

**WHITE PAPER**

# The Missing Workforce

## Disability and Neurodivergent Inclusion in the Contingent Workforce

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

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## **PATHWAYS OPPORTUNITY COUNCIL**

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Advancing Inclusion, Igniting Potential

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**01 -- FRONT MATTER**

# Front Matter

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## 1.1 Title Page and Partner Attribution

This white paper was prepared by the Neurodivergence and Disabled Contingent Hiring Best Practices Working Group of the Pathways Opportunity Council, a joint initiative of **Defiant Solutions**, **Primary Talent Partners**, and **AgileOne**. Cover, founding-partner block, and coalition lockup follow the Council's Document Architecture specification and Sections 05 and 08 of the brand guidelines.

## 1.2 About Pathways Opportunity Council

The Pathways Opportunity Council is a joint initiative of three workforce-solutions firms, Defiant Solutions, Primary Talent Partners, and AgileOne, formed to convert a shared conviction into shared machinery: that disabled and neurodivergent people represent one of the largest underused talent pools in the American economy, and that the contingent workforce industry is uniquely positioned, and uniquely obligated, to connect that pool to work. Together the founding partners operate a combined network of more than 500 client companies spanning staffing, managed service provider (MSP), and workforce solutions sectors.

The Council's Neurodivergence and Disabled Contingent Hiring Best Practices Working Group brings together program owners, MSP leaders, supplier executives, and researchers to study how contingent workforce programs actually treat disability inclusion today, and to build the practical infrastructure the market lacks: a maturity model, model contract language, accommodation workflows, and the companion Implementation Toolkit published alongside this report. The Council's motto, *Advancing Inclusion, Igniting Potential*, describes the operating thesis: goodwill is abundant in this industry; machinery is not. This document is about building the machinery.

**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 reflect respondents' own usage of these terms at the time they answered; the definitions above are not applied retroactively to the data.

**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](mailto: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](http://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](http://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](http://www.defiantsolutions.com)

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## 1.4 Acknowledgments and Working Group Roster

This report exists because seventeen contingent-workforce practitioners gave candor instead of talking points. The Working Group thanks the survey respondents, the program owners, MSP operations leaders, procurement and HR leaders, and staffing supplier executives across the Council network, including those who asked to remain anonymous; their answers and follow-up conversations supply the spine of Chapters 5 and 6.

The Working Group is staffed by volunteers from the three founding partners. Defiant Solutions convened the group and led survey design and drafting; Primary Talent Partners led practitioner outreach and the supplier-facing chapters; AgileOne led the MSP-facing analysis and the maturity model. Individual members are recognized in the Council's membership directory, and respondents who agreed to be recognized are listed in the acknowledgment roster maintained by the Secretariat.

The University of South Carolina Lancaster research team provided institutional partnership for the survey phase, covering instrument review, distribution support, and methodology counsel, and anchors the internship connection pipeline described in Section 9.2. The Working Group also acknowledges the Job Accommodation Network (JAN), AskEARN, and Disability:IN, whose public research and toolkits are cited throughout and whose work this report extends into the contingent context.

## 1.5 How to Read This Report

This is a **practical, market-facing document**, not an academic study and not a peer-reviewed one. It combines three kinds of evidence, and labels them so readers can weigh each appropriately: (1) the Council's own practitioner survey and practitioner conversations, seventeen survey responses that provide directional signal rather than statistically valid market data; (2) primary public data, meaning federal statistics, regulations, and court records, cited in footnotes with publication dates; and (3) published industry research, used with its methodological caveats attached. Where credible sources conflict, we say so rather than picking the convenient number.

Readers should also know what this report is not. It is **not legal advice**; the legal landscape described in Chapter 3 and referenced throughout is current as of July 17, 2026, is changing quickly, and should be re-verified with counsel before reliance. It is not a vendor evaluation. And it is not a complete program: that lives in the companion volume, *The Inclusion Playbook*, which contains the templates, checklists, and the 90-day quick start this report points to. Each chapter ends, where relevant, with a cross-reference to the playbook chapter that operationalizes it.

One editorial convention deserves explanation. **Council publications do not name commercial staffing, recruitment, or talent-platform providers.** The founding partners and Council members compete in those markets, and naming providers would compromise the neutrality this research depends on. Commercial providers are described

by function ("a specialist neurodiversity staffing intermediary"). Employers, nonprofits, academic centers, public agencies, and benchmarking bodies are named. Where a company appears by name in this report, it appears as an employer operating its own program, not as a vendor recommendation.

## 02 -- EXECUTIVE SUMMARY

# Executive Summary

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## 2.1 The Headline: Goodwill Without Machinery

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.<sup>1</sup>

## 2.2 Seven Findings in One Page

Seven findings carry the argument: five from the Council's practitioner survey, developed in Chapter 5, and two from the Council's employer research corpus, developed in Sections 3.4 and 5.7. Headline statistics are flagged the way we will flag them throughout: **survey findings** are the Council's own data (17 responses; item-level n is stated with each figure); **corpus findings** come from the Council's employer program register (167 documented program entries at 144 North American public companies); **market data** are cited public sources.

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<sup>1</sup>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>

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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.)

## 5 of 14

**Accountability is unowned.** Only 5 of 14 programs have a defined, consistently followed process for handling accommodation requests in the tri-party model, despite joint-employer ADA liability attaching to client and staffing firm alike under EEOC guidance in force since 1997. Half of those who answered (7 of 14) name the supplier and client jointly, which is the legally correct answer; five name the client alone; none names the supplier alone or the MSP. Yet 10 of 15 rate their own accommodation process favorably; programs grade themselves on intent. Zero programs described a co-employment incident, confirming that the industry's dominant fear is experienced far less than it is invoked. (Survey finding; EEOC Notice 915.002.)

## \$300

**The levers are known and cheap.** Practitioners rated eight candidate solutions. The top five are structural: industry-wide recognition of DOBE-certified suppliers (9 of 12 agree), VMS-native accommodation features (8 of 12), and standardized contract language, required recruiter training, and disability-specific scorecard metrics (9 of 12 each). Rate card accommodation allowances rated last. That ranking is rational: the Job Accommodation Network's current employer survey finds 61 percent of accommodations

cost nothing and the median one-time cost is \$300. The barrier is not budget. It is machinery. (Survey finding; JAN market data.)<sup>2</sup>

## 19 of 20

neurodivergent-specific hiring programs identified in the Council's review of 167 program entries at 144 North American public companies are FTE internship or direct-hire pipelines. Exactly one operates through a staffing arrangement. The contingent channel is not underserved; it is unoccupied, and Section 5.7 details the whitespace. (*Corpus finding*.)<sup>3</sup>

## 7 of 20

of those programs show hard 2025-2026 evidence of activity after the DEI retrenchment. The survivors share one trait: they publish retention and performance data (Wells Fargo, 82 percent retention on 364 hires; DXC, 92 percent). Metrics are the survival mechanism, the strongest external validation yet of this report's scorecard-first recommendation. (*Corpus finding; company reporting*.)<sup>4</sup>

### 2.3 What Programs Should Do Monday Morning

The full program takes a quarter; the playbook's 90-day quick start sequences it. Five actions can begin Monday morning, each cross-referenced to the companion Implementation Toolkit:

**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.

**Open the accommodation channel.** Stand up the intake workflow in Playbook Chapter 5, meaning a named mailbox, a 48-hour response SLA, and a funding rule decided in

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<sup>2</sup>Job Accommodation Network, “Costs and Benefits of Accommodations” (employer survey of JAN contacts; updated September 17, 2025): 61 percent of accommodations at no cost; \$300 median one-time cost. <https://askjan.org/topics/costs.cfm>

<sup>3</sup>Pathways Opportunity Council employer program dataset, v2 (167 program entries at 144 North American public companies), compiled from corporate ESG and sustainability reports, program pages, and press records; independently re-verified July 2026 (87 percent of URLs live and on-topic). Verification records are maintained in the Council research archive and available to members on request.

<sup>4</sup>Wells Fargo neurodiversity program reporting and press coverage, April 2026 (82 percent retention; 364 hires through Q4 2025). The University of Connecticut's neurodiversity employment research center is now named the Wells Fargo Center for Neurodiversity and Inclusive Employment.

advance, even before the VMS can support it natively. Playbook Section 5.3 is the workaround playbook.

**Fix the front end.** Issue the job-description and requisition standards from Playbook Section 6.1, and ask every screening-tool vendor the disability question from the AI audit checklist in Playbook Section 8.2: does your validation measure adverse impact on candidates with disabilities? Almost none do; New York's bias-audit law, the first in the nation, does not require it.<sup>5</sup>

**Put one metric on the supplier scorecard.** Nine of twelve practitioners rate it a high-impact intervention, and it is the one an MSP can execute inside existing governance this quarter. Playbook Section 9.2 provides definitions and weightings; start with accommodation-request response time and self-ID invitation coverage.

