Report on Digital Accessibility

Abstract

Inaccessible hiring technologies and AI biases significantly impact the employment landscape for people with disabilities. Despite federal regulations mandating accessible hiring technology for large federal contractors, small businesses and startups—which comprise most U.S. employers—often lack the awareness and resources to implement the requirements included in such mandates.

This report underscores digital accessibility challenges, such as inadequately labeled web content, the absence of alternative text, the biases that AI can introduce in the hiring process, and the slow progress in making these technologies accessible.

It showcases successful policy initiatives that have led to accessible hiring technologies in the U.S., emphasizing the need for accessible recruiting software and inclusive AI processes. This report advises collecting best practices, raising awareness, and providing training on digital accessibility to employers. It also recommends that technology developers adhere to accessibility standards and that hiring organizations include accessibility criteria in their procurement processes.

Additionally, this report includes a comprehensive resources section for practitioners, providing valuable tools and information to help them navigate and implement accessibility in their hiring technologies.

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Executive Summary

While people with disabilities face many barriers in obtaining meaningful and gainful employment, inaccessible and biased hiring technologies often contribute to the challenges of entering the job market. The unavailability of accessible hiring technologies, particularly web-based job portals and applications, poses a significant barrier, often preventing these candidates from applying for jobs and thus excluding them from consideration.

Moreover, AI used in hiring systems not only lacks accessibility but also perpetuates systemic biases against people with disabilities, resulting in continued workforce exclusion. While federal regulations mandate large federal contractors implement accessible hiring technology, small businesses, and startups lack the awareness and education necessary to adopt accessible digital practices.

According to the World Economic Forum, Small and medium-sized enterprises (SMEs) or small and medium-sized businesses (SMBs) comprise up to 70% of jobs globally but struggle with digital adaptation. With support from the technology industry and NGOs, SMEs can embrace digital accessibility to enhance their hiring processes and thrive in the digital era. (Source)

This report will examine the challenges organizations face in making hiring technologies accessible to people with disabilities and explore opportunities for NOD to collaborate with partners and the disability community to help organizations improve in this area.

Findings

Literature Review

Individuals with disabilities cannot be considered for jobs if they simply cannot access job postings or application systems. They encounter significant technological barriers and biases when they search for and apply for jobs. Large-scale developers of hiring technologies tend to overlook accessibility, forcing employers to create accessible platforms through internal IT staff or third-party vendors. This has increased jobs within the accessibility sector but rarely results in new, universally accessible hiring technologies. The rapid integration of AI into hiring systems exacerbates the issue by potentially amplifying inaccessibility and introducing bias without careful thought around equity and accessibility.

The private sector has not fully utilized the limited general-use accessible hiring technologies available, often due to cost, prioritization, and awareness issues. According to the National Disability Organization's (NOD) Disability Inclusion Blueprint (formerly the Employment Tracker) data, only 70% of companies surveyed consider disability accessibility a requirement when selecting a new workplace technology, and only 51% have a digital accessibility policy requiring such consideration.

Legislation mandating accessible hiring technologies has only shown success where US federal contractors (mainly large enterprise organizations) have developed accessible hiring systems to comply with national law.

Companies have not prioritized the procurement of accessible hiring technologies. NOD's Disability Inclusion Blueprint shows that only 52% of companies surveyed require vendors to follow accessibility practices as part of the contracting process. Only 12% of companies require vendors to provide Voluntary Product Accessibility Templates. This is an area where improvement could lead to a substantial positive impact if companies better prioritized digital accessibility.

The fifth State of Digital Accessibility Report by Level Access shows that 72% of organizations have a digital accessibility policy, while 28% do not. Additionally, 75% of respondents indicate that their organizations aim to improve digital accessibility but face too many competing demands, and 69% cite insufficient time to address these issues. SMEs often struggle with digital accessibility due to resource constraints and challenges with technology adoptions. However, if organizations can overcome these challenges and leverage digital accessibility as a human resource and talent management tool, then they can significantly boost employment opportunities for people with disabilities and enhance productivity and success for all workers.

Survey Highlights

To assess accessibility challenges in employment technologies, five surveys were created to gather perspectives from key stakeholders: jobseekers and employees with disabilities, employers who develop or purchase employment technologies, accessibility vendors, Human Resource technology vendors, and government agencies and NGOs focused on accessibility and employment.

