RESEARCH BRIEF

Goodwill Without Machinery

The Workforce Contingent Programs Cannot See | The Missing Workforce Series, Brief 1 of 4

Prepared by the Neurodivergence and Disabled Contingent Hiring Best Practices Working Group

SEPTEMBER 2026 | BRIEF 1 OF 4 | FROM THE WHITE PAPER THE MISSING WORKFORCE

PATHWAYS OPPORTUNITY COUNCIL

Advancing Inclusion, Igniting Potential

A Joint Initiative of Defiant Solutions, Primary Talent Partners, and AgileOne

01 -- EXECUTIVE SUMMARY

Executive Summary

Every organization the Council surveyed believes disability inclusion matters. Almost none has built the machinery to deliver it in its contingent program. Seventeen programs answered the survey. **Seven of sixteen have a written disability inclusion policy in any form**, and five more do not know whether one exists. **Eight of sixteen do not track disability status of contingent workers**; four more do not know. **One of sixteen has a VMS that supports accommodation requests natively.** The population this series is about is, for most programs, invisible.

The compliance forcing function is gone. The 2025 OFCCP restructuring ended Executive Order 11246 enforcement and proposes to remove Section 503's self-identification invitation and 7 percent utilization goal. Every respondent who answered (11 of 11) said it changed nothing: eight because compliance was never their driver, three because they did not know it had happened. Nothing has replaced it, so the case has to be made on talent and performance, and built voluntarily by the industry itself.

The talent math carries that case without embellishment. In 2025, 22.8 percent of Americans with a disability were employed against 65.2 percent of those without; unemployment ran 8.3 percent against 4.1; roughly three-quarters sat outside the labor force entirely. Autism prevalence has reached 1 in 31, and the largest diagnosed cohort ever measured enters the labor market in the late 2020s. Against that supply sit 1.9 million manufacturing jobs at risk of going unfilled by 2033 and a staffing industry running 376 percent annual temporary-worker turnover. Add 63 million family caregivers, whose binding constraint is schedule flexibility, which is the staffing industry's core product.

Contingent programs are the blind spot because responsibility is deliberately scattered across client, MSP, supplier, and VMS, and disability inclusion falls into the seams. No association, standards body, or agency has published a disability-in-contingent-workforce playbook; this series and its companion Implementation Toolkit are, as far as the Council can determine, the first.

Start Monday with two actions: name who owns disability inclusion in the program, task by task, and adopt a one-page policy statement that names contingent labor explicitly.

Council members also receive the register behind this series: 167 documented inclusive hiring programs at 144 North American public companies, with source documents. Request access or talk with the Working Group at pathways@defiantsolutions.com.

02 -- ABOUT THIS BRIEF

Goodwill Without Machinery

ABOUT THIS BRIEF

This is Brief 1 of four drawn from *The Missing Workforce: Disability and Neurodivergent Inclusion in the Contingent Workforce*, a white paper of the Pathways Opportunity Council's Neurodivergence and Disabled Contingent Hiring Best Practices Working Group, published September 2026. This brief makes the case: who the missing workforce is, why the compliance era that was supposed to include them has ended, and how invisible they are inside contingent programs today. Each brief stands alone; together the four carry the full argument. The complete report, including methodology, the survey instrument, and full response tables, is available from the Council at pathways@defiantsolutions.com.

ABOUT THE EVIDENCE

Survey findings are the Council's own data: a 24-item practitioner survey fielded June 16 to July 28, 2026, through the founding partners' networks; 17 responses, item-level n stated with each figure. Read them as directional signal, not market measurement. **Corpus findings** come from the Council's employer program register: 167 publicly documented inclusive hiring program entries at 144 North American public companies, built from ESG reports, program pages, and press records and re-verified July 2026. **Market data** are cited public sources. The legal landscape described is current as of July 17, 2026, and is not legal advice. Council publications do not name commercial staffing, recruitment, or talent-platform providers; they are described by function.

COUNCIL RESOURCES

Behind this brief sits the Council's employer program register: 167 publicly documented inclusive hiring program entries at 144 North American public companies, each tiered by program intensity, verified for current activity, and paired with the source program pages and ESG report excerpts in a searchable PDF library. The register is re-verified quarterly and is available to Council members, along with the full white paper, the Implementation Toolkit, and the Working Group's monthly sessions. **To request access, ask about membership, or talk with the Working Group about your program, email pathways@defiantsolutions.com.**

A NOTE ON TERMINOLOGY

In this report, *neurodivergent* refers to people whose brains process, learn, communicate, focus, or respond to information in ways that differ from what is commonly considered neurotypical. The term can include autistic people and people with ADHD, dyslexia, dyspraxia, Tourette syndrome, and other neurological or cognitive differences. The list is illustrative, not exhaustive.