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<sup>5</sup>NYC Local Law 144 of 2021 (bias audits required for sex and race/ethnicity categories only); DCWP enforcement audit, New York State Comptroller, December 2025.

## 03 -- WHY THIS MATTERS NOW

## Why This Matters Now

### 3.1 The Talent Math

*Terms used in this chapter, including neurodivergent and disability, are defined in A Note on Terminology, Section 1.2.*

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.<sup>6</sup> 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.<sup>7</sup>

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.<sup>8</sup> 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.<sup>9</sup> Programs lose

<sup>6</sup>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>

<sup>7</sup>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).

<sup>8</sup>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>

<sup>9</sup>Drexel University A.J. Drexel Autism Institute, National Autism Indicators Report series (2015-2017), [drexel.edu/autisminstitute](https://drexel.edu/autisminstitute); Ohl A. et al. (2017), n = 254, 38.6 percent unemployment in a single-region

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 the fastest-growing U.S. staffing vertical in 2025 at a \$45.5 billion market.<sup>10</sup> 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.<sup>11</sup> Independent work, broadly defined, engages tens of millions more.<sup>12</sup> 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").<sup>13</sup> 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

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vocational sample.

<sup>10</sup>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/>

<sup>11</sup>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.

<sup>12</sup>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).

<sup>13</sup>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.

2024.<sup>14</sup> 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.

### 3.2 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.<sup>15</sup> 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.<sup>16</sup> 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.<sup>17</sup>

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.”<sup>18</sup> 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.<sup>19</sup> 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 quantifies.

### 3.3 The Post-OFCCP Reality

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<sup>14</sup>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.

<sup>15</sup>Disability:IN, 2025 Disability Index Report (655 submissions across eight countries; self-reported benchmark data). <https://disabilityin.org/resource/disability-index>

<sup>16</sup>Microsoft Neurodiversity Hiring program page (accessed July 2026); company program pages and 2024-2025 program syntheses cited in Appendix D.

<sup>17</sup>Disability:IN, 2025 Disability Index Report.

<sup>18</sup>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>

<sup>19</sup>Job Accommodation Network, “A to Z: Contingent Workers.” <https://askjan.org/topics/contin.cfm>

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 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.<sup>20</sup> 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.<sup>21</sup>

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.<sup>22</sup>

### 3.4 The Retrenchment Test

The 2025-2026 period ran a natural experiment on corporate disability and neurodiversity programs, and the Council measured the results. Across its review of 167 publicly documented inclusive hiring program entries at 144 North American public companies

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<sup>20</sup>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.

<sup>21</sup>Disability:IN, 2025 Disability Index Report (median self-ID approximately 3.5 percent internationally, flat year over year).

<sup>22</sup>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>

(methodology in Section 4.4), the Council identified 20 neurodivergent-specific hiring programs. As of July 2026, **only seven show hard 2025-2026 evidence of activity: CIBC, DXC, Goldman Sachs, JPMorgan Chase, Microsoft, Travelers, and Wells Fargo.** Several more are likely active but quiet. For the remainder, no public evidence of activity exists after 2023, and in ten cases program web pages remained live while the program content had been quietly removed. Absence of public evidence is not proof a program has closed, and this report names no program as discontinued. But the direction is unmistakable: the environment turned, and the population of visible programs contracted. The policy backdrop is a matter of record; alongside the OFCCP restructuring described in Section 3.3, the Federal Housing Finance Agency terminated the housing enterprises' DEI initiatives in March 2025, cancelling roughly \$6.4 million in programs.<sup>2324</sup>

The programs that survived share one trait, and it is not size, sector, or budget. **They publish performance numbers.** Wells Fargo reports 82 percent retention across 364 hires through the fourth quarter of 2025, and a university research center now carries its name.<sup>25</sup> DXC's Dandelion Program reports 92 percent retention (Section 3.1). JPMorgan Chase marked its program's tenth anniversary with approximately 200 participants across eight countries.<sup>26</sup> Programs framed as diversity commitments were scrubbed or genericized; programs framed as talent performance, with retention data attached, kept operating and kept publishing. For anyone deciding how to position disability inclusion in a contingent program, the retrenchment period supplies the answer: build it as a performance program with measured outcomes, because that is the framing that survives leadership changes, political cycles, and budget reviews. Chapter 8 operationalizes the lesson.

### 3.5 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 practitioners know it. Asked what would need to change to accommodate workers with significant caregiving responsibilities, respondents named

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<sup>24</sup>Federal Housing Finance Agency directives terminating the housing enterprises' DEI initiatives, March 2025 (approximately \$6.4 million in initiatives cancelled), per contemporaneous coverage and agency statements.

25

<sup>26</sup>JPMorgan Chase Autism at Work tenth-anniversary reporting, 2025-2026 (approximately 200 participants across eight countries).

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.<sup>27</sup>

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.<sup>28</sup> 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.

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<sup>27</sup>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.

<sup>28</sup>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>

## 04 -- METHODOLOGY

# Methodology

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### 4.1 Survey Instrument and Distribution

The Council fielded a 24-item practitioner survey in nine sections (program profile; policy and tracking; self-assessed performance; technology, contracts, and commercial terms; accountability and process; training and sourcing barriers; AI and caregiving; organizational barriers and the OFCCP question; and candidate solutions), distributed through the combined 500-plus-company networks of the three founding partners. Responses were collected from June 16 to July 28, 2026, and the survey closed August 4. The full instrument appears in Appendix A. Distribution was by direct invitation to contingent-workforce program owners, MSP leaders, procurement and HR leaders, and supplier executives; no incentive was offered. The University of South Carolina Lancaster research team served as institutional partner for the survey phase, providing instrument review, distribution support, and methodology counsel. Respondents are identified in this report by role and organization size band only; contact details were optional and are held by the Secretariat.

Question design followed a simple discipline: wherever possible, ask about machinery, not sentiment. Rather than “do you value inclusion,” the instrument asks whether a written policy exists, whether disability status is tracked at defined points, whether the VMS supports accommodation requests natively, what supplier contracts say, who owns the accommodation decision, and what training is required. Sentiment questions were confined to the ranking and rating items (Sections 5 and 7 of the instrument) and the open-ends.

### 4.2 Practitioner Conversations

Respondents were offered a 30-minute follow-up conversation; four accepted and two asked for more information, and those conversations continue into the Working Group's next phase (Section 9.1). The practitioner perspective in this report therefore draws on structured conversations among Working Group members, each of whom operates or oversees contingent programs, and on informal exchanges with respondents and Council network members during the fielding period. The conversations followed a common guide mirroring the survey sections (walk us through your last accommodation request; who paid; what did the VMS do; what would you fix first) and were summarized thematically rather than transcribed. Where this report quotes practitioners (Chapter 6), the quotes are composites: rendered from those summaries, anonymized, and combined so that no single organization is identifiable. Every profile is labeled as a composite.

The conversations served a second function: testing the maturity model and the playbook drafts against practitioner reality. The four-stage model in Chapter 7 and the 90-day quick start in the companion playbook both changed materially between draft and final

based on what practitioners said was actually feasible inside MSP governance cycles, most notably the decision to lead with named ownership and measurement rather than policy, reflecting Section 5.6's finding that practitioners favor program-level levers over cost-based ones.

### 4.3 Sample Profile and Limitations

Seventeen responses were received. Respondents are predominantly contingent workforce program managers (7 of 17), with HR and talent acquisition, procurement, DEI, operations, legal and compliance, and executive leadership also represented, plus a consultant to multiple contingent programs and a specialist supplier that builds disabled and veteran talent pipelines. Organizations range from fewer than 100 workers engaged annually to 50,000 or more; seven of seventeen engage 10,000 or more. Fifteen are headquartered in the United States, one in Canada, and one in the United Kingdom. One respondent answered only the profile questions; sixteen answered substantively and twelve completed the full instrument. Item-level response rates therefore vary, and every figure in this report carries its own n (for example, "5 of 14" reflects three non-answers on that item).

#### LIMITATION

**Read this as directional signal, not market measurement.** Seventeen self-selected responses from one industry network cannot estimate prevalence, and this report makes no such claim. What the sample can do, and does, is three things: falsify the assumption that disability machinery already exists in mature contingent programs (it does not, even here, in a network convened around the issue); surface the specific points where machinery is missing (technology, contracts, ownership); and test interventions against practitioner judgment. External market data are used for scale; survey data are used for mechanism. The two are never blended.