Survey responses mirror findings from the literature review and highlight significant

Findings

accessibility challenges within human resources technologies. Employees report that job application portals often lack compatibility with assistive technologies, including insufficient tab-only access and improper captioning during video interviews. A respondent highlighted that most Applicant Tracking Systems (ATS) are inaccessible to people with disabilities due to poor design and inaccessible tools. They noted that many ATS use overlays, creating additional barriers, and despite digital accessibility standards existing, most companies are not obliged to comply with them.

Aside from one Human Resources technology vendor that reported they take accessibility into account when they incorporate AI, it was noted that most AI interview platforms usually fail to integrate with screen readers, making applications and interviews stressful and time-consuming, if not impossible. Additionally, resume screening tools might be "ableist" as they are trained on public data that does not include people with disabilities and exclude resumes due to disability-specific language. While human resources technology providers acknowledge ongoing efforts to enhance accessibility, they face challenges like limited resources, competing priorities, and a lack of in-house expertise and leadership support. Even larger and better resourced vendors acknowledge that it is challenging to 1) keep up to speed on accessibility when it comes to the development of feature enhancements, 2) fill gaps in coverage when it comes to test automation, and

3) to collect enough user feedback even when there is a dedicated channel and specialized customer service disability help desk. Despite some adjustments, comprehensive training programs and dedicated resources are still lacking except at a handful of highly resourced companies, leading to ad hoc training on best practices. Accessibility consultants observe common issues like unlabeled forms and various violations of the Web Content Accessibility Guidelines (WCAG). They recommend hiring professionals to ensure all materials meet WCAG 2.1 A/AA standards, using multiple platforms for announcements, being prepared to handle accommodation requests, and providing training for inclusive interviewing.

Survey results highlight key practices for organizations developing and using hiring technologies:

- Ensure that cross organizational leaders are engaged in accessibility and digital accessibility, for example IT leadership should make human resources leadership aware of accessibility standards for digital technologies.
- Engage with non-profits that monitor trends and provide professional guidance along with disability rights organizations and associations where accessibility professionals gather and share knowledge.
- Ensure that people with disabilities are part of policy, procedure, and the development, procurement, and testing of information and communication technologies (ICT).

Key Recommendations

Organizations can improve hiring rates for people with disabilities by ensuring their recruiting software (particularly online job descriptions, application platforms, and AI processes) is accessible and inclusive.

- Developers of hiring technologies should adhere to standard accessibility requirements like WCAG 2.2 AA and EN 301 549, and those technologies should pass usability tests, especially in assistive technology scenarios.
- Hiring entities should include accessibility criteria when procuring hiring technologies and require vendors to prove compliance with standards like WCAG 2.2 AA and EN 301 549.
- There should be efforts to share best practices from companies that have implemented accessible hiring technologies and those that have created such solutions internally.
- Efforts should be made to raise awareness and provide training on digital accessibility among small businesses and entrepreneurs.

Targeted Pilot Proposals

This section outlines potential solutions to eliminate employment barriers caused by inaccessible hiring technologies. These actionable solutions can be implemented in a pilot phase, emphasizing collaboration between NOD and organizations specializing in this field.

Idea 1: Procurement of Accessible Hiring Technologies

This pilot will analyze best practices from both the public and private sectors for integrating accessibility as a critical criterion in hiring technology procurement and offer resources to help companies incorporate accessibility more effectively into their policies and practices.

Objectives:
- Gather and synthesize the best accessibility procurement practices and resources from DisabilityIn, The Partnership on Employment & Accessible Technology (PEAT), and government entities and make them accessible on NOD's website.
- Invite partners and consultants to deliver free online seminars on procuring accessible hiring technologies, such as how to read a Voluntary Product Accessibility Template (VPAT), and archive these on NOD's resource page.
- Develop and distribute procurement and accessibility educational materials tailored for small businesses.

Idea 2: Pilot Reduction of Negative AI Impact

Assess whether companies have AI fairness standards that include accessibility considerations. To educate those companies that don't, explore utilizing the Center for Democracy's Civil Rights Standards for 21st Century Employment Selection Procedures and the AI and Inclusive Hiring Framework for AI bias against individuals with disabilities.

Idea 3: Campaign to Enhance Accessibility of Major Hiring Technologies

Facilitate a roundtable with leading hiring technology providers like ADP and large corporations such as MSFT and IBM to discuss ways to prioritize accessibility and share best practices. Create a messaging campaign and evangelize the case for increased accessibility in hiring technologies.

Key Recommendations

Idea 4: Campaign for More Digital Accessibility Policies

Increase the number of companies with digital accessibility policies through targeted campaigns, mainly aimed at the significant percentage of organizations currently lacking such policies, such as many small businesses. Offer a model policy to support uptake.