Neurodivergence is not a single diagnosis, and not every neurodivergent person identifies as disabled or needs a workplace accommodation. Some conditions qualify as disabilities under applicable law, depending on the individual and the impact on major life activities. This report therefore discusses disability and neurodivergence together where the workforce practices overlap, while recognizing that the terms are not interchangeable.

Scope. The inclusion practices in this report apply to visible and non-visible disabilities; to physical, sensory, cognitive, psychiatric, and neurological differences; and to workers who may need an adjustment without using or identifying with any particular label.

Language preferences vary. Some people prefer identity-first language (“autistic person,” “disabled person”); others prefer person-first language (“person with a disability”). This report uses both respectfully and encourages organizations to follow the preference of the individual.

Survey findings in Chapters 4 and 5 of the full report reflect respondents' own usage of these terms at the time they answered; the definitions above are not applied retroactively to the data.

03 -- THE HEADLINE

Every Program Believes It. Almost None Has Built It.

Every organization we surveyed believes disability inclusion matters. Almost none of them have built the machinery to deliver it in their contingent programs. The distance between those two facts is the subject of this report. Across the seventeen organizations that answered our survey, fewer than half have a written disability inclusion policy in any form (7 of 16, and 5 more do not know whether one exists), disability status is invisible to most programs (8 of 16 do not track it for contingent workers and 4 more do not know), the technology stack is effectively silent (1 of 16 has a vendor management system that supports accommodation requests natively), and supplier contracts are vague or silent on who owns ADA responsibilities and who pays for accommodations (3 of 16 allocate them clearly). The industry says the right things. It has not built the policy, tracking, technology, or contractual infrastructure to do them.

For two decades, federal contractor obligations gave programs a compliance forcing function for disability employment. That function is now substantially gone: the 2025 executive-branch restructuring of OFCCP eliminated Executive Order 11246 enforcement, and the agency has proposed removing Section 503's self-identification and 7 percent utilization goal requirements as well. Every respondent who answered the question (11 of 11) told us the restructuring changed nothing about their disability practices: eight because compliance was never their primary driver, three because they were not aware the rules had changed. Compliance was never the real driver, and nothing has replaced it. The case for disability inclusion in contingent labor must therefore be made where this report makes it, on talent math, retention economics, and performance, and it must be operationalized voluntarily, by the industry itself.[1]

Three numbers

8 of 16

programs do not track disability status of contingent workers, and 4 more do not know whether they do. Only 4 of 16 collect it anywhere: two through the VMS or ATS at requisition, two through voluntary self-identification at onboarding. The population this report is about is, for most programs, literally invisible. (Survey finding.)

1 of 16

programs has a VMS that supports accommodation requests natively. Five more run requests through workarounds or manual processes outside the platform, six say their VMS does not support them at all, and three do not know. Our parallel review of public VMS documentation found no major platform publishing a worker-facing accommodation workflow. (Survey finding; market review.)

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respondents who answered the question report that the 2025-2026 OFCCP restructuring produced no change in their disability practices: eight because compliance was never their primary driver, three because they had not registered that the rules were changing. The compliance era is over; for most of this industry, it never began. (Survey finding.)

04 -- WHY THIS MATTERS NOW

The Talent Math

[1] U.S. Department of Labor, OFCCP, “OFCCP Issues Proposals to Rescind EO 11246 Regulations and Modify Section 503 and VEVRAA Regulations,” July 1, 2025; DOL OFCCP agency status page, accessed July 17, 2026. https://www.dol.gov/agencies/ofccp

Start with the verified numbers, because they are strong enough to carry the argument without embellishment. In 2025, **22.8 percent of Americans with a disability were employed, versus 65.2 percent of those without a disability**, an employment-population gap of more than 42 points. The ratio for people with disabilities has risen about five points over the past decade, from 17.5 percent in 2015, but at that pace the gap closes on a timescale measured in generations, and it widened slightly in 2025 as unemployment rose. The unemployment rate for people with disabilities reached **8.3 percent** in 2025, double the 4.1 percent rate for people without disabilities, and remained elevated into mid-2026 at 8.6 percent in June.[2] Roughly **three-quarters of people with a disability, ages 16 and over, sit outside the labor force entirely**. That figure partly reflects the population's older age profile, but the participation gap holds across every age group; uncounted in any unemployment rate, this is the largest systematically underused labor reserve in the economy.[3]