### 4.4 The Employer Research Corpus

The survey measures the demand side from inside programs. To measure the supply side, the Council built and maintains a **167-entry dataset of North American public company inclusive hiring programs**, drawn from corporate ESG and sustainability reports, program pages, and press records, supplemented by a full-text review of roughly 110 corporate ESG report PDFs. The dataset was independently re-verified in July 2026: 87 percent of program URLs confirmed live and on-topic, with the remainder relocated, genericized, or unreachable.<sup>29</sup>

Two verification standards discipline how corpus findings appear in this report. **Page-live** means a program URL resolves to on-topic content. **Program-active** requires evidence within 18 months: a cohort announcement, a live requisition, or a partner confirmation. A

<sup>29</sup>

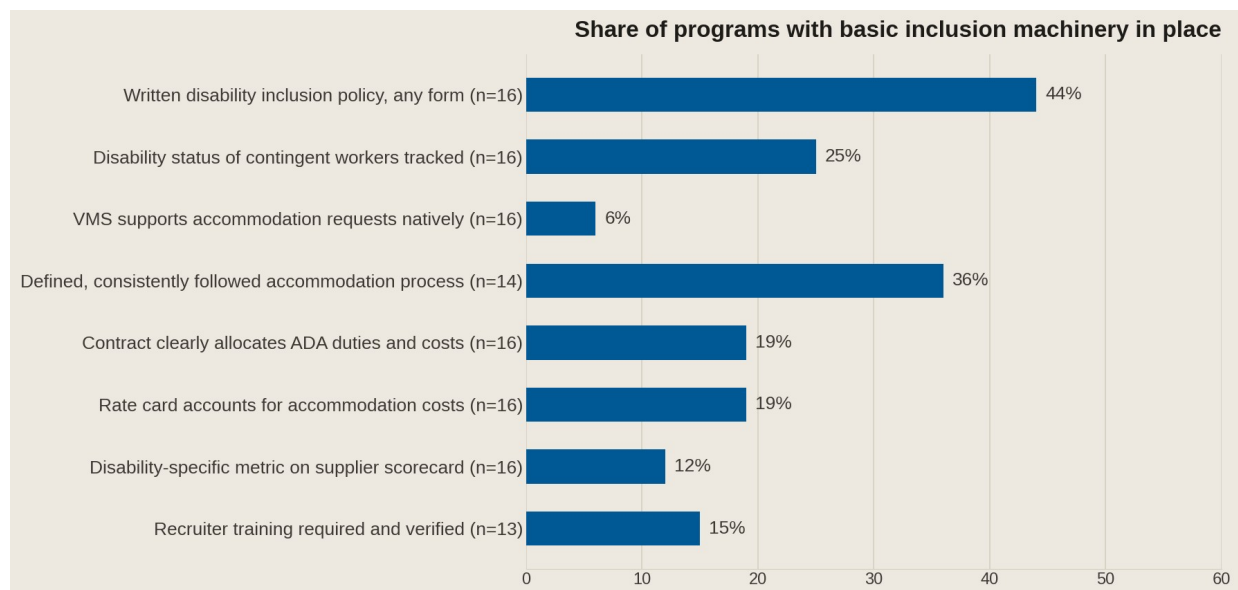
live web page is not an active program, and during the 2025-2026 retrenchment the gap between the two is where citation risk lives; the dataset is therefore re-verified quarterly. The corpus is also tiered by program intensity: a named program with a dedicated intake pathway, a partnership commitment, a policy statement, and an ERG or culture page are four different things, and only the first counts as a hiring program in this report's figures. A disclosure-migration pattern shaped the method itself: several companies now document programs primarily in annual ESG report PDFs while public DEI pages are removed or genericized, which is why the corpus reads the PDFs and not only the web.

## 05 -- THE STATE OF PRACTICE

## The State of Practice: What We Found

## 5.1 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.<sup>30</sup>



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

<sup>30</sup>Disability:IN, 2025 Disability Index Report; OFCCP Section 503 NPRM, July 1, 2025.

whether the other machinery in this report works. 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.

## 5.2 Infrastructure Not Built for Accommodation

The infrastructure findings are the report's most concrete, because infrastructure is binary; a field either exists or it does not. **One of sixteen programs has a VMS that supports accommodation requests natively.** Five more manage requests through workarounds or manual processes outside the platform, six say their VMS does not support accommodation requests at all, three do not know, and one does not use a VMS. Practitioners described email chains, shared spreadsheets, recruiter memory, or silence. The Council's parallel documentation review found the same thing market-wide: the dominant platforms publish interface-accessibility conformance (SAP Fieldglass reports WCAG 2.0 AA conformance in its published service definitions, for example) but **no major VMS publishes a worker-facing accommodation workflow**: no structured intake at assignment, no routing between supplier and client, no cost-code allocation, no assistive-technology provisioning. The accommodation case-management tools that do exist were built for permanent employees of a single employer, not for a tri-party assignment.<sup>31</sup>

**Contracts are mostly vague or silent.** Three of sixteen respondents say their supplier agreements clearly define who is responsible for accommodation and how costs are shared. Five describe the language as vague or boilerplate, four say their contracts are silent, three do not know, and one says it varies by supplier. The template agreements the Working Group reviewed matched the majority: a one-line compliance-with-laws clause, with no allocation of accommodation decision rights, response-time standards, or costs

<sup>31</sup>Council documentation review, July 2026; SAP Fieldglass UK G-Cloud service definition (WCAG conformance, vendor self-attestation); Beeline, Magnit, and Workday VNDLY public documentation.

between client, MSP, and supplier, despite EEOC guidance making clear the parties may allocate these duties by contract but remain jointly liable if no one performs them.<sup>32</sup>

**Rate cards mostly ignore accommodation costs.** Three of sixteen say accommodation costs are built into their rate card framework. Five say rate cards do not address them, four say the question has never been considered, three do not know, and one says it does not apply to their model. In at least nine of sixteen programs, then, a supplier that proactively accommodates is, economically, a supplier that eats margin. Practitioners ranked cost-based fixes lowest not because money is irrelevant but because nobody has designed where the money sits. Playbook Section 4.2 supplies three workable structures, including a centralized program accommodation fund (the mechanism JAN's toolkit documents for direct employers).<sup>33</sup>

**Scorecards are nearly silent.** Supplier scorecards measure fill rate, time-to-fill, quality, and increasingly diversity spend. Two of sixteen programs carry a disability-specific metric for contingent suppliers; three more track disability only inside a general DEI metric; six carry nothing, three do not know, one has no formal scorecard, and one is considering adding a metric. Section 5.6 shows practitioners rate this among the most effective fixes available.

### 5.3 Accountability: Nobody Clearly Owns ADA in the Tri-Party Model

Ask a room of contingent-workforce professionals who is responsible for ADA accommodations for a placed worker and the answers scatter. Half of those who answered (7 of 14) say the staffing supplier and the client jointly; five say the client alone, because it controls the worksite; one has not determined it; one does not know. Nobody named the supplier alone, and nobody named the MSP. The legally correct answer is the joint one: **both, jointly and severally**, under EEOC enforcement guidance that has been in force since December 1997 and was supplemented with ADA-specific questions and answers in 2000. So half the room has the law right. The guidance is unambiguous; programs are not. **Only 5 of 14 respondents have a defined, consistently followed process** for receiving, routing, deciding, funding, and delivering an accommodation request across the three parties. Four handle requests case by case with no defined process, two defer to the client, one defers to the supplier, and one is unclear who is responsible.<sup>34</sup>

The gap between belief and machinery is visible inside the survey itself. Ten of fifteen respondents agree or strongly agree that their organization performs well on the accommodation process for contingent workers. Of those ten, five have a defined

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<sup>32</sup>EEOC Notice 915.002 (1997) and companion ADA Q&A (December 2000): contractual allocation permitted; liability joint and several.

<sup>33</sup>Job Accommodation Network, Workplace Accommodation Toolkit (centralized accommodation funds).

<sup>34</sup>U.S. EEOC, Notice 915.002, December 3, 1997: staffing firm and client typically qualify as joint employers; remedies joint and several with individually assessed punitive damages; guidance remains posted and operative as of July 2026.

process. The other five handle requests case by case, defer them to the client, or did not say how requests are handled at all. The self-assessment is not dishonest; it is the honest report of people who believe requests get handled, because someone, somewhere, usually handles them. That is exactly the condition the recruiter profile in Chapter 6 describes, and it is not machinery.

And yet the industry's favorite objection, co-employment risk, failed to materialize in our data: **zero respondents described a co-employment incident or claim** arising from accommodation or inclusion activity. All eight who answered the open-ended question wrote "N/A" (one added, "we are a federally regulated bank"). The ambiguity is felt, since unclear legal responsibility in the tri-party model ranked third of seven organizational barriers, ahead of technology, supplier readiness, budget, and competing priorities; the incidents are not. The pattern is what Playbook Chapter 10 calls "feared more than experienced": caution about co-employment functions as a reason to keep disability at arm's length, while the actual litigation exposure runs the other direction. The EEOC sued Peak Performers, a staffing firm whose mission is employing people with disabilities, in September 2025 for denying unpaid-leave accommodations and firing the requester; the case settled in January 2026 for \$160,000 plus policy and training requirements. Nobody gets sued for having a clear accommodation process. They get sued for not having one.<sup>35</sup>

## 5.4 Sourcing Barriers: People and Pipeline, Not Facilities

When practitioners ranked five sourcing barriers (n = 12), the results refuted the field's most convenient assumption. By average rank: **(1) recruiter awareness and bias in early screening**, which eight of twelve placed second and which carried the best mean rank; **(2) no active pipeline or sourcing partnerships for this population**, which drew the most first-place votes (six of twelve); **(3) screening and assessment tools that disadvantage neurodivergent candidates**, polarized between first and fourth place; and, tied for last, **(4) client worksite environment and (5) exclusionary job descriptions**. Half the respondents ranked worksite readiness dead last. The barriers are people and pipeline, not buildings. Programs that have deferred inclusion pending "worksite audits" are solving the problem they do not have. The open-ended answers add the texture: "lack of knowledge and acceptance of neurodivergent workers by employers," "lack of awareness of the benefits neurodivergent workers bring," time-to-fill pressure that leaves no room for a different screen, and one program's candid note that experience requirements can rule out candidates a population has already been held back from acquiring.

