the accommodation program. Centralizing the accommodation process reduces department-level disincentives to provide accommodation. Funding accommodations out of a centralized budget reduces department-level financial obstacles to procuring accommodations.

The employer must provide the accommodation within a reasonable amount of time [3]. Although the ADA does not name a specific time quota for procuring reasonable accommodation, the employer should work quickly to allow the employee with a disability to effectively access their work environment.

Supporting & Retaining Talent

Supporting and Retaining Talent

Retaining talent is a sign of success for an organization. Companies whose employees stay with them long term save both time and money. Understanding the importance of retaining talent and strategies to use can help your business enhance its productivity with more expert employees.

Studies show companies with inclusive cultures have higher employee retention rates and less trouble recruiting new employees than companies without inclusivity. Turnover rates skyrocket when employees have vastly different experiences from their peers, or they sense unfairness. However, for persons with disabilities, inclusion begins with the application process, is nurtured during onboarding, and continues during their employment. It does not end once employees are hired and complete onboarding. Findings from the WTS reveal significant gaps in access to technology on the job, as well as access to timely, effective training on newly adopted technologies.

Actions You Can Take:

- **Implement** an accessibility policy that requires all documents, tools, procedures, and procurement to be accessible, usable, and compatible with assistive technology.

- **Seek feedback** from employees with disabilities on the accessibility of new procedures and tools.

- **Create** a disability-focused Employee Resource Group, an Assistive Technology Users Group, or other discussion groups as appropriate.

- **Collaborat**e with IT staff and outside assistive technology experts to test accessibility of new workplace technologies.

- **Create a culture of inclusion** so employees are comfortable requesting new accommodations if needed over the course of their employment.
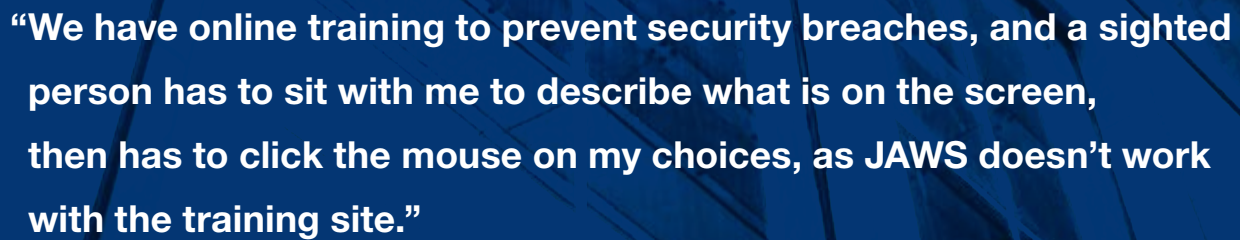
> **For persons with disabilities, inclusion begins with the application process, is nurtured during onboarding, and continues during their employment.**

Significance of Our Research

The WTS study identifies the need for accessibility considerations when adopting new technologies and training employees on their use, seeking appropriate input from employees with disabilities, adopting clear organization-wide accessibility policies, and ensuring all staff are trained on disability awareness and inclusion.

- **Seeking Appropriate Input From Employees with Disabilities:** In the WTS, only about half of the participants indicated that their employer's I.T. staff are knowledgeable about their assistive technology needs. Participants who experienced accessibility challenges often reported that I.T. staff did not know how to resolve their difficulties and that they were expected to shoulder much of the responsibility of identifying solutions, which sometimes interfered with their productivity. Engaging outside accessibility experts and employee resource groups can reduce this burden on blind and low-vision employees to resolve their own accessibility issues at work.

- **Procurement and Training on New Technology:** Half of the WTS participants reported that their employer had adopted new technology which was not accessible or usable for them. Furthermore, despite the requirement to provide employees with disabilities access to the same training as employees without disabilities, significant gaps remain as documented in the WTS. Specifically, when asked what happens when their company adopts new technology that requires training, 39% of the participants reported that their employer either did not provide timely training or that the training was timely but not effective for their specific accommodation needs. The lack of timely and effective training led to reduced productivity and/or experiences of being perceived as less capable by colleagues. HR may play a critical role in collaborating with IT to plan how training will be rolled out, and to speak up during the planning stages about the types of accessibility currently required across the company's teams. While experiences of employees who are blind or have low vision varied, some room exists for improvement in ensuring that accessibility is at the forefront of technology procurement and training.

- **Disability Awareness and Inclusion:** WTS participants described challenges with accessing shared documents and employer-required training. Regarding document sharing, participants called out PowerPoint presentations as often being inaccessible because of the visual nature of the tool, a lack of description of the slides, and not having access to the information prior to the presentation. If PowerPoint is used, sharing slides ahead of time allows employees to view the slides using AT before the slides are presented to the full group. Any images in PowerPoint slides should be labeled with alt tags.