The neurodivergent pipeline is growing faster than any program's capacity to absorb it. Autism prevalence among U.S. eight-year-olds reached **1 in 31** in CDC's 2022 surveillance year, up from 1 in 36 in 2020 and 1 in 150 in 2000, meaning the largest, most diagnosed autistic cohort ever measured begins entering the labor market in the late 2020s.[4] A sourcing note on numbers this report deliberately does **not** use: the widely repeated claims that “85 percent of autistic adults are unemployed” and that “neurodivergent unemployment runs 30 to 40 percent” do not survive source-tracing. The first mutates a Drexel University finding about adults receiving state developmental-disability services (only 14 percent of that service population held a paid community job), and the second traces to small clinical samples, not representative data.[5] Programs lose credibility when they quote them; the BLS and CDC figures above are stronger and defensible.

Meanwhile the demand side is short of people exactly where contingent labor concentrates. The 2024 Deloitte-Manufacturing Institute talent study projects **3.8 million new manufacturing employees needed by 2033, with roughly 1.9 million jobs at risk of going unfilled** if applicant gaps persist; healthcare was

[2]U.S. Bureau of Labor Statistics, “People with a Disability: Labor Force Characteristics, 2025,” USDL-26-0364, March 3, 2026 (22.8 percent employment-population ratio; 8.3 percent unemployment); DOL Office of Disability Employment Policy, Disability Employment Statistics dashboard, June 2026 (8.6 percent unemployment for people with disabilities, ages 16 and over). https://www.bls.gov/news.release/disabl.nr0.htm; https://www.dol.gov/agencies/odep

[3]BLS, USDL-26-0364, March 3, 2026. Note: 2025 annual figures are 11-month averages (October 2025 data were not collected due to the federal shutdown) and are not strictly comparable with other years. The decade comparison uses BLS USDL-16-1248 (2015 employment-population ratio of 17.5 percent).

[4]Shaw K.A. et al., “Prevalence and Early Identification of Autism Spectrum Disorder Among Children Aged 4 and 8 Years, ADDM Network, 16 Sites, United States, 2022,” MMWR Surveillance Summaries 74(SS-2), April 15, 2025. https://www.cdc.gov/mmwr/volumes/74/ss/ss7402a1.htm

[5]Drexel University A.J. Drexel Autism Institute, National Autism Indicators Report series (2015-2017), drexel.edu/autisminstitute; Ohl A. et al. (2017), n = 254, 38.6 percent unemployment in a single-region vocational sample.

the fastest-growing U.S. staffing vertical in 2025 at a $45.5 billion market.[6] And the channel itself is enormous: U.S. staffing firms employed an average of **2 million temporary and contract workers per week** in the fourth quarter of 2025 and provided employment to **9.5 million people over the course of the year** (down from 11.2 million in 2024, reflecting a soft staffing market), in a U.S. market sized near $184 billion.[7] Independent work, broadly defined, engages tens of millions more.[8] The talent math is not subtle: severe, sector-specific shortages on one side; a vast, credentialed, underused workforce on the other; and an industry whose entire business is connecting supply to demand sitting in between.

The performance case is real but should be stated precisely. Accenture and Disability:IN's research, the canonical business-case source, reports that disability-inclusion leaders achieved **1.6 times more revenue, 2.6 times more net income, and 2 times more economic profit** than peers (2023 study of 346 companies, updating the 2018 finding of 28 percent higher revenue, double net income, and 30 percent higher economic profit margins among Disability Equality Index “Champions”).[9] These are **correlational findings from self-selected benchmark participants**; well-run companies both outperform and invest in inclusion, and the two vintages use different samples and methods, so they should never be blended or quoted as causal. The cleaner operational evidence is retention: supported neurodiversity employment programs report retention in the high eighties to low nineties (DXC's Dandelion Program reports 92 percent, with an independent cost-benefit analysis finding net government savings when autistic workers are in skill-matched roles), against a U.S. staffing industry whose aggregate temporary-worker turnover ran to roughly **376 percent annually** in 2025, down from 416 percent in 2024.[10] In an industry where churn is the largest hidden cost, a talent channel with 92 percent retention is an economic argument that needs no multiplier.