Asked to rank seven organizational barriers (n = 11), respondents put the two awareness items on top: **lack of understanding or interest first, and lack of leadership awareness or buy-in second**; between them the two drew seven of eleven first-place votes. Unclear

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<sup>35</sup>U.S. EEOC v. St. Vincent de Paul Rehabilitation Services of Texas, Inc. d/b/a Peak Performers, No. 1:25-cv-01551 (W.D. Tex., Austin Div.); EEOC press release September 24, 2025; consent decree signed January 6, 2026.

legal responsibility in the tri-party model ranked third, supplier readiness fourth, technology fifth, budget sixth, and competing DEI priorities last. Not resistance, but the simple absence of the issue from program governance agendas. One respondent put it plainly: with so many priorities, “the extra effort of building this out correctly is a big barrier. We wouldn’t want to do it wrong, so it might be best to keep status quo.” That finding pairs with the practitioner accounts in Chapter 6: the programs that moved did so after one leader asked one question (“where do accommodation requests go?”) and discovered there was no answer. It also explains why the highest-rated interventions in Section 5.6 are visibility mechanisms (scorecard metrics, tracked training, explicit contract language, certification recognition): they put the issue on agendas that currently do not contain it. Pipeline reach, which drew the most first-place votes among sourcing barriers, is the most readily solved: Disability:IN’s DOBE program certifies disability-owned businesses, including staffing firms, for supplier-diversity credit, specialist neurodiversity employment intermediaries maintain screened talent networks, and programs like DXC’s Dandelion have open-sourced their entire supported-employment curriculum.<sup>3637</sup>

## 5.5 Training and AI: The Unexamined Front End

### **Eight of thirteen programs have no recruiter training requirement for disability**

**inclusion:** four require none, and four neither track nor require it of their suppliers. Two do not know; one offers training without requiring it; two require it and verify completion. Recruiters are the people who decide, candidate by candidate, whether a screening tool’s output is trusted. **Five of thirteen have taken no action in the past 24 months on AI hiring-tool bias,** three do not know, two say they do not use AI tools that could create the risk, and three have audited tools, changed vendors, or modified scoring criteria. Conversations suggest “no action” usually means the question has never been put to the vendor. Programs’ self-assessments agree: five of sixteen say they have implemented technology tools that reduce bias against disabled and neurodivergent workers, and five of sixteen say their interview and assessment design works for neurodivergent candidates. This is the unexamined front end: contingent hiring is more automated, more voluminous, and less supervised than direct hire, which makes it the highest-exposure surface for exactly the failures now entering the courts.

The exposure is no longer theoretical. In *Mobley v. Workday*, the first major AI-screening discrimination case, a federal court has conditionally certified a collective of applicants over 40 rejected since September 2020 across a platform used by more than 10,000 employers, and on June 22, 2026 the court allowed an ADA “proxy discrimination” claim to proceed: the allegation that screening on patterns like employment gaps, which commonly correlate with medical leave, treatment, and recovery, screens out disabled

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<sup>36</sup>Disability:IN, Disability-Owned Business Enterprise (DOBE) certification program materials (1,000+ certified firms claimed; program structure verified), accessed July 2026.

<sup>37</sup>DXC Technology, Dandelion Program; program materials open-sourced via Cornell University platform, 2022 (600+ organizations in 99 countries have downloaded).

candidates by proxy.<sup>38</sup> The ACLU's 2024 FTC complaint against Aon Assessments makes the same point about gamified cognitive tests and AI-scored video interviews, tools embedded in contingent pipelines everywhere.<sup>39</sup> Meanwhile the first U.S. bias-audit mandate, New York's Local Law 144, requires audits of automated employment decision tools **for sex and race/ethnicity only; disability is not a required audit category**, and the audit industry that has formed around it (auditing to the four-fifths rule, NIST's AI RMF, and ISO/IEC 42001) does not measure disability screening impact as a standard offering.<sup>40</sup> Colorado's AI Act was rewritten in May 2026 and its enforcement is currently stayed; the EU AI Act's employment provisions face a proposed delay to December 2027; the EEOC removed its own AI-and-ADA technical assistance from its website in early 2025.<sup>41</sup> The regulatory net has a disability-shaped hole in it, which means the protection has to be procured, not awaited. Playbook Section 8.2's audit checklist starts with the only question that currently matters: **does your validation measure adverse impact on candidates with disabilities, and if not, why not?**

## 5.6 What Practitioners Believe Would Work

The survey's final rating exercise asked practitioners (n = 12) to rate eight candidate solutions on a five-point agreement scale. The ranking is the report's roadmap, because it comes from the people who would have to execute it:

| Ran<br>k   | Intervention                                                                | Practitioner verdict                                                                                                                                                                           |
|------------|-----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1          | Industry-wide DOBE supplier certification recognition                       | 9 of 12 agree, 5 strongly (mean 4.17 of 5). Highest-rated. A collective lever: route contingent spend through certified disability-owned suppliers and count it. Section 8.5.                  |
| 2          | VMS/ATS platforms with built-in accommodation request and tracking features | 8 of 12 agree, 5 strongly (4.08). One of sixteen programs has this. Until vendors build it, use the workaround playbook (Playbook Section 5.3) and the procurement question set (Section 8.3). |
| 3<br>(tie) | Standardized contract language clarifying accommodation responsibilities    | 9 of 12 agree (4.00). Replaces the compliance-with-laws boilerplate; 3 of 16 have it today. Model clauses: Playbook Section 4.1.                                                               |

<sup>38</sup>Mobley v. Workday, Inc., No. 3:23-cv-00770-RFL (N.D. Cal.): conditional collective certification May 16, 2025; order of June 22, 2026 permitting ADA proxy-discrimination allegations to proceed (allegations, not findings of liability).

<sup>39</sup>ACLU, FTC complaint regarding Aon Assessments hiring tools, May 2024.

<sup>40</sup>NYC Local Law 144 of 2021; New York State Comptroller audit of DCWP enforcement, December 2025 (enforcement found ineffective; 17 potential violations where the regulator flagged 1); Warden AI and DCI Consulting compliance trackers, 2026.

<sup>41</sup>Colorado SB 26-189 (signed May 14, 2026; enforcement stayed in xAI v. Weiser, April 2026); EU AI Act Digital Omnibus political agreement, May 7, 2026 (not yet law as of July 17, 2026); LFLegal tracking of EEOC guidance removal.

| Ran<br>k   | Intervention                                               | Practitioner verdict                                                                                                                                                                         |
|------------|------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3<br>(tie) | Required recruiter training for all suppliers              | 9 of 12 agree (4.00). Eight of thirteen programs have no requirement today. Curriculum and attestation mechanics: Playbook Chapter 7.                                                        |
| 3<br>(tie) | Disability-specific metrics on MSP supplier scorecards     | 9 of 12 agree (4.00). Two of sixteen carry one today. Creates visibility and agenda force with no new spend. Definitions and weightings: Playbook Section 9.2.                               |
| 6<br>(tie) | Flexible work arrangement policies built into program SLAs | 5 of 12 agree, 2 disagree (3.50). The goal is endorsed in the open-ends; the SLA mechanism is not yet trusted. Playbook Chapter 11.                                                          |
| 6<br>(tie) | AI hiring tool auditing standards and vendor certification | 5 of 12 agree, 7 neutral (3.50). Practitioners have not yet connected the front-end exposure (Section 5.5) to a procurement fix. Playbook Section 8.2.                                       |
| 8          | Rate card frameworks with accommodation cost allowances    | 5 of 12 agree, 1 disagree (3.42). Rated lowest, correctly. JAN finds 61 percent of accommodations cost \$0 and the median one-time cost is \$300. Money is not the bottleneck; machinery is. |

Three readings matter. First, the highest-rated single solution is collective, not programmatic: recognizing DOBE-certified suppliers in diversity spend is something no program can do alone and the industry can do together, and Section 8.5 takes it up. Second, the next four are all **program-level levers**: things a program owner or MSP can do unilaterally, inside existing governance, this quarter. Contract language, recruiter training, and scorecard metrics require no new technology procurement, new law, or new budget authority; VMS-native features require a vendor to build them, but the procurement question that forces the issue costs nothing. Third, the practitioners' ranking aligns with the economics: rate card allowances rated last, and where accommodations do cost something, the amounts are trivial against the cost of churn in an industry with triple-digit annual turnover. The survey's message to the industry is unusually coherent: you do not need permission, budget, or new vendors. You need to build the machinery.

