From Compliance to Culture: Reimagining the Role of Self Identification in the Era of Disability Inclusion

Executive Summary: Phase I Analysis
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Disability:IN

Abstract

Workforce disability inclusion has historically been incentivized by compliance with government regulations. However, surging employee and investor demands for inclusive corporate culture is creating a new call to action for companies to modernize the collection, promotion, and utilization of voluntary self identification data. Well-timed outreach, multipronged communications, and workforce re/education can curate a company culture that supports self identification with a trusting, informed, disability inclusive community.

This paper makes the case for companies to embrace an **Empirical and Experiential Model of Disability** and lead the way with **corporate disclosure** of disability inclusion to foster reciprocity that enables vibrant participation from talent with disabilities in the workforce and attracts investors interested in corporate social performance.

Empirical

- Material corporeal reality of disability
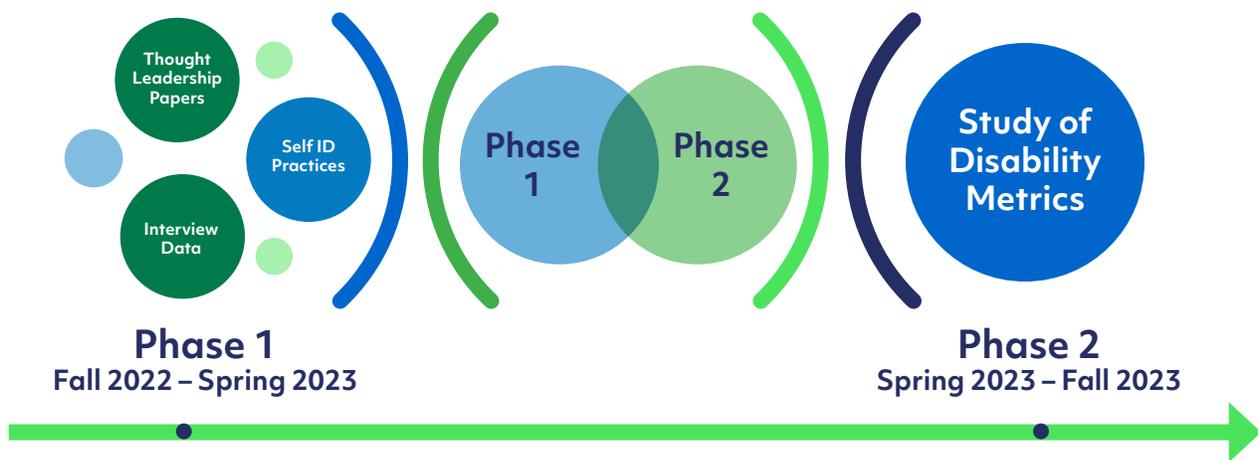- Accountability to measurable goals

Experiental

- Social experiential reality of disability
- Places onus on society and structures to foster inclusion

Research Design

This briefing presents findings generated by Phase 1 of Disability:IN's systematic study of voluntary self identification of disability practices in the workplace. Phase 1 took place over six months from September 2022 to February 2023. After an initial period of discovery with working groups of disabled corporate leaders and allies from companies that have participated in the Disability Equality Index, researchers designed a two-phase study to examine practices related to the **collection, promotion, and utilization of voluntary self identification** of disability data. Phase 1 analysis draws on three data sources: (1) public reports and peer-reviewed journal articles about workplace disability inclusion, (2) proprietary institutional documents that belong to Disability:IN, and (3) twelve 60-minute semi-structured interviews with U.S.-based leaders who oversee disability inclusion strategy at companies that reported above median self identification rates on the 2022 Disability Equality Index. Forecasted for March to July 2023, Phase 2 builds on the empirical and analytic findings of Phase 1 to examine contemporary disability measurement and reporting practices.