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[6] Deloitte and The Manufacturing Institute, “Taking Charge: Manufacturers Support Growth with Active Workforce Strategies” (2024 Talent Study); healthcare staffing market estimate for 2025 per industry market research aggregations, 2025-2026. https://themanufacturinginstitute.org/manufacturers-need-as-many-as-3-8-million-new-employees-by-2033/

[7] American Staffing Association, Staffing Employment and Sales Survey, Q4 and full-year 2025 (released March 30, 2026): average 2.0 million temporary and contract workers per week in Q4 2025; 9.5 million people employed during 2025, down from 11.2 million in 2024. Staffing Industry Analysts, Global Staffing Market Estimates and Forecasts 2025-2030 (U.S. $184B in 2024; $180.2B forecast for 2026), November 2025 / March 2026.

[8] MBO Partners, 2025 State of Independence: 72.9 million Americans working independently at least occasionally, 27.6 million full-time (broad definition; treat as directional).

[9] Accenture and Disability:IN, “The Disability Inclusion Imperative,” November 2023 (346 Disability Equality Index participants, 2015-2022); Accenture, AAPD and Disability:IN, “Getting to Equal: The Disability Inclusion Advantage,” October 2018.

[10] DXC Technology, Dandelion Program page (350 members, 29 teams, 8 countries; 92 percent retention; vendor-reported), accessed January 2026. https://dxc.com/about-us/inclusion-and-belonging/dxc-dandelion-program; Hedley D. et al., “Cost-benefit analysis of a supported employment program for autistic people,” Autism 2023;27(5):1377-1390. Turnover: American Staffing Association, full-year 2025 data (376 percent, down from 416 percent in 2024), released March 30, 2026.

Why Contingent Programs Are the Blind Spot

Corporate disability inclusion has made genuine progress inside permanent hiring. The 2025 Disability Index drew a record 655 participating companies across eight countries; 99 percent offer flexible work options, 90 percent maintain a disability employee resource group, and 88 percent have a formal accommodations policy.[11] Microsoft marked ten years of its Neurodiversity Hiring Program in 2025; SAP, EY, JPMorgan Chase, and DXC all operate active neurodiversity programs; roughly 50 employers participate in the Neurodiversity @ Work Employer Roundtable.[12] None of this machinery touches the contingent workforce. The Disability Index benchmarks the enterprise, not its staffing supply chain, and its own 2025 report flags vendor accessibility accountability and centralized accommodation funding as persistent gaps.[13]

The structural cause is tri-party complexity. In direct hire, one employer owns policy, budget, process, and liability. In a contingent program, those four things are deliberately scattered across a client, an MSP, staffing suppliers, and a VMS, and disability inclusion falls into the seams. The legal answer to “whose job is the accommodation?” is, under EEOC guidance in force since 1997, **both the staffing firm's and the client's, jointly and severally**; the operational answer in most programs is “no one's, visibly.” JAN's own contingent-worker page, the field's best accommodation resource, routes readers back to that 1997 document and a companion 2000 Q&A; nothing newer exists. This report found no disability-in-contingent-workforce playbook from any industry association, standards body, or government agency. That absence is the gap the Council was formed to close, and the gap Chapter 5 of the full report quantifies.[14][15]

The Post-OFCCP Reality

The regulatory floor under federal-contractor disability practice is being redrawn as this report is written. Sequence of record: Executive Order 14173 (January 21, 2025) revoked Executive Order 11246, the race-and-sex affirmative-action framework, while expressly preserving Section 503 of the Rehabilitation Act and VEVRAA, which are statutory. On July 1, 2025, OFCCP then proposed rules that would **eliminate the Section 503 disability self-identification invitation, the 7 percent utilization goal, and the annual disability data analysis** for federal

[11] Disability:IN, 2025 Disability Index Report (655 submissions across eight countries; self-reported benchmark data). https://disabilityin.org/resource/disability-index

[12] Microsoft Neurodiversity Hiring program page (accessed July 2026); company program pages and 2024-2025 program syntheses cited in Appendix D.

[13] Disability:IN, 2025 Disability Index Report.