> **"We have online training to prevent security breaches, and a sighted person has to sit with me to describe what is on the screen, then has to click the mouse on my choices, as JAWS doesn't work with the training site."**

In addition to PowerPoint presentations, some participants had difficulties when sighted colleagues would share documents that were not properly formatted for accessibility. Shared document editing may require screen reader users to walk through extra rounds of transferring documents into more accessible formats in order to be read. Such changes can also impact the ease of navigation, formatting, and other features. Creating organizational accessibility policies that specify accessible formats for sharing documents is important to ensuring a productive environment for all employees.

As was described in the previous section, some WTS participants reported difficulties accessing employer-provided training, including self-paced online training. Improved consistency is needed with ensuring training accessibility for all employees with disabilities. For example, WTS participants noted difficulty accessing material containing unlabeled graphics and buttons. it is important for organizations to have a process for reporting inaccessibility and taking action to correct it. Some participants reported that their organization's solution to inaccessibility was to have a sighted employee sit with them and explain the components of the training. This is not an effective, long-term solution that honors the confidentiality of the employee with a disability. One WTS participant explained: "We have online training to prevent security breaches, and a sighted person has to sit with me to describe what is on the screen, then has to click the mouse on my choices, as JAWS doesn't work with the training site."

- **Changes in Visual Abilities:** Changes in disability such as vision loss may affect the need for accommodation. Although the majority of WTS participants (65%) acquired their visual impairment before the age of 2, among the general population vision and hearing disabilities often begin during adulthood. Furthermore, people born with progressive causes of vision loss may experience significant decreases in usable vision during their working lives. In the WTS, 57 (55.9%) of 102 participants experienced a decrease in the ability to read print over the previous 5 years, with thirty-two (51.5%) of those respondents requesting new accommodations.

These accommodations included braille displays, closed-circuit televisions, screen reader software, changes in lighting, and sighted assistance. People who are blind or have low vision may also have changes to accommodation needs based on other conditions as indicated by the 23 out of 278 (8.3%) of participants who requested a new accommodation when experiencing a change in another disability or health condition.

Promising Practices

- **Seeking Appropriate Input From Employees with Disabilities:** To confirm that products are accessible, organizations will need to test products. Some organizations ask employees with disabilities within the company to take on the extra duty of trying out products that are being considered for adoption. While some employees with disabilities may want to be part of the procurement process, others may feel that it draws them away from their primary work tasks. The opportunity can be offered without pressure or the expectation to perform the accessibility testing.

Outside testers of accessibility may be able to provide a more balanced assessment than internal employees. Additionally, testers can be recruited with specialized knowledge of accessibility promising practices. Organizations can hire consultants to test the accessibility of hardware and software. Organizations can also work with vendors to ensure artificial intelligence technology is developed with diversity, equity, inclusion, and accessibility at its core.

Organizations can also seek input from employees with disabilities on procurement of AT and other disability-related issues through employee resource groups (ERGs) and Assistive Technology Users Groups. ERGs are groups of employees who share similar interests. Such groups can form around disability identification. Encouraging the formation of ERGs related to disability shows employees that the organization cares about that group of employees and seeks to give a voice to those traditionally marginalized identities.

Members of Assistive Technology Users Groups can share information, troubleshoot, and support one another in the use of AT in the workplace. ERGs and Assistive Technology Users Groups for people with disabilities can grow by informing new hires about the ERG and getting them set up with a point of contact if they are interested in joining the group. HR managers can facilitate the success of these groups by maintaining lists and information about the company's existing groups and by being available to sponsor an ERG if needed.

- **Procurement and Training on New Technology:** Accessibility starts before an organization purchases new hardware or software. Procurement of technology is an important part of making sure accessibility is honored [14]. Prior to purchasing new technology, vendors should provide proof that their product is able to be used in an easy, productive manner by all employees. HR departments can make a difference by asking vendors about product accessibility, selecting the most accessible product that meets the need (even if it wouldn't be the first choice), committing to advocate for employees with disabilities when problems arise, and working with IT departments to make accessibility a true priority for procurement.

Procurement is only one part of ensuring the adoption of new technology is accessible. Training in technology must also be organized so that all employees are able to access the core information relevant to their use of the hardware and software.