## 5.7 The Supply Side: A Market Scan Confirms the Whitespace

Sections 5.1 through 5.6 prove the machinery gap from the demand side: inside programs, the policy, tracking, technology, and contracts are missing or unknown to the people running them. The Council's employer corpus proves it from the supply side. Of the 20 neurodivergent-specific hiring programs identified across the 167 entries (144 companies), **19 are FTE internship or direct-hire pipelines**. The exception is KeyBank, which for five years has placed neurodivergent professionals as staffing contractors through a specialist neurodiversity staffing intermediary, with 19 contractors placed and 4

converted to full-time roles. One other staffing-mediated design appears in the record, an automaker's contract-to-hire program, but it shows no public activity in recent years. And no organization anywhere in the corpus publishes a practice framework for the contingent channel: skills-based assessment through a VMS, accommodation responsibility split between staffing supplier and client, job coaching for contractors, or conversion metrics through an MSP.<sup>4243</sup>

The corpus also shows where the stable infrastructure actually sits. Employer programs churn; the layer around them persists. Specialist assessment and employment intermediaries, university centers such as the University of Connecticut's neurodiversity employment center, nonprofit alliances, and benchmarking bodies (Disability:IN, the Disability Equality Index, the Neurodiversity @ Work Employer Roundtable) operated continuously across the same period in which corporate programs opened, renamed, and disappeared. For a staffing industry deciding where to build partnerships, that durability ranking matters: the intermediary layer is the load-bearing structure. The Council describes commercial intermediaries by function rather than by name (Section 1.5); the structural point does not depend on any vendor's identity.

Read together, the two evidence bases say the same thing from opposite directions. The survey says the machinery does not exist inside contingent programs, even in a network convened around the issue. The corpus says nobody outside has built it either: no employer, association, or standards body publishes the contingent practice framework. The whitespace this Council was formed to fill is not merely underserved. It is empty, and this report and its companion playbook are, as far as the Council can determine, the first occupants.

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<sup>42</sup>KeyBank published program materials and coverage, reviewed July 2026 (contractor placements through a specialist neurodiversity staffing intermediary; 19 contractors, 4 full-time conversions over five years of operation).

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**06 -- VOICES FROM THE FIELD**

## Voices from the Field

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### 6.1 Practitioner Profiles and Case Examples

Three composite profiles illustrate how the machinery gap is experienced from inside. Each is assembled from conversations among Working Group members, who operate or oversee contingent programs themselves, and from informal exchanges with survey respondents and Council network members during the fielding period. Details are composited and anonymized so that no single organization is identifiable, and the quotations are composite renderings of what practitioners told us, not verbatim transcripts. The survey data in Chapter 5 confirm each pattern the profiles describe.

#### **The program owner who asked the wrong question first**

A contingent-workforce program owner at a national logistics client, running roughly 4,000 active temporary workers through an MSP, began with facilities: a worksite accessibility audit, budgeted and scheduled. What stopped the project was a question from her MSP counterpart during the kickoff: if the audit found a needed modification, whose budget line would pay, and whose approval would be required, the client's, the MSP's, or the staffing supplier's as employer of record? Nobody in the room could answer, and the contracts on the table did not answer either. The audit was deferred; in its place, the program spent three months writing the responsibility-and-funding matrix that should have preceded it. The audit eventually happened, after the contract language existed to act on its findings.

*We were about to spend forty thousand dollars finding problems we had no machinery to fix. The audit wasn't the starting point. The contract was.*

Program owner, client side (composite)

#### **The recruiter who built the workaround**

A senior recruiter at a light-industrial supplier described the accommodation process at her firm as “me.” Candidates disclose to her directly (a request for a written rather than verbal instruction set, for a stool on the line, for a consistent shift because of medication schedules) and she negotiates each one informally with the site supervisor. It works because she is experienced and trusted; it would collapse if she changed jobs, and it is invisible to everyone: the client does not know the accommodations exist, the MSP sees nothing, and no record survives the assignment. When her firm joined a program that added an accommodation field to its onboarding checklist, a manual field, not a VMS feature, request volume roughly tripled in the first quarter. The demand was always there. The channel was not.

*People don't ask for what they think will get them screened out. The day we made asking safe, the requests tripled. Nothing else changed; not the jobs, not the sites, not the people.*

Senior recruiter, staffing supplier (composite)

### The MSP leader who found the metric

An MSP operations leader described the single change that altered supplier behavior in his program: one line on the quarterly supplier scorecard, accommodation-request response time with a 48-hour acknowledgment standard. No penalty structure, no bonus, just measurement and a ranking. Within two quarters, every top-ten supplier in the program had designated an accommodation contact, and two had rewritten their candidate onboarding scripts. His observation captures Section 5.6's central finding: in a supplier ecosystem built around scorecards, **measurement is the intervention**.

*Suppliers optimize what the scorecard measures. That's not cynicism, it's the design of the system. So we measured the thing we cared about.*

MSP operations leader (composite)

## 6.2 What Leading Programs Do Differently

The survey's high-maturity minority, the programs that would score Operational or Embedded on the Chapter 7 model, do four things differently, and none of them is exotic.

**They invite self-identification at contingent onboarding**, with the same voluntary, firewalled framing used in direct hire. **They track accommodations somewhere**; if not in the VMS, then in a named, owned register with response times. **They verify training** rather than announcing it: attestation, audit, scorecard weight. **They put disability on the supplier scorecard**, which is what converts policy into supplier behavior. What distinguishes these programs is not budget or sophistication; it is that someone assigned each piece of the machinery an owner.

The market's evidence points the same direction. The employer programs with documented outcomes at scale (Microsoft's decade-old neurodiversity hiring program, SAP's Autism at Work, EY's Neuro-Diverse Centers of Excellence, JPMorgan Chase's Autism at Work, and DXC's Dandelion Program) share the survey leaders' DNA: structured alternative assessment instead of standard screens, trained interviewers, named support ownership, and measured retention.<sup>44</sup> DXC Dandelion is the most instructive for this industry because it is structurally a staffing model: DXC employs, trains, and embeds neurodivergent teams inside client organizations, with most clients converting participants to permanent hires, and reports 92 percent retention across 350 current team members in eight countries, figures that are vendor-reported but corroborated by an independent cost-benefit evaluation.<sup>45</sup> A note of sourcing discipline the Working Group applies to its own members too: spectacular productivity claims

<sup>44</sup>Microsoft Neurodiversity Hiring program page (accessed July 2026); program profiles for SAP, EY, JPMorgan Chase, and DXC as cited in Appendix D.

attached to some corporate programs ("teams 48 percent faster," "up to 140 percent more productive") have never been published with methodology, and this report deliberately relies on retention, which is consistently reported, plausible, and decisive against contingent churn, rather than on unauditable multipliers.<sup>46</sup>

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<sup>45</sup>DXC Technology, Dandelion Program page (vendor-reported metrics), accessed January 2026; Hedley D. et al., *Autism* 2023;27(5):1377-1390 (independent cost-benefit analysis).

<sup>46</sup>Productivity claims attributed to JPMorgan Chase's Autism at Work circulate in secondary HR press without published methodology; the Working Group classifies them as vendor claims and excludes them from its evidence base.

## 07 -- THE INCLUSION MATURITY MODEL

## The Council Inclusion Maturity Model

### 7.1 Four Stages: Unaware, Aspirational, Operational, Embedded

The Council Inclusion Maturity Model grades a contingent program across five dimensions (**policy, tracking, process, technology, and metrics**) at four stages. A program's stage is its lowest dimension score: machinery, like a chain, is graded by its weakest link.

| Dimension  | Stage 1:<br>Unaware                     | Stage 2:<br>Aspirational              | Stage 3:<br>Operational                                                                     | Stage 4:<br>Embedded                                                  |
|------------|-----------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Policy     | No written coverage of contingent labor | Statement exists; not operationalized | Policy assigns owners, SLAs, funding                                                        | Policy reviewed annually; suppliers attest                            |
| Tracking   | No disability data at any point         | Ad hoc self-ID; unused                | Self-ID at onboarding; privacy guardrails; analyzed quarterly                               | Lifecycle tracking incl. assignment outcomes; trend reporting         |
| Process    | No defined accommodation path           | Informal; person-dependent            | Documented intake, decision, funding, and delivery workflow with 48-hour acknowledgment SLA | Workflow in VMS or case system; escalation tested; cycle-time managed |
| Technology | VMS silent; tools unexamined            | Accessibility gaps known; no plan     | Workaround register operating; vendor requirements issued                                   | VMS-native accommodation features; AI tools audited incl. disability  |
| Metrics    | None                                    | Anecdotes substitute for data         | Scorecard metrics live (response time, self-ID coverage, accommodation cycle time)          | Disability KPIs in program governance; benchmarked across the network |

The model's design reflects the survey: every Operational-and-above behavior named here is something a high-maturity respondent actually does, and every Unaware behavior is something a majority of respondents reported. It is descriptive before it is aspirational.

