

Steps For Success:

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


Onboarding and Completing Paperwork



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.



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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.

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.

Onboarding & Completing Paperwork

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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.



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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.



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- **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.



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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.
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- **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.



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