- **Disability Awareness and Inclusion:** Accessibility requires forethought. All participants in meetings (e.g., hosts, trainers, attendees) should be aware of accommodations. These may include maintaining a fragrance-free environment or the correct way to format documents [15] that will be shared. Slides and documents should be sent out ahead of time so that all employees have time to follow along in their most accessible format. All staff need to be trained in diversity and disability awareness as well as making communications and work-related information accessible. Accommodations should be made in face-to-face meetings, virtual meetings, communications, and physical space. Meetings and trainings also need to be accessible from the outset and organized with accessibility in mind.

If the meeting or training is to be held virtually, video conferencing platforms should be vetted for accessibility. Trainers should be aware that screen reader users can be distracted by robust chat discussions, so information should be communicated orally instead of in chat when possible. Trainers and presenters should announce keystrokes for muting/unmuting and raising hand for screen reader users. Documents should be generated and shared in text form rather than in image form. Activating automated captions and providing opportunities to request an interpreter may be helpful to people who are deaf or hard of hearing. Trainers should give descriptions of any props, videos, and slides during the presentation. Organizations such as Disability:IN can help employers develop better inclusion practices [16].

• **Changes in Visual Abilities:** As with initial accommodation requests, the sole responsibility for knowing what accommodation to use should not be on the employee with a disability. Sometimes, an employee knows what works for them, and it makes sense to listen to their expertise. Other times, though, an employee may identify an accessibility barrier but may still be learning a new process within the company and feel unsure of how to modify it to improve accessibility.
In cases where the employee doesn't have a recommended solution, HR managers can seek information on various types of accommodations from such agencies as PEAT, JAN, and EARN.

Organizations should also consider extending return to work programs that were traditionally aimed at employees returning from workplace injuries to people who have other disability needs such as a sudden loss in vision unrelated to the workplace [17]. Those employees may need additional training to accommodate their new visual abilities such as orientation and mobility (cane travel), targeted assistive technology skills, or braille instruction. They can benefit from time off to immerse themselves in training specific to blindness or low vision.
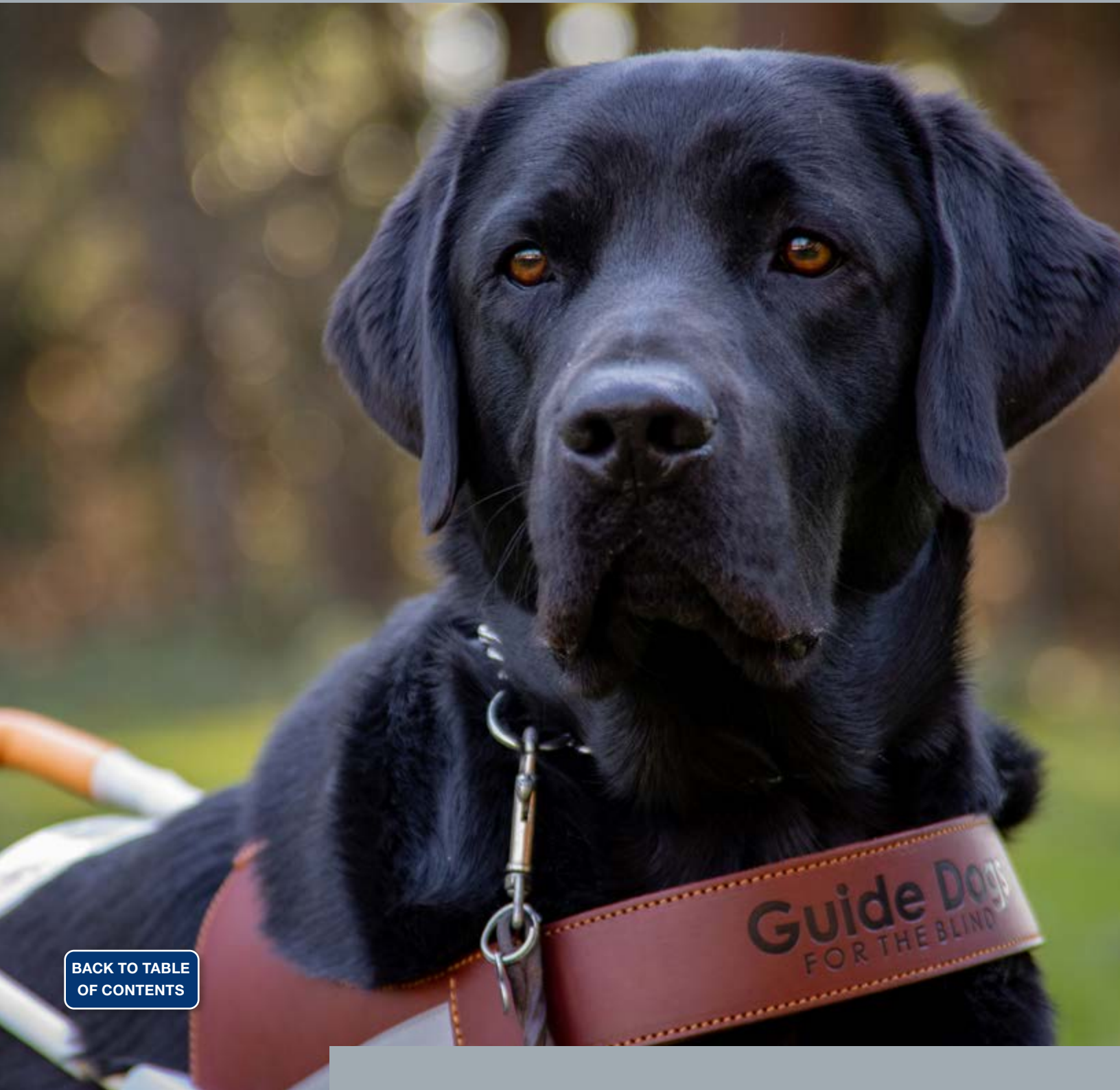
References