The employer corpus supplies market proof points for the model's upper stages, drawn from programs with published practices.<sup>47</sup> Assessment redesign at the Process dimension: Microsoft's skills-based interviews and Charles Schwab's skills demonstrations replace the conventional interview rather than accommodating it. Applicant-stage accommodation, the differentiator between Operational and Embedded process: Boeing maintains more than 90 trained Reasonable Accommodation employees, AbbVie's policy spans application through hiring, and Micron proactively informs candidates of interview accommodation options. Readiness before arrival: Accenture and Jacobs train managers and recruiters before cohorts land, because programs fail at the hiring-manager level. Supported onboarding: SAP, Dell, and DXC budget job coaching through the first ninety days, where placements fail. ERGs as recruiting infrastructure rather than affinity groups: Aramark's resource group runs autism hiring events and ADP's business resource groups formally support talent acquisition. At the Metrics dimension, external benchmarking functions as accountability: Aramark has scored 100 on the Disability Equality Index for eight consecutive years and Travelers for seven,<sup>48</sup> and annual benchmark participation has become the most reliable public signal a program still operates. Upstream, Travelers sources through state agencies and universities and helped found the University of Connecticut's neurodiversity employment center, and Freddie Mac runs an internship with the Autistic Self Advocacy Network. Every practice is an existence proof: each upper-stage behavior in the table is being done at scale by a named employer, in direct hire. The Council's work is porting them across the tri-party boundary.

## 7.2 Self-Assessment Criteria

Scoring is deliberately blunt. For each dimension, assign 1-4 using the table above; the program score is the minimum across dimensions, not the average. A program with excellent policy and no tracking is, for a worker who needs an accommodation, an Unaware program. The full worksheet, with diagnostic questions per cell (ten per dimension) and a scoring sheet, is Playbook Appendix B. Two administration rules from the pilot: score from evidence, not intent ("show me the register, the clause, the field"), and score jointly, with client, MSP, and a top supplier in the same room, because the tri-party disagreements surfaced in the scoring conversation are themselves the most useful output.

## 7.3 Where the Market Sits Today

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<sup>47</sup>Company ESG and sustainability reports and program documentation reviewed by the Council, 2024-2026 editions, including Microsoft, Charles Schwab, Boeing, AbbVie, Micron, Accenture, Jacobs, SAP, Dell, DXC, Aramark, ADP, Travelers, and Freddie Mac. Detailed source records are maintained in the Council research archive.

<sup>48</sup>Disability Equality Index results as published by participating companies (Aramark, eight consecutive years scoring 100; Travelers, seven consecutive years), through the 2025 edition.

Mapped against the model, the survey sample clusters at the bottom: most responding programs sit at **Stage 1 (Unaware) or Stage 2 (Aspirational)**, with the modal profile an Aspirational program: a written statement somewhere, goodwill everywhere, and no tracking, process, or metrics underneath. A minority of roughly three to five programs reach Operational on at least three dimensions (five have a defined process, four track status, three allocate duties by contract, two carry a scorecard metric, two verify training), and these are the programs whose practices anchor Chapter 6.2. None scores Embedded across all five dimensions; technology blocks everyone, because the VMS gap is market-wide and cannot be solved unilaterally. The Working Group's read: the market's ceiling is currently set by its platforms, and its floor by the absence of ownership. Recommendations follow accordingly.

## 08 -- RECOMMENDATIONS

# Recommendations by Stakeholder

### WHAT THIS FRAMEWORK DOES NOT REQUIRE

This framework does not require employers to lower essential job standards, guarantee every requested accommodation, collect diagnoses, disclose medical information to supervisors, or wait for perfect technology before acting. It requires four things: named ownership, one reliable intake channel, a funding rule decided in advance, and measurement. The recommendations that follow assume nothing more.

## 8.1 Program Owners and Clients

Clients own the program's terms and should act like it:

**Own the policy.** Adopt a written disability inclusion policy that names contingent labor explicitly (Playbook Section 2.3), and assign a named executive owner.

**Frame it on performance.** Position and fund the program as a talent-performance initiative with published retention and cycle-time outcomes, not as a diversity commitment. The employer corpus shows the framing decision is a survival decision: through the 2025-2026 retrenchment, programs framed on measured performance kept operating while programs framed as commitments were scrubbed (Section 3.4).

**Fund the accommodations.** Establish a centralized program accommodation fund or an explicit allocation rule (Playbook Section 4.2) so cost never defaults to the supplier's margin or the worker's silence. JAN's data (61 percent of accommodations at \$0, a \$300 median one-time cost, and employee retention the most frequently cited employer benefit<sup>49</sup>) makes this the cheapest retention investment in the program.

**Demand the metrics.** Add the disability metric set (Playbook Section 9.2) to the supplier scorecard and the MSP's quarterly business review: self-ID invitation coverage, accommodation acknowledgment within 48 hours, accommodation cycle time, accommodation request volume, and 90-day assignment retention for accommodated workers.

**Procure the technology.** Put the Playbook Section 8.3 question set into every VMS and assessment-tool RFP and renewal: WCAG 2.1 AA conformance, a worker-facing accommodation workflow, and disability-inclusive AI validation.

## 8.2 Managed Service Providers

MSPs are the program's operating system, and every workflow in this report needs an orchestrator:

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<sup>49</sup> Job Accommodation Network, "Costs and Benefits of Accommodations," updated September 17, 2025 (employee retention is the most frequently cited employer benefit of accommodation).

**Build the scorecard.** Own the disability metric definitions, data collection, and quarterly reporting (Playbook Chapter 9). Nine of twelve practitioners rate scorecard metrics a high-impact intervention, and operationally the scorecard is an MSP deliverable.

**Check the durability signal.** When evaluating employer programs, partners, or practices to emulate, weight current-cycle evidence over program-page existence: a cohort announcement, a live requisition, or annual benchmark participation (Disability Equality Index, Neurodiversity @ Work Employer Roundtable) within the past 18 months. A live web page is not an active program (Section 4.4).

**Orchestrate training verification.** Require supplier recruiter training and verify it, through attestation plus audit, rather than accepting announcements (Playbook Section 7.2).

**Manage the accommodation workflow.** Operate the intake register, enforce the 48-hour acknowledgment SLA, run the escalation path (Playbook Sections 5.1 and 5.4), and chair the quarterly review of cycle times and outcomes.

**Broker the technology gap.** Until VMS platforms ship native features, run the workaround playbook (Playbook Section 5.3) on the program's behalf, and carry the program's consolidated feature demands to the VMS provider. An MSP representing 40 programs has leverage a single client does not.

### 8.3 Staffing Suppliers

Suppliers touch the candidate first and the worker longest:

**Train recruiters, and prove it.** Deploy the curriculum in Playbook Section 7.1 (disclosure, accommodation basics, neurodivergent candidate engagement, screening-tool limits) and provide completion evidence to programs that ask.

**Fix job descriptions and screening.** Apply the requisition standards (Playbook Section 6.1): strip non-essential physical requirements, separate genuine demands from boilerplate, and offer assessment alternatives as standard practice, not special favor (Playbook Section 6.2).

**Build pipeline partnerships.** Register with DOBE directories and specialist neurodivergent talent networks, connect with university channels such as the USC Lancaster pipeline (Section 9.2), and track source-of-hire for disabled and neurodivergent candidates (Playbook Section 6.3).

**Pitch by sector.** The employer corpus shows where neurodiversity and disability hiring infrastructure already concentrates: finance and technology run the mature cohort programs and skills-based assessment redesigns, industrials build accommodation capacity through centralized teams and technician pipelines, and healthcare has the least

named-program infrastructure of any major sector, making it the largest greenfield for a supplier arriving with a ready framework.<sup>50</sup>

**Make asking safe.** Adopt the application-stage accommodation notice and intake script (Playbook Section 6.4). The practitioner evidence is unambiguous: when asking is safe, request volume rises. That is the system working, not failing.

## 8.4 VMS and Technology Providers

The technology tier sets the market's ceiling, and the survey says the ceiling is low:

**Build native accommodation support.** A worker-facing request field at assignment, routing logic between supplier and client contacts, status tracking against SLAs, cost-code allocation, and reporting. One of sixteen programs has anything like this today; the first platform to ship it owns a differentiator every MSP in this report has said it would pay attention to.

**Meet and publish accessibility standards.** WCAG 2.1 AA conformance with a current VPAT for every candidate- and worker-facing surface, tested with assistive-technology users, not only automated scanners.