[14] U.S. EEOC, “Enforcement Guidance: Application of EEO Laws to Contingent Workers Placed by Temporary Employment Agencies and Other Staffing Firms,” Notice 915.002, December 3, 1997 (in force as of July 2026). https://www.eeoc.gov/laws/guidance/enforcement-guidance-application-eeo-laws-contingent-workers-placed-temporary

[15] Job Accommodation Network, “A to Z: Contingent Workers.” https://askjan.org/topics/contin.cfm

contractors, while nominally retaining nondiscrimination and outreach obligations. Comments closed September 2, 2025, and as of July 17, 2026 the final rules remain unpublished, with the existing requirements technically still in effect but compliance reviews administratively closed and the FY2026 budget proposing to move Section 503 enforcement to the EEOC.[16] Whatever one's view of the policy, the operational consequence is the same: the compliance forcing function for disability employment (self-ID invitations, utilization goals, data analysis) is being dismantled, and the data infrastructure it produced will degrade with it. Disability:IN's benchmarking already shows corporate self-identification rates stuck near 3.5 percent.[17]

Our survey caught the moment precisely: **every respondent who answered the question (11 of 11) said the OFCCP restructuring produced no change** in how their programs handle disability. Eight said compliance was never their primary driver; three had not registered that the rules were changing at all. Read one way, that is reassuring; nobody dismantled anything. Read the other way, it is damning: the compliance regime was never driving contingent practice, because contingent practice barely existed. Meanwhile enforcement risk has not disappeared; it has privatized. The EEOC received 91,503 charges in FY2025, and disability remains among the largest bases, including, pointedly, a $160,000 settlement in January 2026 extracted from Peak Performers, a staffing firm whose own mission is employing people with disabilities, for denying an employee's accommodation and firing her instead of engaging the interactive process. The conclusion writes itself: with the compliance floor gone and litigation risk intact, the case for building disability inclusion into contingent programs must be made on **talent and performance grounds**, and built voluntarily. That is the burden of Chapters 7 through 9 of the full report.[18]

The Caregiver Dimension

Disability in the workforce is not only the worker's. **Sixty-three million Americans, roughly one in four adults, are family caregivers**, and about 70 percent of them are employed; Bank of America's 2025 Workplace Benefits Report, surveying a benefits-eligible workforce that likely understates the contingent population, still finds nearly six in ten employees identifying as caregivers. The binding constraint for this population is schedule volatility, and schedule flexibility is, structurally, the staffing industry's core product. Contingent channels should be the natural on-ramp for caregiver talent, and the Council's survey open-ends say

[16] OFCCP Notices of Proposed Rulemaking, July 1, 2025 (EO 11246 rescission; VEVRAA; Section 503 modifications); Seyfarth Shaw and DCI Consulting client alerts, July 1, 2025; DOL OFCCP status page, accessed July 17, 2026; Good Jobs First, “Does the OFCCP Still Exist?,” October 31, 2025.

[17] Disability:IN, 2025 Disability Index Report (median self-ID approximately 3.5 percent internationally, flat year over year).

[18] Gen Re, “EEOC Trends and Statistics, 2025,” June 17, 2026 (91,503 FY2025 charges, synthesis of EEOC data); U.S. EEOC, “EEOC Sues Peak Performers for Disability Discrimination,” September 24, 2025; consent decree entered January 6, 2026 ($160,000 plus two-year decree). https://www.eeoc.gov/newsroom/peak-performers-pay-160000-eeoc-disability-lawsuit

practitioners know it. Asked what would need to change to accommodate workers with significant caregiving responsibilities, respondents named flexibility once a worker has proven performance, virtual-capable roles, designated roles carved out for these populations with projected headcount attached, manager education, more active sourcing, and accommodation extending back to the application itself. Practitioners were less sure about the contractual form: flexible-work provisions written into program SLAs drew a middling rating (5 of 12 agree, 2 disagree), which reads as uncertainty about the mechanism rather than the goal.[19]

Yet no major dataset connects these dots. The BLS contingent-worker supplement does not ask caregiving questions, and caregiver surveys do not reliably identify staffing employment, so the caregiver-contingent intersection is, like disability itself in these programs, unmeasured.[20] The Working Group treats caregivers as within the inclusion perimeter for practical reasons: the same machinery serves both populations (flexibility-by-design assignments, predictability standards, accommodation-style schedule adjustments), and Playbook Chapter 11 provides the SLA language. A program that can flex for a worker's medical appointments can flex for a parent's IEP meeting; building one channel serves both.