Idea 5: Digital Accessibility Education Program for Small Businesses

In collaboration with its partners, NOD can create a training initiative for small businesses and entrepreneurs to advance digital accessibility. This program will be available on NOD's resources site and initially tested with small companies for input. The hypothesis is that this will boost the employment of people with disabilities and enhance their accessibility to products and services.

Example Training Subject Matter (see complete curricula in Appendix C)

- Introduction to Digital Accessibility, Appropriate Communication, and Assistive Technologies
- The Accessibility Regulatory and Standards Landscape
- Digital Accessibility in Action, Strategies for Web and Document Accessibility
- Procuring Accessible Technology

Additional Opportunities for NOD

The subsequent activities are potential initiatives that NOD could undertake, along with the pilot projects, to enhance support for its members and partners.

1. **Identify Organizations:** Enhance the NOD survey initiative to pinpoint companies requiring assistance implementing digital accessibility policies.
2. **Awareness Campaigns:** Launch initiatives to educate businesses, especially SMEs, on the importance of digital accessibility and its benefits for hiring and retaining people with disabilities. This could include workshops, webinars, and educational materials.
3. **Technical Assistance:** Provide technical support and expertise to educate organizations on digital accessibility, formulate policies, acquire accessible technologies, and manage the implementation of standards and guidelines.
4. **ROI Demonstration:** Present case studies highlighting the long-term advantages and potential return on investment of digital accessibility initiatives, such as hiring people with disabilities, avoiding accessibility lawsuits, and resolving consumer complaints.
5. **Monitor and Improve:** Assist organizations in revising their accessibility policies to align with current standards, ensuring they succeed in the digital age.

Filling these gaps and seizing these opportunities can make NOD essential in advancing digital accessibility and creating a more inclusive digital environment.

Conclusion

Further engagement with hiring technology creators, consumers with disabilities, and employers will bolster the creation and use of more accessible hiring technologies, leading to more inclusive employment environments. By leveraging existing resources and best practices, NOD, in partnership with industry experts, can support the adoption of digital accessibility solutions for hiring technologies. This strategic collaboration is crucial for advancing NOD's goals and promoting inclusivity, especially in smaller organizations with historically lower capacity and capability.

Appendix A: Literature Review

Introduction

The literature review examines how accessible digital recruiting and hiring technologies impact people with disabilities. It covers barriers to accessibility, how AI affects fairness, and the ability of small and medium enterprises to adopt accessible tools. Additionally, it discusses the benefits for businesses that improve accessibility. The review is divided into sections: Definitions, Barriers, Impact, and Success Stories.

Accessibility of Recruiting/Hiring Technologies

Definitions

Recruiting/Hiring technologies are tools and solutions used to streamline and enhance the hiring process for employers.

The Employer Assistance and Resource Network on Disability Inclusion offers a broad range of hiring/recruiting technologies, including:

- Web-based intranet and internet information and applications
- Email and other electronic correspondence
- Software applications and operating systems
- Telecommunications products
- Video and multimedia products
- Online job applications

([Source](#))

More specific examples of the general hiring technology categories can be found in the Equal Employment Opportunity Commission's definition of hiring/recruiting technologies:

- Resume scanners that prioritize applications using specific keywords

- "Virtual Assistants" or "Chatbots" that ask job candidates about their qualifications and reject those who do not meet pre-defined requirements
- Video interviewing software that evaluates candidates based on their facial expressions and speech patterns
- Testing software that provides "job fit" scores for applicants or employees regarding their personalities, aptitudes, cognitive skills, or perceived "cultural fit" based on their performance on a game or a more traditional test.

([Source](#))

These technologies are often combined in **Applicant Tracking Systems (ATS)**, which help manage the application process by automating resume selection, prescreening questions, background checks, and interview scheduling. ([Source](#))

Accessible technology is technology that can be used by people with a wide range of abilities and disabilities, either directly or through assistive technology. ([Source](#))

Barriers to hiring technologies

Barrier One: Online Navigation
Websites and applications that do not meet accessibility standards make it difficult for people with disabilities to navigate and receive information. In a comprehensive 2024 study of the top one million websites, WebAIM reconfirmed a troubling statistic for the sixth year: 95.9% of home pages had detected WCAG 2 failures. Top issues included:

- Low contrast text
- Missing alternative text for images
- Missing form input labels
- Empty links
- Empty buttons
- Missing document language

([Source](#))

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These issues are generic to the internet and specific to hiring/recruiting web pages. Common accessibility examples from The Partnership on Employment & Accessible Technology (PEAT) include:

- Complex web navigation that is not intuitive
- Timeouts that cause an application to close before the user can save it.
- Lack of video captioning.
- Lack of alternative text, which can make images hard to recognize.
- Poor screen/color contrast.
- Inaccessible form fields and mouse-only input options.