Thought Leadership Papers · Self ID Practices · Interview Data

Phase 1 · Phase 2

Study of Disability Metrics

Phase 1
Fall 2022 – Spring 2023

Phase 2
Spring 2023 – Fall 2023

Problem & Purpose:
Understanding Workforce Underrepresentation of People with Disabilities in the U.S.

People with disabilities face multiple exclusions from institutional and social life, including education and the workforce (World Bank, 2022a). In the United States, only 19.1% of working age people with a disability are employed in the labor force, compared with 63.7% of people without a disability (BLS, 2022). Of this, nearly one third are employed part-time. Thus, people with disabilities are much less likely to be employed than people without disabilities (BLS, 2022).

People with Disabilities 3x Less Likely to Be Employed

19.1%

Working-Age People with a Disability Employed

63.7%

Working-Age People without a Disability Employed
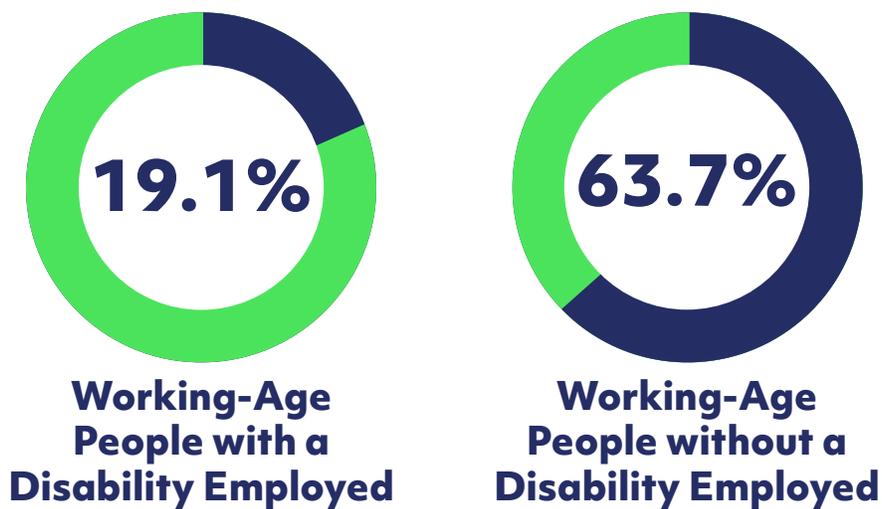
Within the working population of people with disabilities, only 4% self identify as having a disability to their employer (Disability:IN, 2022). For a variety of reasons, from historic stigmas and discriminatory hiring and promotion practices to fear of insurance eligibility, people with disabilities are reticent to voluntarily disclose their disability status to employers.

Thus, low levels of self identification fail to capture the full presence of people with disabilities already in the workforce, leading to another element of underrepresentation. Low employee turnout for voluntary self identification limits corporate reporting on disability.

# Layered Elements of Workforce Disability Underrepresentation

> **The underemployment of people with disabilities in the United States**
>
> > **Low levels of self identification among people with disabilities already in the workforce**
> >
> > > **Absence of disability data in annual diversity reporting**
> > >
> > > > **Underrepresentation of disability in the definition of diversity**