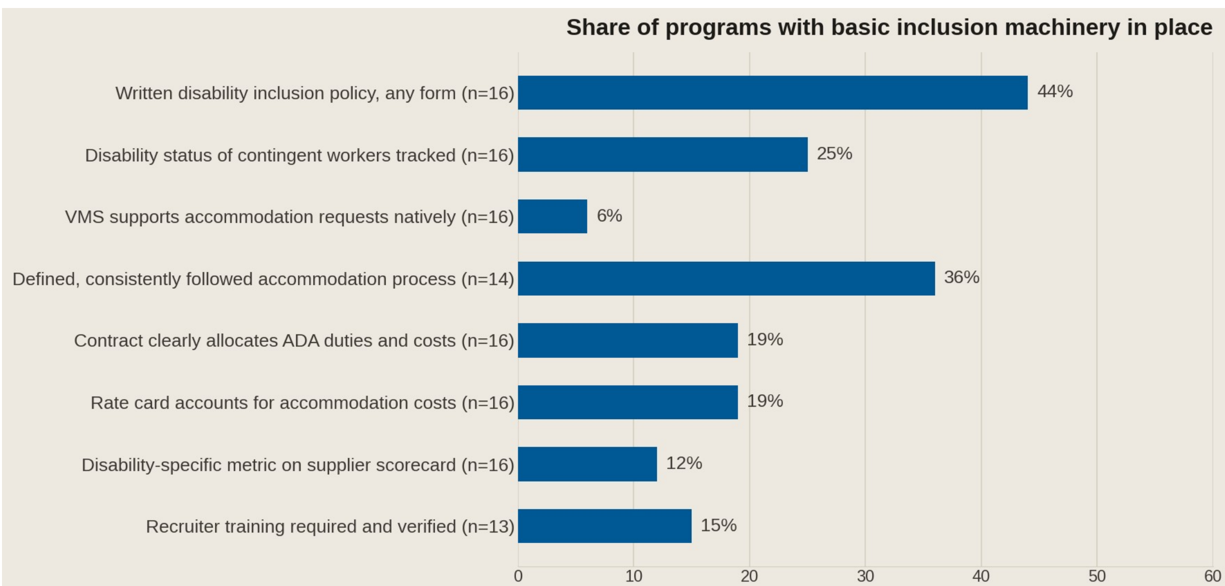
[19] AARP and National Alliance for Caregiving, “Caregiving in the US 2025,” July 2025 (63 million caregivers; approximately 70 percent employed; roughly half of working caregivers report employment impacts); Bank of America, 2025 Workplace Benefits Report.

[20] U.S. BLS, “Contingent and Alternative Employment Arrangements, July 2023,” USDL-24-2267, November 8, 2024 (the most recent official contingent measurement). https://www.bls.gov/news.release/conemp.nr0.htm

05 -- WHAT PROGRAMS CANNOT SEE

Policy and Tracking: Programs Cannot See This Population

You cannot include a population you cannot see. **Seven of sixteen organizations have a formal written policy addressing disabled and neurodivergent workers in any form**: four as a standalone policy, three folded into a broader DEI or accommodation policy. Four have none and no plans to develop one, and five do not know whether one exists, which for operational purposes is the same answer. The instrument asked about the organization's policy, not a contingent-specific one; in conversation, programs with a policy described it as written for permanent employees and silent on contingent labor. **Eight of sixteen do not track disability status of contingent workers, and four more do not know whether they do.** Four collect something: two through the VMS or ATS at requisition, two through voluntary self-identification at onboarding, most often a checkbox inherited from the client's direct-hire onboarding flow. This mirrors the market: Disability:IN's 2025 benchmarking puts median corporate self-identification near 3.5 percent and flat, and OFCCP's proposed rescission of the contractor self-ID invitation would remove the regulatory nudge that produced even that.[21]



Council practitioner survey, June-July 2026. Bars show the share of programs with each element of basic inclusion machinery in place; n varies by item as noted.

The tracking gap has a known cause, and it is not hostility: programs fear that collecting disability data creates legal exposure. The fear is inverted. Voluntary self-identification, properly firewalled from hiring decisions, is exactly what the ADA, Section 503 (while its rules remain), and JAN's protocols all contemplate, and it is the only way to measure whether the other machinery in this report works.

[21] Disability:IN, 2025 Disability Index Report; OFCCP Section 503 NPRM, July 1, 2025.

Playbook Chapter 3 provides the collection protocol, consent language, and privacy guardrails.