([Source](#))

Barrier Two: Completing Online Job Applications

Complex and inaccessible digital job application forms make it difficult for candidates to locate and fill out job applications.

In a 2024 study by the American Foundation for the Blind and Mississippi State University, three blind, experienced screen reader users attempted to complete online job applications from 30 randomly selected Fortune 500 companies. They found that 23 of the 30 (76.7%) sites had critical issues that prevented at least one tester from completing the application, with testers finding 694 accessibility issues. ([Source](#))

Barrier Three: Applicant to Employer Communications

Websites and digital interview platforms that don't support features like text-to-speech, alternative text, or captioned speech can impede a candidate's chances of understanding and being understood.

Non-platform-specific issues like lag time and internet connectivity can present higher barriers for candidates with visual, hearing, and cognitive disabilities. ([Source](#))

Barrier Four: Nonexistent or Incomplete Accessibility Programs

In 2023, NOD surveyed 145 HR/DEI practitioners for employers who are federal contractors—and thus legally obligated to ensure their hiring/recruiting technologies are accessible. Only *half* (51%) replied *Yes* to the question *Does your company have a digital accessibility policy?* Over one in four (29%) employers confirmed that they had no policy, and one in five (20%)

Even when companies provide accessibility features, they are often insufficient. Testers from the AFB survey above noted that several companies included features specifically for screen readers, like screen reader-only text or instructions. Unfortunately, about a third of these attempts to improve accessibility made the experience *worse*. ([Source](#))

This experience is confirmed by PEAT, which studied over 400 people with visual, hearing, physical/motor, and cognitive disabilities. Over half (58%) of applicants who used employer-provided "assistance" were unable to complete the application, over six times the rate of the average in the study (9%). ([Source](#))

Impact

Inequitable access

In the PEAT survey referenced above, nearly one-half (46%) rated their experience applying for jobs as "difficult to impossible." ([Source](#))

The NFB determined that only 50 of the 90 attempts to complete an online job application were successful (55.6%). ([Source](#))

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The US Equal Employment Opportunity Commission (EEOC) has received complaints from individuals with disabilities regarding inaccessible application processes, indicating that this is a recognized barrier to employment.

Inequitable rates of unemployment and underemployment
According to the Bureau of Labor Statistics most recent report:

Unemployment rates were much higher for people with a disability than for those with no disability *across all educational attainment groups*.

- Workers with a disability were nearly twice as likely to work part-time as workers with no disability.
- Workers with a disability were more likely to be self-employed than those with no disability.

([Source](#))

It's easy to see the reason for this. Research indicates hiring managers are significantly less likely to select candidates who openly disclose their disability than those who do not ([Source](#)). It is unacceptable for these candidates to encounter institutional ableism via digital inaccessibility even before they apply.

Success Stories

There is cause for optimism. The Bureau of Labor Statistics additionally noted that the unemployment rate among people with disabilities is the lowest since tracking began in 2008. One contributing factor is the rise of fully digital workplaces, which have removed many physical barriers to employment. Although much progress is still needed, the digital workplace era has brought about new products, organizations, and advancements in digital accessibility. These include:

New Accessibility-Focused Job Boards
New Accessibility-Focused Job Boards include *AbilityLinks*, an online job board and resume bank that connects job seekers with disabilities to inclusive employers, offering accessible features to ensure equal access to job opportunities ([Source](#)). Similarly, *AbilityJobs* is explicitly designed for people with disabilities, providing employers with tools to make their job postings accessible and offering a platform where candidates can find jobs suited to their needs ([Source](#)). *The Workplace Initiative* provides features such as job posting accessibility checks and applicant tracking systems designed with accessibility in mind ([Source](#)).

New Accessibility-Focused Interviewing Platforms
HireVue offers video interviewing software with accessibility features such as closed captioning and compatibility with screen readers, making it easier for candidates with hearing or visual impairments to participate in interviews. ([Source](#))

New Accessibility-Focused Recruiting Software
Inclusively focuses on connecting employers with job seekers with disabilities, using proprietary technology to match candidates to jobs that fit their skills and workplace accommodations. ([Source](#)) *Textio*, while not exclusively for disability access, helps employers create more inclusive job descriptions by analyzing language that might be unintentionally biased or non-inclusive. ([Source](#))

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Employers themselves are making strides to adopt best practices, work with some of the organizations listed above, or even create their own accessible hiring technologies, including *Microsoft*, *Salesforce*, and *Bank of America*.