Of the 415 companies that participated in the 2022 Disability Equality Index, few publish their self identification data in their annual workforce diversity reports. This reality contributes to the underrepresentation of disability in the broader definition of diversity. While race, ethnicity, and gender identity are now commonly reported measures of workforce diversity, disability lags as an indicator of workforce diversity. However, at 15% of the population, people with disabilities remain the world's largest – and most often overlooked – underserved community.
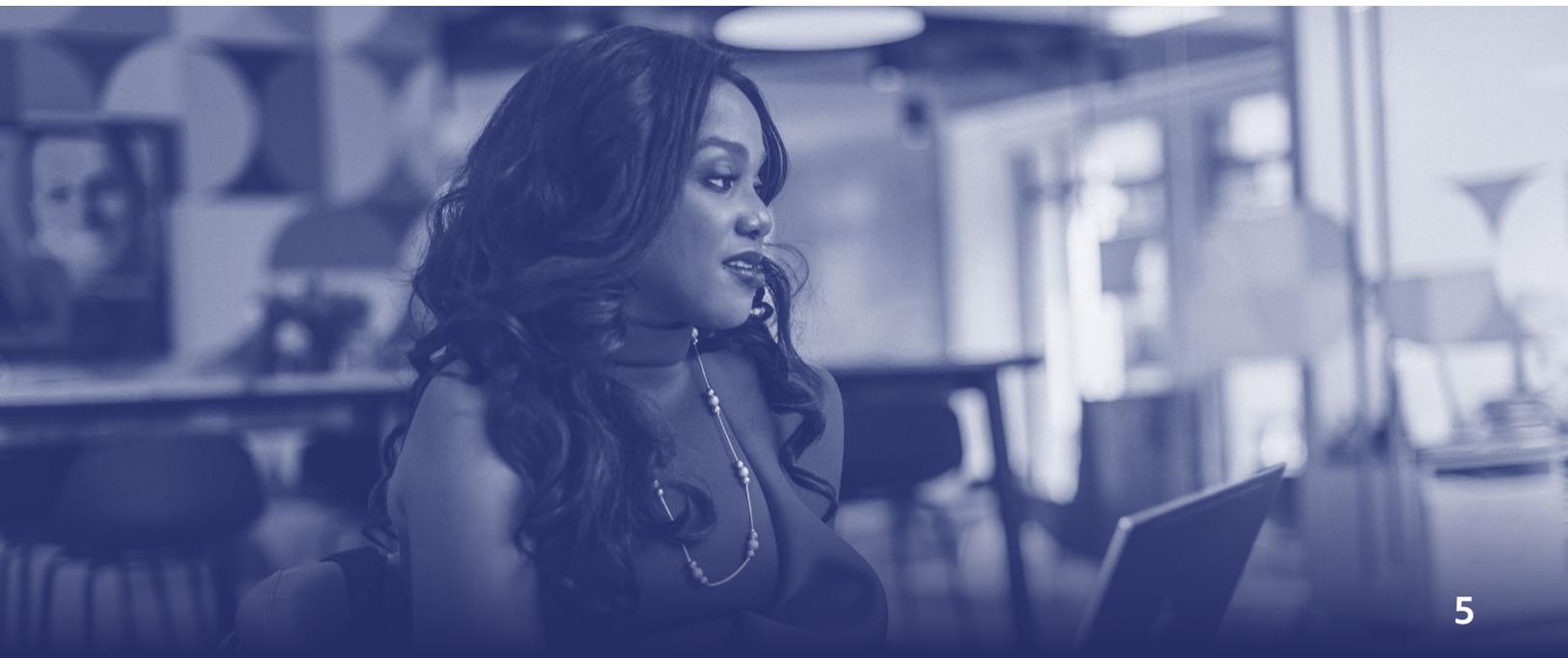
What is
Self Identification?

Self identification is a workforce data collection mechanism wherein companies invite their employees to voluntarily disclose personal demographic information, such as gender, race, ethnicity, veteran or disability status, and LGBTQ+. This briefing is concerned with the voluntary self identification of disability. In the U.S., companies that contract with the federal government are compelled to invite voluntary self identification of disability to ensure compliance with Section 503 of the 1973 Rehabilitation Act, which requires federal contractors to take affirmative action towards a 7% utilization goal across job groups. In addition, many companies who are not federal contractors choose to invite self identification in order to understand workforce demographics or to measure progress towards diversity and inclusion goals.