THREE ACTIONS, NOT ONE

Voluntary self-identification, disclosure of a condition, and requesting an accommodation are separate actions with separate rules, and programs routinely blur them. **Self-identification** is a confidential workforce-measurement process, firewalled from selection decisions. **Disclosure** is a worker's choice to share a condition with a recruiter, supervisor, or program contact, and it triggers ADA confidentiality obligations the moment it happens. **An accommodation request** opens the interactive process, and it requires neither a self-identification form nor a diagnosis.

A worker can request an adjustment without ever self-identifying, and self-identification does not automatically start an accommodation process. This is why the self-ID protocol (Playbook Chapter 3) and the accommodation register (Playbook Chapter 5) are deliberately separate systems: merging them suppresses both, because workers who decline to self-identify then believe, wrongly, that the accommodation door is closed to them.

06 -- START HERE

Two Actions for Monday Morning

The full program takes a quarter, and the companion Implementation Toolkit's 90-day quick start sequences it. Brief 4 in this series lays out all five Monday-morning actions. Two of them belong with the finding in this brief, because a program cannot fix what it cannot see:

Assign ownership. Name who owns disability inclusion in the contingent program (client, MSP, or supplier, task by task) using the RACI matrix in Playbook Chapter 2. Today the honest answer in most programs is “nobody, severally.”

Adopt the model policy statement. One page, adapted from Playbook Section 2.3, extending the organization's disability inclusion commitments explicitly to contingent labor. Seven of sixteen programs have a written policy in any form today, and five more do not know whether one exists; this closes the gap in a week.

IN THIS SERIES

The Missing Workforce series: Brief 1, *Goodwill Without Machinery*, the workforce contingent programs cannot see, the talent math, and the end of the compliance era (this brief); Brief 2, *Nobody Owns It*, accountability, contracts, and cost in the tri-party model; Brief 3, *The Unexamined Front End*, sourcing barriers, recruiter training, and AI screening; Brief 4, *Measurement Is the Intervention*, the retrenchment test, the maturity model, and what programs do Monday morning.

COUNCIL RESOURCES

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About the Pathways Opportunity Council

The Pathways Opportunity Council is an invite-only council of workforce professionals focused on expanding access and economic mobility for underrepresented talent, including Black, Hispanic, disabled, and veteran communities, as well as other historically disadvantaged groups. The Council's mission is to elevate industry practice and the professional standing of its members by convening leaders committed to measurable improvements in access, hiring, and advancement outcomes. The Council prioritizes organizations that demonstrate sustained, authentic commitment to expanding opportunity. Research and thought leadership are sponsored by Primary Talent Partners and AgileOne and executed by Defiant Solutions as the Council's named consulting partner. For more information email us at pathways@defiantsolutions.com

About Primary Talent Partners

Primary Talent Partners (PTP) is a woman-owned staffing firm focused on contingent workforce programs and full service staffing, including temporary and direct hire. Headquartered near Charlotte, North Carolina, with locations nationwide, PTP serves enterprise clients and supports MSP led and structured workforce programs. The firm operates effectively in margin constrained environments and uses a consultative approach to align candidates with roles, with an emphasis on inclusive talent delivery.

www.primarytalentpartners.com

About AgileOne

AgileOne designs and delivers global workforce and procurement solutions for Fortune 1000 companies. The firm provides consultative support to streamline processes for HR, procurement, and suppliers. AgileOne supports flexible and direct hire workforce programs and helps integrate technologies that capture and manage suppliers across the enterprise. Solutions emphasize operational efficiency, cost control, risk management, vendor management, and alignment to industry best practices.

www.agile-one.com

About Defiant Solutions

Defiant Solutions is the named consulting partner for the Pathways Opportunity Council, supporting the Council's research, stakeholder alignment, and delivery of actionable workforce insights. The firm advises enterprise buyers and workforce solution providers on external workforce strategy, contingent labor governance, and go to market execution. Engagements commonly include diagnostic assessments, operating model and governance design, program and supplier strategy, and fractional strategic leadership.

www.defiantsolutions.com

> **NOTE**
> All web sources were accessed June 1 to July 17, 2026. Regulatory items in flux at access time (OFCCP rulemaking, Colorado AI Act enforcement, the EU Digital Omnibus, and the lapsed Work Opportunity Tax Credit) should be re-verified

before reliance. This brief is for general informational purposes and is not legal advice.[22]

[22] Congressional Research Service, “The Work Opportunity Tax Credit,” R43729, updated May 13, 2026.