References

[1] Mississippi State University National Research and Training Center on Blindness and Low Vision. Blind People Can't Perform This Job…Or Can They? https://www.blind.msstate.edu/sites/www.blind.msstate.edu/files/2020-05/McDonnall-Blind_people_can%27t_perform_this_job.pdf

[2] U.S. Equal Employment Opportunity Commission. Small Employers and Reasonable Accommodation. https://www.eeoc.gov/laws/guidance/small-employers-and-reasonable-accommodation

[3] U.S. Equal Employment Opportunity Commission. Enforcement Guidance on Reasonable Accommodation and Undue Hardship under the ADA https://www.eeoc.gov/laws/guidance/enforcement-guidance-reasonable-accommodation-and-undue-hardship-under-ada

[4] How do I know if a work accommodation will create an undue hardship?SHRM: https://www.shrm.org/resourcesandtools/tools-and-samples/hr-qa/pages/createanunduehardship.aspx

[5] A Guide to Disability Rights Laws https://www.ada.gov/cguide.htm#anchor62335

[6] U.S. Equal Employment Opportunity Commission. The Americans with Disabilities Act and the Use of Software, Algorithms, and Artificial Intelligence to Assess Job Applicants and Employees. https://www.eeoc.gov/laws/guidance/americans-disabilities-act-and-use-software-algorithms-and-artificial-intelligence

[7] Costs and benefits of accommodation. https://askjan.org/topics/costs.cfm

[8] Job Accommodation Network. Interactive process. https://askjan.org/topics/interactive.cfm

[9] PEAT. The Fast Pace of AI Adoption. Risks of AI in Hiring Tools. https://www.peatworks.org/ai-disability-inclusion-toolkit/risks-of-ai-in-hiring-tools/

[10] PEAT. Nondiscrimination, Technology and the Americans with Disabilities Act (ADA). https://www.peatworks.org/ai-disability-inclusion-toolkit/ai-disability-inclusion-resources/nondiscrimination-technology-and-the-americans-with-disabilities-act-ada/

[11] Ask EARN. Reasonable Accommodations. https://askearn.org/page/reasonable-accommodations

[12] EARN. Centralized Accommodation Program. https://production-askearn-org.s3.amazonaws.com/EARN_2020_Checklist_Centralized_Accommodation_Programs_ae2962329c.pdf

[13] EEOC. Work at Home/Telework as a Reasonable Accommodation. https://www.eeoc.gov/laws/guidance/work-hometelework-reasonable-accommodation

[14] PEAT. Podcast: Making Workplace Technology Accessible. https://www.peatworks.org/podcast-making-workplace-technology-accessible/

[15] PEAT. Making Documents Accessible. https://www.peatworks.org/making-documents-accessible/

[16] Disability:IN. https://disabilityin.org/

[17] Curb Cuts of the Middle Class. Recruiting, Hiring, Retaining, and Promoting People with Disabilities. https://www.eeoc.gov/sites/default/files/migrated_files/eeoc/interagency/employing_people_with_disabilities_toolkit_february_3_2015_v4-2.pdf

AFB American Foundation®
for the Blind

www.afb.org

Please join the conversation:

americanfoundationfortheblind

afb1921

american-foundation-for-the-blind

EXECUTIVE OFFICE

1101 Wilson Blvd, 6th Floor

Arlington, VA 22209

P: (202) 469-6831

F: (646) 478-9260