> **Disability self identification is an employee information mechanism by which an employee voluntarily chooses to identify as a person with a disability. Captured by a range of surveys, this data can inform internal and external programming, policymaking, and regulatory reporting.**

Self identification is an increasingly important employee engagement mechanism that enables companies to scrutinize and correct longstanding workforce imbalances that resulted from the last century of discriminatory employment practices that marginalized women, Black/African Americans, Hispanics/Latinx, Asians and Native Hawaiian/Pacific Islanders, people with disabilities, and LGBTQ+. Self-ID offers a window into workforce composition at a moment when longstanding binaries – gay or straight, Black or White, male or female – are being replaced by fluid constructs that capture the complexity of human identity that only an individual can *self* identify.

But as it stands, the disability self identification process is fraught with complex conceptual and logistical problems, starting with the reality that many people who qualify as disabled lack awareness of their status as well as of the benefits that legal and social safeguards that disability identity affords them. According to the 2022 Disability Equality Index, 4% of corporate employees voluntarily affirmed disability status. This offers a striking contrast to the global prevalence of disability, which is estimated at 15% of the population (World Bank, 2022). Widespread misunderstanding plus low voluntary self identification renders the data unreliable and unrepresentative of the workforce.

Against this backdrop, this research identifies the structures and systems that support self identification as the key to global disability inclusion strategy and argues that by disclosing disability data, both companies and individuals can benefit from a new era of inclusive corporate culture.

2022 Disability Equality Index Comparison Analysis Revealed

4%
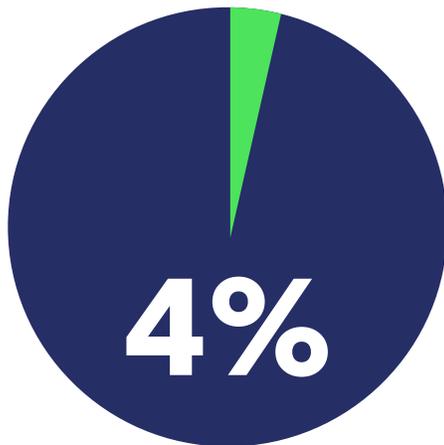
Corporate Employees Affirmed Disability Status

15%
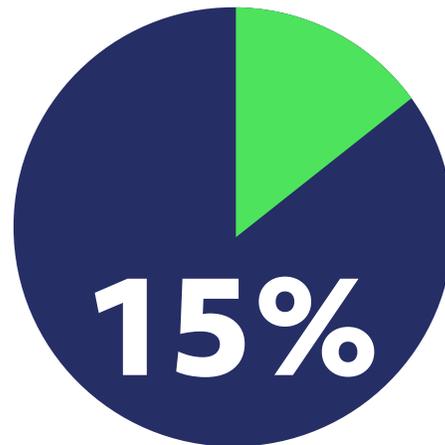
Global Prevalence of Disability

Empirical Findings: Characteristics of Effective Self Identification Strategies

Drawing on interview data, the findings presented in this section detail the characteristics of effective self identification strategies. Through iterative thematic analysis during the data collection phase, three overarching codes emerged – time, communication, and education. Timing concerns when companies see the greatest returns on outreach. Communication reviews how companies signal their commitment to disability inclusion, and education involves what content, definitions, and frameworks they promote to achieve inclusion.

Together, **well-timed outreach, multipronged communication, and workforce re/education** can curate a company culture that supports self identification with a trusting, informed, disability inclusive community. The charts below elaborate the elements of timing, communication, and education that drove increases in voluntary self identification at disability inclusive companies.

When: Well-Timed Outreach

"Always on" employee access to personal information in human capital management system, plus:

- Align with high-profile public disability recognition (e.g., Disability Employement Awareness Month, International Day of Persons with Disabilities, Global Accessibility Awareness Day)

- Prevent scheduling conflicts by working with communications to circumvent competing holidays, trainings, and announcements

- Avoid oversaturation by working with communications to increase focus and visibility of disability inclusion education outreach across platforms

- Separate self identification from benefits enrollment to avoid confusion that insurance coverage is linked to disability

- Treat trust as a function of time to realize statistically significant gains in self identification rates over a period of several years

How: Multipronged Communications

Multimodal
- Company-wide emails from senior leaders
- Intranet content
- Disability trainings
- HR newsletter articles
- Invitation to update employee profile in human capital management system
- Company-wide events

Multimedia
- "How to" infographics
- Disability influencer invited talks and performances
- Employee docuseries video content
- Public-facing storytelling blog

Distributed
- Emails from CEO, CDO, & CHRO
- Notifications from legal about data privacy and protection
- Employee/Business Resource Groups – disability E/BRG + other E/BRGs encourage network members to self identify

# What: Disability Re/Education

Education on...