Large enterprise companies have sometimes taken these positive steps in response to US federal requirements for organizations contracting with the US government. Under Section 503 of the Rehabilitation Act, federal contractors and subcontractors—those who do business with the federal government—are prohibited from discriminating in employment against individuals with disabilities. ([Source](#))

Several US States, such as Colorado, have also created regulations that require digital accessibility of technology and content, including online job applications and hiring technologies. ([Source](#))

While purchasing accessible hiring technologies may not be legally required in all situations, PEAT advises employers to consider whether technology vendors meet common accessibility standards when purchasing or developing technology so all job seekers can access hiring technologies. ([Source](#))

Use of AI in Hiring and Recruiting Software

Definitions

Generative Artificial Intelligence (Large Language Models)
Generative AI creates new content from its training data. Large Language Models (LLMs), a type of generative AI, use deep learning to produce human-like text and handle tasks like translation, question answering, and content creation.

The use of AI in hiring technologies among US companies is significant:

- 24% of companies use AI to hire employees. ([Source](#))
- The range of companies using AI in recruitment is estimated to be between 35% to 45%. ([Source](#))
- As of 2024, 30% of organizations screen applicants with algorithms as part of the hiring process. ([Source](#))

The rise in AI-driven hiring tools has erected barriers for individuals with disabilities. Biased or non-inclusive algorithms systematically exclude qualified candidates, while those who could thrive with reasonable accommodations are often filtered out prematurely. ([Source](#))

Barriers

Barrier One: Bias in AI Models and Tools
AI algorithms may inadvertently perpetuate biases if they are trained on historical data that does not adequately represent people with disabilities.

Barrier Two: Explicit Disability Bias
A study by Kate Glazko at the University of Washington revealed that ChatGPT's GPT-4 model exhibited bias when ranking resumes, favoring those without disability-related honors over identical ones with such credentials. ([Source](#))

Barrier Three: Inconsistent Mitigation Results
The University of Washington study also found that the AI model's explanations reinforced stereotypes. Attempts to reduce bias by adjusting the AI had some success, but the outcomes varied. This

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research highlights the critical necessity to continue exploring and addressing AI biases to guarantee user fairness. (Source)

Impact

Disability bias in AI-based resume screening can have significant impacts on people with disabilities:

1. **Fewer Job Opportunities:** Bias may wrongly reject qualified candidates, reducing job prospects.
2. **Stereotype Reinforcement:** AI mirrors societal biases and can reinforce negative stereotypes about disabilities.
3. **Heightened Discrimination:** Biased processes foster widespread discrimination and disadvantage people with disabilities.
4. **Mental Health Impact:** Repeated bias and rejection can harm the mental health and self-esteem of individuals with disabilities.

It's vital to tackle these biases to promote fair and inclusive hiring practices. (Source)

Success Stories

AI, when unbiased, can significantly improve inclusive hiring for individuals with disabilities by matching them to appropriate roles, thereby breaking down employment barriers. (Source)

Taryn Williams, Assistant Secretary for Disability Employment Policy, highlights the importance of collaborating with cross-sector partners to leverage AI and develop a robust risk management framework for automated hiring tools (Source). Two resources from PEAT, the (AI & Disability Inclusion Toolkit and Disability-Led Innovation Report) show that organizations can mitigate AI's

risks and attract skilled candidates from underrepresented groups. (Source)

PEAT's new AI & Inclusive Hiring Framework suggests that organizations consider asking themselves about fairness before purchasing a vendor's hiring technology. Two of those questions, for example, are:

- Do you know whether there are accessible alternatives for biometric, emotional, or behavioral analytics features that may require more careful consideration, training, or validation?
- Do you know whether generative AI (GenAI) features are included in the technology? Refer to the NIST AI RMF GenAI Profile, Govern 6.1 Actions.