**Open the AI black box.** Publish validation documentation for screening and matching models that includes disability: subgroup adverse-impact analysis, accommodation pathways inside assessments, and audit rights for customers. Local Law 144 does not require it; the market should. The AskEARN/PEAT eRecruiting checklist offers a ready framework.<sup>51</sup>

## 8.5 The Industry Collectively

Some machinery only works if it is shared:

**Recognize DOBE suppliers in diversity spend.** This was the single highest-rated solution in the Council's survey (9 of 12 agree, 5 strongly). Route contingent-labor spend, one of the largest indirect procurement categories, through Disability:IN-certified Disability-Owned Business Enterprises where they exist, and count them in Tier-1/Tier-2 diverse-spend goals alongside other certified categories. Staffing firms themselves can be DOBE-certified.<sup>52</sup>

**Adopt shared standards.** The Council offers the maturity model, the metric definitions, and the model contract language in this report and the playbook as open industry

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<sup>51</sup>AskEARN/PEAT, "Facilitating the Hiring of People with Disabilities Through the Use of eRecruiting Screening Systems, Including AI" (employer checklist).

<sup>52</sup>Disability:IN, DOBE certification program (51 percent+ disability ownership; approximately \$300 fee; three-year cycle), accessed July 2026.

standards. Use them, improve them, and converge on them so that suppliers face one set of expectations rather than seventeen.

**Benchmark across programs.** The Working Group's next phase (Section 9.1) includes a voluntary annual benchmark: participating programs submit the Playbook Chapter 9 metrics, anonymized, and receive the cross-program distribution. Seventeen programs' data is a signal; a hundred programs' data is a market.

## 09 -- CALL TO ACTION

# Call to Action

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### 9.1 The Working Group Next Phase

The Working Group moves from research to build in the 2026-2027 program year, and the Council invites program owners, MSPs, suppliers, and technology providers to join. The operating cadence: **monthly 60-minute virtual working sessions** organized around the playbook chapters (contracts one month, technology the next), **quarterly steering reviews** against the network benchmark, and an annual in-person summit hosted on rotation by the founding partners. Contribution paths are deliberately concrete: pilot the 90-day quick start and report results; contribute contract language or workflow designs to the playbook's next edition; join the annual anonymized benchmark; or host a working session. Membership carries one obligation: implement something and report what happened, because the next edition of this report should be written from results, not intentions.

The Council also commits to maintaining its employer program dataset as standing infrastructure: quarterly re-verification against the program-active standard (Section 4.4), publication of aggregate durability findings, and direct outreach to programs whose public status is uncertain. That outreach serves double duty, as primary data nobody else collects and as an invitation into this Working Group.

### 9.2 The Internship Connection Pipeline

The Council's university partnership converts research into pipeline. The University of South Carolina Lancaster, institutional partner for this report's survey phase, works with the founding partners to place students, including disabled and neurodivergent students, into structured internship and project roles inside Council member programs: staffing operations, MSP program offices, and client workforce teams. The mechanics are deliberately simple: partners commit internship slots per semester; USC Lancaster's career office and disability services coordinate candidate preparation, disclosure counseling, and accommodation planning with the host; and the Working Group collects conversion and retention outcomes for the benchmark. The pipeline serves two purposes at once. It is a talent channel for member programs and a live training ground for the inclusive-program practices this report describes, operated by the people who wrote it.

### 9.3 Adopting the Companion Playbook

Everything this report recommends is operationalized in the companion volume, *The Inclusion Playbook: Policies and Practices for Disability and Neurodivergent Inclusion in Contingent Programs*. The playbook contains the maturity self-assessment and scoring sheet (its Chapter 1 and Appendix B), the RACI matrix and model policy statement (Chapter 2), model contract clauses and rate-card structures (Chapter 4), the end-to-end

accommodation workflow, funding decision tree, and VMS workaround playbook (Chapter 5), sourcing and assessment standards (Chapter 6), training curriculum and verification mechanics (Chapter 7), technology and AI checklists (Chapter 8), the scorecard metric definitions (Chapter 9), the co-employment plain-answer guide (Chapter 10), caregiver flexibility provisions (Chapter 11), and the 90-day quick start (Chapter 12) that sequences all of it. Read this report for the case; pick up the playbook for the build. Both are Council publications, and both will be revised annually from benchmark results and member experience.

**10 -- APPENDICES**

## Appendices

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### **A. Survey Instrument**

The instrument as fielded on SurveyMonkey, June 16 to July 28, 2026 (closed August 4, 2026): twenty-four items in nine sections. Response format is noted in brackets; response options are summarized from the export. Item-level n for each closed item appears in Appendix B.

#### **Section 1: Program Profile**

In what country is your organization primarily headquartered? [Single select, with other]

Approximately how many workers does your organization engage annually? [Single select: fewer than 100; 100 to 499; 500 to 1,999; 2,000 to 9,999; 10,000 to 49,999; 50,000 or more; not applicable / I don't know]

Which best describes your primary role? [Single select: contingent workforce program manager; HR / talent acquisition; procurement / supply chain; DEI; operations / program delivery; legal / compliance; executive / senior leadership; other]

#### **Section 2: Policy and Tracking**

Does your organization have a formal written policy specifically addressing inclusion of disabled and neurodivergent employees/workers? [Single select: yes, a standalone policy; yes, within a broader DEI or accommodation policy; no, and no current plans to develop one; I am not sure]

Does your organization track disability status of contingent workers? [Single select: yes, through the VMS or ATS at the point of requisition; yes, self-identification is collected at onboarding; no, we do not track this; I am not sure]

#### **Section 3: Self-Assessed Performance**

Rate your organization's current performance in the following areas of disability and neurodivergent inclusion: disability-inclusive language in job postings and requisitions; accommodation process for contingent workers; interview and assessment design for neurodivergent candidates; retention support for disabled and neurodivergent contingent workers; implementation of technology tools that reduce bias against disabled and neurodivergent workers. [Five-point agreement scale, strongly disagree to strongly agree, for each]

#### **Section 4: Technology, Contracts, and Commercial Terms**

Does your VMS platform support accommodation requests, such as assistive technology, ergonomic equipment, interpreter or captioning services, job coaches, flexible scheduling, or remote work arrangements? [Single select: yes, requests can be submitted]

and tracked in the VMS; yes, but only with workarounds or manual processes; no, our VMS does not support this; we do not use a VMS; I am not sure]

Do your staffing supplier contracts include explicit language addressing ADA accommodation responsibilities and cost allocation? [Single select: yes, contracts clearly define who is responsible and how costs are shared; yes, but the language is vague or boilerplate; no, our contracts are silent on this; this varies by supplier; I am not sure]

Does your MSP scorecard or supplier performance framework include or track any disability-related metrics? [Single select: yes, disability hiring metrics are part of supplier scorecards and reporting; yes, but only as part of a general DEI metric; no, disability metrics are not included or tracked; we are considering adding them; we do not use a formal supplier scorecard; I am not sure]

Are your organization's rate card structures designed to account for accommodation costs without creating a price penalty? [Single select: yes, built into our rate card framework; no, rate cards do not address accommodation costs; this has not been considered; not applicable to our model; I am not sure]

## **Section 5: Accountability and Process**

When an employee requests a workplace accommodation, what is your organization's process? [Single select: defined process that is consistently followed; case-by-case with no defined process; we defer to the client company; we defer to the staffing supplier; we are unclear on who is responsible; other]

Who in your organization is responsible for providing ADA accommodations to employees? [Single select: the client company (where the work is performed); the staffing supplier; both the supplier and the client, jointly; we have not determined this; I am not sure]

Briefly describe a co-employment or legal complexity your organization has encountered related to disability accommodations in the contingent workforce. (If none, write N/A.)  
[Open text]

## **Section 6: Training and Sourcing Barriers**

Do your recruiters receive formal training on effectively engaging disabled or neurodivergent candidates? [Single select: yes, training is required and verified; yes, training is offered but not required; no, there is no training requirement; this is not something we track or require of suppliers; I am not sure]

Rank the following as the most significant sourcing barriers preventing disabled and neurodivergent talent from entering your contingent workforce programs (1 = biggest barrier, 5 = least significant): job descriptions that exclude or discourage applicants (language, physical requirements); screening and assessment tools that disadvantage neurodivergent candidates; recruiter awareness and bias in early screening stages; client

worksite environment not set up for accommodations; no active pipeline or sourcing partnerships for this population. [Rank 1 to 5]

What else can be a barrier? [Open text]

### **Section 7: AI and Caregiving**

Has your organization taken any action in the past 24 months to address potential AI bias against disabled or neurodivergent candidates? [Single select: yes, we have audited tools, changed vendors, or modified scoring criteria; no action has been taken; we do not use AI hiring tools that could create this risk; I am not sure]

What would need to change in your program to better accommodate workers with significant disability or neurodivergent caregiving responsibilities? [Open text]