- Company's public disability stance (Corporate Disclosure)
- Many ways of experiencing disability to promote awareness for the prevalence of disability
- How disability fits into Diversity & Inclusion Strategy
- Difference between self identification and self-disclosure
- Disability support services across the organization (benefits, self identification, policies)
- Accommodations process to increase visibility of self identification

A Blueprint to Foster Trust and Increase Self Identification:
Data-Driven Actions

This study's findings reveal effective practices that foster disability awareness, confidence, and inclusion across the organization, there-by gradually increasing employees' voluntary self identification of disability over a period of years. **Building on these findings, Disability:IN offers a blueprint to foster trust and increase self identification.**
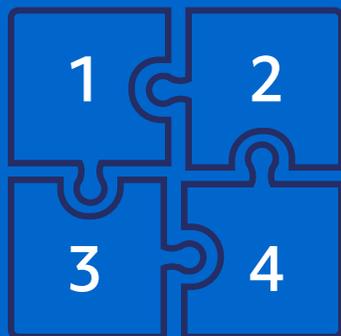
Together, four elements proffer a series of actions that companies can adopt to signify their commitment to social inclusion.

1. **Disability is less understood than other aspects of measurable diversity (e.g., race, ethnicity, gender identity) because many people considered disabled under medical and/or social definitions lack knowledge and awareness of their disability status.** This means there is a unique need for nuanced education for disabled and non-disabled employees to learn how disclosure and identification promote inclusion and reciprocity for all people.

There are lots of ways to define disability, and a lot of people do not realize that they are part of the disability community.

2. Disability measurement is caught between two paradigms - the dominant model built on compliance with externally imposed goals and the emerging model of disability as a facet of social experience. The former understands disability as a diagnostic medical construct, while the latter interprets disability as a facet of identity shaped by interactions with the structural and cultural environment. **Creating psychological safety for employees at work demands a new Empirical and Experiential Model of Disability that places the onus on structures and society to foster inclusion while embracing accountability to measurable goals. An Empirical and Experiential Model of Disability acknowledges the corporal reality of disability as well as the importance of social reality in defining disability.**

Disability lives in the body and the mind. Honor both in your outreach.

3. Multi-layered reciprocity between the company, its employees, and its investors is essential to overcoming the transactional nature of self identification. **Reciprocity starts with company-wide identification with disability inclusion, or "Corporate Disclosure." The most effective way to demonstrate corporate disclosure is by publicly reporting self identification data each year.** This sets the precedent for reciprocity between the company and the individual (who voluntarily shares personal information and benefits from inclusive culture) and the company and its investors (who reward companies for inclusiveness and benefit from financial and social gains).

Let everyone know that your company supports and employs people with disabilities. Make it public by telling your investors and employees about your disabled population each year.