(Source)

Capability and Capacity of Small Businesses

Definitions

SMEs (Small and medium-sized enterprises) have revenues, assets, or several employees below a certain threshold. (Source)

Barriers

Barrier One: Limited financial, human, and digital resources
SMEs (Small and Medium-sized Enterprises) contribute up to 70% to employment and GDP in the global economy. However, 67% of SMEs struggle to survive due to intense business pressures and limited resources, which hinder their technology adoption. In addition to limited financial and human resources, SMEs have inadequate

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infrastructure and data management issues. Approximately 64% find it challenging to use their data effectively. ([Source](#))

Barrier Two: Lack of awareness and experience with digital accessibility
Small businesses are crucial for economic growth but face challenges in adopting digital tools. Digital tools have been essential for small businesses, especially during economic uncertainties. They help improve efficiency, save costs, and enhance business resilience ([Source](#)). For instance, 75% of small business leaders in the U.S. reported using digital tools to navigate challenging economic conditions. ([Source](#))

Barrier Three: Cost and availability of tools and training
Small businesses that have not purchased or designed accessible websites and hiring tools may face costly redesigns or risk lawsuits, potentially driving some offline.

Impact

If SMEs lack the financial and human resources for accessibility, including accessible hiring technologies, people with disabilities are less likely to apply or work there successfully.

Success Stories

With increased awareness and education, small businesses can successfully implement digital accessibility of their external-facing content, such as hiring tools, and reap the benefits of increased user engagement, customer satisfaction, and overall better experiences, including for job candidates. ([Source](#))

Small businesses were four times more likely than large businesses to report the benefit of hiring people with disabilities. A national survey found that 87% of customers stated they are more likely to shop at companies where people with disabilities are employed. ([Source](#))

Level Access's 2023-2024 The State of Digital Accessibility Report recognizes that small businesses are increasingly moving from being aware of digital accessibility to actively integrating it into their operations. ([Source](#))

Two small business examples:

1. Barkley: A small marketing agency that integrated accessibility into its digital marketing strategies. According to Daily.dev, Barkley not only improved their clients' website accessibility but also enhanced their overall brand reputation. Barkley's approach includes:
   - **Conducting accessibility audits** to identify areas for improvement.
   - **Implementing accessibility features** like screen reader compatibility, keyboard navigation, and color contrast adjustments.
   - **Providing training and resources** to their clients to help them maintain accessibility standards. ([Source](#))
2. Legal & General Group: As reported in Daily.dev, Legal & General Group financial services company updated their website to improve accessibility, resulting in a 25-50% increase in site visits. ([Source](#))

The State of Digital Accessibility Report also recommends that small businesses integrate digital accessibility into the software or product development life cycle from the start instead of depending on retrofit solutions. They suggest implementing a centralized program to coordinate processes, training, and tools to ensure accessibility is consistently integrated across all projects, leading to successful outcomes. ([Source](#))

Appendix B: Resources for Practitioners

Below is a comprehensive review of the available literature for practitioners seeking to improve their processes.

Improving Applications

- AI & Disability Inclusion Toolkit
- How to Make Your Job Application Process More Accessible | Built In
- Online job applications should be "more accessible and inclusive" | theHRD (thehrdirector.com)
- How Job Application Norms Discriminate Against Disabled People — SIC (sicofficial.co.uk)
- Making Web-Based Job Application Forms Accessible to All Users | ADANW (nwadacenter.org)

Improving Online Hiring/ Recruitment Processes

- Creating A More Accessible And Inclusive Workplace For People With Disabilities (forbes.com)
- How to Make Your Hiring Process More Inclusive to People With Visual Impairments | Built-In
- Tips for Inclusive and Accessible Hiring and Recruiting | Deque
- Accessible Online Job Recruitment Must Be a Priority, Now and Always – Rooted in Rights
- Inclusive Design: Ensure that all digital platforms, including websites and job application systems, are designed with accessibility in mind12.
- Inclusive employment: how to ensure that online job applications and recruitment systems are accessible to all | ITU Academy
- Guidebook on accessibility of online job application and recruitment systems - ITU 2022

Procuring Accessible Hiring Technologies

- DisabilityIN Accessible Procurement Toolkit
- Buy IT!—Your Guide for Purchasing Accessible Technology - Peatworks
- Asking the Right Questions for Procuring Accessible Technology - EDUCAUSE
- VPAT (Voluntary Product Accessibility Template) - Information Technology Industry Council

Educational programs and resources available for small businesses to learn about ADA (Americans with Disabilities Act) and accessibility:

- ADA Update: A Primer for Small Business - This guide from the Department of Justice provides comprehensive information on ADA regulations and how they apply to small businesses. It includes the 2010 Standards for Accessible Design and offers guidance on ensuring compliance.
- ADA National Network - Offers free webinars on various topics related to accessibility, including the built environment, information and communication technologies, and transportation.
- ADA.gov Resources - The ADA.gov website provides a range of guidance and resource materials to help small businesses understand and comply with ADA requirements.
- Technical Assistance Programs - The Department of Justice offers free consultations on ADA compliance for small businesses.
- Accessibility Grants and Funding Options—Various grants and funding options are available to help small businesses improve their accessibility.