4. For disability inclusion or self identification to mature from compliance to compliance *with* culture, **companies must become a significant site of professional re/education to counter the disability stigmatization and segregation that permeates society worldwide** (e.g., schooling, media). This means educating employees about the many ways of experiencing disability – as a condition or diagnosis as well as a felt experience of human identity – while integrating accessibility and disability into global Diversity, Equity, & Inclusion strategy to enable vibrant participation from the disabled community in the workforce. See Appendix 1 for the full spectrum of disability definitions and self identification questions.
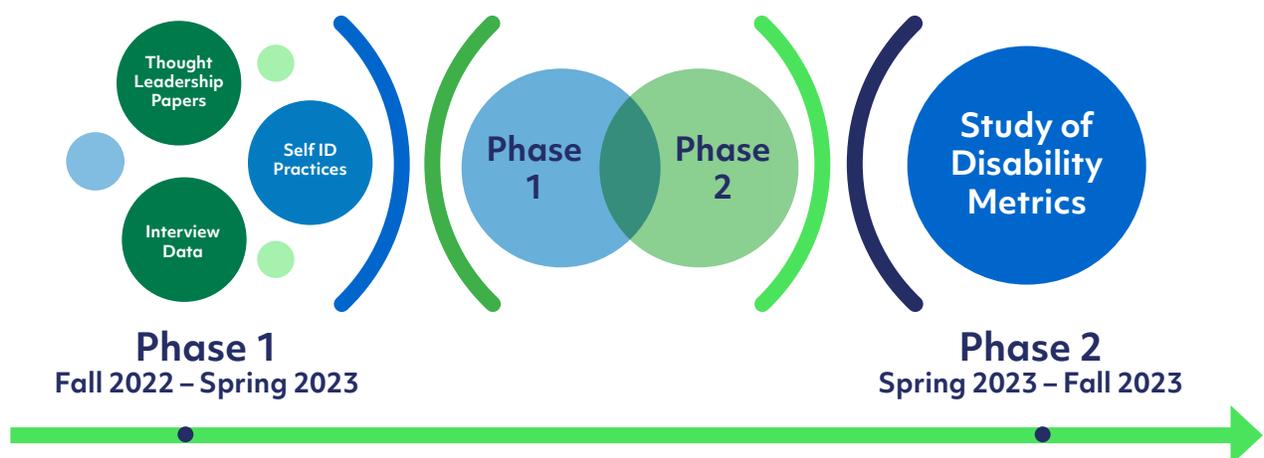
Companies can help people see disability differently by challenging stereotypes and sharing the strengths of talent with disabilities.

1 — Awareness of Disability

2 — Empirical & Experiential Model of Disability

3 — Corporate Disclosure through Public Reporting

4 — Corporate Re/education to Challenge Disability Stigma

Together, these four actions have the power to drive disability inclusive culture by reframing disability in the public imagination, taking decisive action towards disability measurement, and positioning the company to be a lever for inclusive social change. Further research is required to identify the best practices that support international self identification campaigns.

Implications That Drive Action:
Phase II Research

Phase II of Disability:IN's study of the collection, promotion, and utilization of voluntary self identification will develop actionable steps for corporate disclosure. Specifically, Phase II will emphasize the promotion and utilization of self identification data to (1) create a roadmap for Corporate Disclosure, (2) help prepare companies for changes to the 2024 Disability Equality Index, and (3) resource reciprocity between companies, employees, and investors by issuing guidance on disability reporting that is aligned with frameworks for "organizing data that incorporate other factors into investment analyses beyond financial performance" (CAQ, 2023).

Thought Leadership Papers

Self ID Practices

Interview Data

Phase 1

Phase 2

Study of Disability Metrics

Phase 1
Fall 2022 – Spring 2023
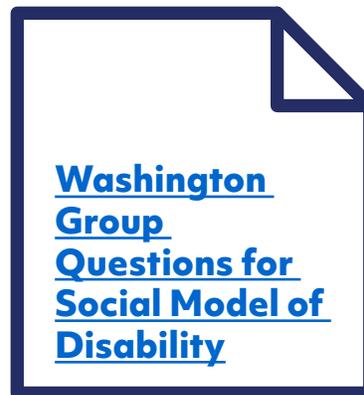
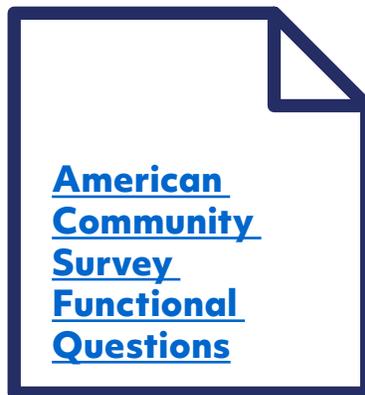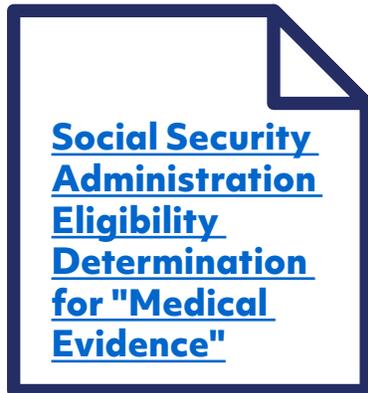**Phase 2**
Spring 2023 – Fall 2023