Appendix C: Sample Training Program

Training for small businesses and entrepreneurs:

- Introduction to Digital Accessibility
  - People with disabilities (broad continuum of types)
  - Appropriate Communication (etiquette and language)
  - How people use accessible and assistive technology (on the job, to gain access to govt services, as consumers of goods and services)
    - Common examples include a screen reader reading a website, captions, and transcripts within conferencing platforms.
- The Regulatory and standards landscape (as relevant to small businesses)
  - Potential obligations under US federal and state laws (as they relate to small businesses such as employers, manufacturers, service providers, and retailers)
  - Common accessibility standards used to measure compliance and conformance
  - Risks and opportunities of meeting requirements
- Digital accessibility in action
  - Web Accessibility (strategies for testing, standard tools, and resources)
  - Document Accessibility (strategies for testing, standard tools, and resources)
- Procuring accessible digital technology
  - Adding accessibility criteria to purchasing requirements
  - Comparing VPATs/ACRs
  - How to talk to vendors
  - Meeting business and accessibility needs

Appendix D: Survey Methodology

An additional input to the report is insight gathered from survey responses of various relevant stakeholders, including:

- Government agencies and NGOs with relevant focus on employment and accessibility
- HR technology professionals
- Accessible technology professionals
- Employers of people with disabilities
- Jobseekers and employees with disabilities

Stakeholder feedback reveals some of the challenges and opportunities in removing barriers and making digital hiring technologies accessible, especially where there are interdependencies such as interoperability between technologies and when third-party vendors are involved.

Survey Methodology

NOD personnel and the project consultant developed relevant questions to capture a wide range of perspectives from each stakeholder group to better understand their experiences with digital accessibility for hiring technologies. Multiple sessions were used to refine the questions and ensure they were clear and would elicit insights where the literature review was limited.

The surveys were created using Google Forms and emailed to selected individuals to collect qualitative data to complement the report's literature review. Participants were carefully selected to represent a balanced cross-section of stakeholders, ensuring diverse insights from selected sectors and roles. Select responses are included in the Survey Highlights section of the report. Identifiable respondent data is not included in the report.

Survey Questionnaires:

These are the questions for each of the respective stakeholder surveys:

Government and Non-Government Organizations focused on employment and accessibility

1. What specific regulations or guidelines are currently in place to ensure the accessibility of hiring technologies for people with disabilities?
2. How do you monitor and/or enforce conformance with accessibility standards in hiring technologies?
3. What steps are being taken to update or improve accessibility regulations and support resources for hiring technologies as new technologies, such as AI, are introduced?
4. Are there any upcoming changes or proposed legislation related to the accessibility of hiring technologies that organizations should be aware of?
5. How can organizations and vendors stay informed about the latest accessibility requirements and best practices for hiring technologies?
6. What resources or support does your organization provide to help organizations conform with accessibility regulations for hiring technologies?
7. How do you collaborate with industry experts, advocacy groups, and other stakeholders to develop and refine accessibility standards for hiring technologies?
8. What are the most common accessibility issues you have identified in hiring technologies, and how are they being addressed?

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9. How do you ensure that the voices and experiences of people with disabilities are considered in the development and enforcement of accessibility regulations for hiring technologies?
10. What role do you see government entities and NGOs playing in promoting innovation and best practices in the accessibility of hiring technologies?
11. What future trends or advancements in accessibility solutions do you foresee impacting the hiring process for people with disabilities?

Human Resources Technology Vendors

1. Do you strive to meet common accessibility standards such as WCAG 2.1?
2. Does your platform accommodate users with various disabilities (e.g., visual, auditory, cognitive, motor)?
3. What steps have you taken to make your user interface accessible to screen readers and confirm that all interactive elements (buttons, forms, etc.) are accessible via keyboard navigation?
4. Do you conduct regular accessibility audits? If so, how often?
5. How do you collect and incorporate feedback from users with disabilities into your product development cycle?
6. What kind of training do you provide to your team on accessibility best practices?
7. Do you offer customer support specifically for users with disabilities? If so, what does that support look like?
8. Do you have a specific feedback mechanism for accessibility issues experienced by users with disabilities

within your platform? If so, what does that mechanism entail? (Select all that apply)
9. Do you provide accessibility documentation or guides for users and administrators?
10. Are there any third-party tools or resources you recommend for enhancing accessibility on your platform? If so, please explain.
11. What are the biggest challenges you face in making hiring technologies/platforms accessible?
12. Do you find it difficult to stay updated with the latest accessibility standards and best practices?
13. Do you take steps to ensure that AI incorporated into your hiring technologies/platforms does not create negative impact on users with disabilities?