Appendix I:
The Spectrum of Disability Definitions

The table below demonstrates the range of domestic disability definitions organized along a spectrum from technical medical-oriented definitions to social identity-driven definitions of disability, as well as the leading supranational definition of disability.

Issuing Body	Social Security Administration (SSA)	Americans with Disabilities Act (ADA)	Centers for Disease Control (CDC)	U.S. Census American Community Survey (ACS)	Social Definition of Disability
Purpose of Definition	Legal – Benefits Administration	Legal – Protected Status	Medical	Functional Limitations	Rights
Definition Spectrum	**Medical Model of Disability**				**Social Model of Disability**
	Emphasis on individual's limitations				*Emphasis on society's limitations*
	To meet our definition of disability, you must **not be able** to engage in any substantial gainful activity (SGA) because of a **medically determinable** physical or mental **impairment**(s) that is either: · Expected to result in death · Has lasted or is expected to last for a continuous period of at least 12 months	The ADA defines a person with a disability as a person who has a physical or mental **impairment** that substantially **limits** one or major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability. The ADA also makes it unlawful to discriminate against a person based on that person's association with a person with a disability.	A disability is any condition of the body or mind (**impairment**) that makes it more difficult for the person with the condition to do certain activities (activity **limitation**) and interact with the world around them (**participation restrictions**).	ACS identifies serious **difficulty** with four basic areas of **functioning** – hearing, vision, cognition, and ambulation. These functional limitations are supplemented by questions about difficulties with selected activities from the Katz Activities of Daily Living (ADL) and Lawton Instrumental Activities of Daily Living (IADL) scales, namely difficulty bathing and dressing, and difficulty performing errands such as shopping. Overall, the ACS attempts to capture six aspects of disability: (hearing, vision, cognitive, ambulatory, self-care, and independent living); which can be used together to create an overall disability measure.	Disability is the "**disadvantage** or restriction of activity caused by a contemporary **social organization** which takes no or little account of people who have physical impairments and thus **excludes them from participation** in the mainstream of social activities" (Oliver, 1996, p. 22)

Self Identification Questions

Social Security Administration Eligibility Determination for "Medical Evidence"

U.S. Department of Labor Form CC-305 Voluntary Self identification of Disability

CDC Standard Disability Questions

American Community Survey Functional Questions

Washington Group Questions for Social Model of Disability

International Definition of Disability

"Disability is an evolving concept and that disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others."

– United Nations Convention on the Rights of Persons with Disabilities (UN CRPD)

Disability:IN is the leading nonprofit driving disability inclusion and equality in business worldwide. Our network of more than 400

publicly-traded corporations expands opportunities for people with disabilities across industries. Our organization and 25 local affiliates nationwide raise a collective voice of positive change for people with disabilities in business. We do this by:

- Promoting disability inclusion through heightening awareness; Advising corporations on and sharing proven strategies for including people with disabilities in the workplace, supply chain, and marketplace; and

- Expanding opportunities for people with disabilities by helping companies invigorate their disability initiatives, explore best practices, incorporate culture changes, and realize positive business outcomes.

References & Resources

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