Accessibility Technology Vendors

1. How frequently do you interact with hiring technologies on behalf of your customers?
2. How accessible are most of your clients' hiring technologies for people with disabilities?
3. What are the most common accessibility issues you encounter with hiring technologies? Please provide specific examples.
4. Are you concerned about the impact of AI on the hiring of people with disabilities? If yes, please explain your concerns.
5. What challenges have you faced while implementing or working with AI in your clients' hiring technologies, particularly regarding accessibility? Please describe any specific issues or obstacles.

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6. Do you believe that your clients have adequate training to understand and support the needs of job seekers with disabilities?
7. What best practices do you recommend to your clients to improve the accessibility of their hiring technologies?
8. What future trends or advancements in accessibility solutions do you foresee impacting the hiring process for people with disabilities?

Employers

1. Please select your profession below.
2. How do hiring technologies play a role in your organization's hiring process? Please provide specific examples.
3. Are you familiar with the accessibility features available in the hiring technologies your organization uses?
4. Do you have a specific feedback mechanism for accessibility issues experienced by users with disabilities within your hiring process? If so, what does that mechanism entail? (Select all that apply)
5. Have you received feedback from job seekers regarding the accessibility for people with disabilities of your hiring technologies?
6. If yes, what is the most common feedback you have received about the accessibility of your hiring technologies?
7. Has your organization incorporated AI into one or more of your hiring processes? If yes, please select all processes that apply.
8. What challenges has your organization encountered while implementing AI in your hiring processes, particularly regarding accessibility? Please describe any specific issues or obstacles.
9. If you have worked for a small- or medium-sized organization (<1,000 employees), have you encountered specific challenges in addressing digital accessibility? (Select all that apply)
10. Have you collaborated with other departments to enhance the accessibility features of your hiring technologies?
11. Have you collaborated with any organizations or experts to enhance the accessibility features of your hiring technologies? If so, please describe the collaboration.
12. Do you feel like you have access to the right resources and training to understand and support the needs of job seekers with disabilities?
13. What future trends or advancements in accessibility solutions do you foresee impacting the hiring process for people with disabilities?

Jobseekers and Employees with Disabilities

1. What significant barriers, if any, did you encounter during the job seeking or hiring process (e.g., applying or interviewing)? Please describe.
2. Which of the following assistive technologies did you use during your job search? (Select all that apply)
3. How effective did you find the assistive technologies you used in helping you navigate the job seeking process?
4. Did you interact with AI tools during the job seeking process? If so, which of the following have you used? (Select all that apply)

Appendix D: Survey Methodology

5. What, if any, challenges did you encounter while interacting with AI during the hiring processes, particularly regarding accessibility? Please describe any specific issues or obstacles.

6. How satisfied were you with the accessibility features provided by employers during the job application process?

7. Have you provided accessibility feedback for hiring technologies (e.g., online applications, assessment tools, interview platforms) during your job search or employment? If so, how did you provide that feedback? (Select all that apply)

8. What improvements would you suggest making the job seeking process more accessible for individuals with disabilities?

9. Do you feel that employers are adequately trained to understand and support the needs of job seekers with disabilities?

10. What future trends or advancements in accessibility solutions do you foresee impacting the hiring process for people with disabilities?

NATIONAL ORGANIZATION ON
DISABILITY

Our Vision

NOD envisions a world where every person with a disability has access to compelling job opportunities and inclusive workplaces that provide a foundation to leverage their talent and fulfill their life potential.

Our Mission

NOD is proud to serve:

- **Individuals with disabilities** by fostering professional environments and providing tools that enable people with disabilities to succeed and thrive in the workplace.

- **Organizations** by building enduring employer relationships, conducting research, and leveraging data-fueled insights to change human capital policies, programs, and practices.

- **Society** by using our expertise to change public opinion and shape public policy.

We serve because we are committed to realizing our vision and understand the business imperatives at stake.

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Thank you to our sponsor, Coca-Cola, whose generosity is matched by their dedication and commitment to inclusion and belonging for all.