### **Section 8: Organizational Barriers and the OFCCP Question**

Rank the following as the most significant organizational barriers to disability and neurodivergent inclusion (1 = biggest barrier): lack of leadership awareness or buy-in; unclear legal responsibility in the tri-party model (client/supplier/MSP); technology and VMS infrastructure that does not support accessibility; supplier base not equipped or trained for this population; no budget or business case for accommodation investments; competing DEI or inclusion priorities; lack of understanding or interest. [Rank 1 to 7]

What other organizational concerns? [Open text]

Has the 2025 restructuring of the OFCCP (including potential removal of the 7 percent utilization goal for disabled workers) changed your organization's approach to disability and neurodivergent hiring? [Single select: yes, expanded; yes, reduced; no change, we were not using OFCCP compliance as our primary driver; no change, we were not aware of the OFCCP changes]

### **Section 9: Candidate Solutions and Follow-Up**

Rate the following potential solutions based on how much impact they would have on disability and neurodivergent inclusion in your program: required recruiter training for all suppliers on disability and neurodivergent sourcing; VMS/ATS platforms with built-in accommodation request and tracking features; AI hiring tool auditing standards and vendor certification requirements; disability-specific metrics added to MSP supplier scorecards; standardized contract language clarifying accommodation responsibilities; industry-wide DOBE (Disability-Owned Business Enterprise) supplier certification recognition; rate card frameworks that include accommodation cost allowances; flexible work arrangement policies built into contingent program SLAs. [Five-point agreement scale for each]

Would you be willing to participate in a 30-minute follow-up interview to share your experience, including any best practices or initiatives you would like to highlight? [Yes, please contact me; maybe, send me more information; no]

If you would like to be contacted for a follow-up interview or to be recognized as a contributing organization in the research, please provide your name, title, organization, and preferred contact email. [Open text, optional]

## B. Full Response Tables

Complete tallies for closed items, with n noted per item. Figures marked † are cited in the body of this report; percentages in the body are rounded. Ranking items are summarized by mean rank (1 = biggest barrier); rating items by the count agreeing or strongly agreeing and the mean on a five-point scale. Tallies were verified against the final survey export (17 responses; survey closed August 4, 2026).

| Item                                                                  | Result                                                                                                                                                                                                                                                                                                              |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Responses (n=17)                                                      | 17 responses received June 16 to July 28, 2026; 16 answered beyond the profile questions; 12 completed the full instrument. Item-level n varies from 11 to 16.                                                                                                                                                      |
| Headquarters (n=17)                                                   | United States 15; Canada 1; United Kingdom 1.                                                                                                                                                                                                                                                                       |
| Workers engaged annually (n=17)                                       | 50,000 or more: 4; 10,000 to 49,999: 3; 2,000 to 9,999: 2; 500 to 1,999: 2; 100 to 499: 3; fewer than 100: 2; not applicable: 1.                                                                                                                                                                                    |
| Primary role (n=17)                                                   | Contingent workforce program manager 7; HR / talent acquisition 2; procurement / supply chain 2; DEI 1; operations / program delivery 1; legal / compliance 1; executive / senior leadership 1; other 2 (a consultant to multiple contingent programs; a specialist disabled and veteran talent-pipeline supplier). |
| Formal written disability and neurodivergent inclusion policy (n=16)  | Standalone policy 4; within a broader DEI or accommodation policy 3; none and no plans 4; not sure 5. †                                                                                                                                                                                                             |
| Tracks disability status of contingent workers (n=16)                 | No 8; not sure 4; yes, via VMS or ATS at requisition 2; yes, self-identification at onboarding 2. †                                                                                                                                                                                                                 |
| Self-rated performance, agree or strongly agree                       | Disability-inclusive job-posting language 7 of 16; accommodation process for contingent workers 10 of 15; interview and assessment design for neurodivergent candidates 5 of 16; retention support 4 of 16; bias-reducing technology tools 5 of 16. †                                                               |
| VMS supports accommodation requests (n=16)                            | Natively, submitted and tracked in the VMS 1; only with workarounds or manual processes 5; not supported 6; not sure 3; no VMS in use 1. †                                                                                                                                                                          |
| Supplier contracts on ADA responsibilities and cost allocation (n=16) | Clearly defined 3; vague or boilerplate 5; silent 4; not sure 3; varies by supplier 1. †                                                                                                                                                                                                                            |

| Item                                                                  | Result                                                                                                                                                                                                                                                                                                                                                                                                                          |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Disability metrics on MSP or supplier scorecard (n=16)                | Disability-specific metrics 2; within a general DEI metric only 3; not included 6; not sure 3; no formal scorecard 1; considering adding 1. †                                                                                                                                                                                                                                                                                   |
| Rate card accounts for accommodation costs (n=16)                     | Yes, built in 3; no 5; not considered 4; not sure 3; not applicable 1. †                                                                                                                                                                                                                                                                                                                                                        |
| Accommodation request process (n=14)                                  | Defined and consistently followed 5; case-by-case with no defined process 4; defer to client 2; defer to staffing supplier 1; unclear who is responsible 1; other (N/A) 1. †                                                                                                                                                                                                                                                    |
| Responsibility for ADA accommodations (n=14)                          | Supplier and client jointly 7; client company 5; not determined 1; not sure 1; supplier alone 0. †                                                                                                                                                                                                                                                                                                                              |
| Co-employment or legal complexity encountered (n=8 answering)         | None described; all eight wrote N/A. †                                                                                                                                                                                                                                                                                                                                                                                          |
| Recruiter training on disability and neurodivergent candidates (n=13) | Required and verified 2; offered but not required 1; no requirement 4; not tracked or required of suppliers 4; not sure 2. †                                                                                                                                                                                                                                                                                                    |
| Sourcing barrier ranking (n=12; 1 = biggest; mean rank)               | Recruiter awareness and bias 2.25 (eight second-place votes); no active pipeline or sourcing partnerships 2.42 (six first-place votes); screening and assessment tools 2.67 (four first-place votes); client worksite environment 3.83 (six last-place votes); exclusionary job descriptions 3.83. †                                                                                                                            |
| Action on AI hiring-tool bias in past 24 months (n=13)                | Audited tools, changed vendors, or modified scoring 3; no action 5; do not use such tools 2; not sure 3. †                                                                                                                                                                                                                                                                                                                      |
| Organizational barrier ranking (n=11; 1 = biggest; mean rank)         | Lack of understanding or interest 2.64; lack of leadership awareness or buy-in 2.82; unclear legal responsibility in the tri-party model 3.91; supplier base not equipped or trained 4.09; technology and VMS infrastructure 4.27; no budget or business case 4.82; competing DEI or inclusion priorities 5.45. †                                                                                                               |
| OFCCP restructuring impact (n=11)                                     | No change, OFCCP compliance was not our primary driver 8; no change, not aware of the changes 3; expanded or reduced 0. †                                                                                                                                                                                                                                                                                                       |
| Solution impact ratings (n=12; agree or strongly agree; mean of 5)    | DOBE supplier certification recognition 9 (4.17); VMS/ATS built-in accommodation features 8 (4.08); standardized contract language 9 (4.00); required recruiter training for all suppliers 9 (4.00); disability-specific scorecard metrics 9 (4.00); flexible work arrangements in program SLAs 5 (3.50); AI hiring tool audit standards and vendor certification 5 (3.50); rate card accommodation cost allowances 5 (3.42). † |

| Item                                                 | Result                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Willing to participate in follow-up interview (n=12) | Yes 4; maybe 2; no 6.                                                                                                                                                                                                                                                                             |
| Caregiver and flexibility open-ends (n=9)            | Flexibility once a worker has proven performance; virtual-capable roles; designated roles with projected headcount; manager education and diversity monitoring; more active sourcing; accommodation at the application stage; one specialist supplier answered that this is already its business. |

## C. Glossary

| Term                                        | Definition                                                                                                                                                                                                                 |
|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Contingent workforce                        | Workers engaged on a non-permanent basis (temporary, contract, project, or gig), typically sourced through staffing suppliers and managed through a program.                                                               |
| MSP (Managed Service Provider)              | An outsourced organization that runs a client's contingent workforce program: supplier management, requisitions, onboarding, reporting, and compliance.                                                                    |
| VMS (Vendor Management System)              | The software platform through which contingent requisitions, candidates, timekeeping, and invoicing flow (e.g., Fieldglass, Beeline, VNDLY, Magnit).                                                                       |
| Co-employment                               | The legal condition in which two entities, typically a staffing firm and its client, both qualify as a worker's employer, sharing obligations and liability. Under EEOC guidance (1997), ADA duties apply to both jointly. |
| Tri-party model                             | The client-MSP-supplier structure of most large contingent programs; a worker on assignment may interact with all three plus a VMS.                                                                                        |
| DOBE (Disability-Owned Business Enterprise) | A business at least 51 percent owned by a person or people with disabilities, certified by Disability:IN for corporate supplier-diversity programs.                                                                        |
| Rate card                                   | The negotiated price schedule for contingent roles (pay rate plus markup) against which suppliers are engaged; typically silent on accommodation costs.                                                                    |
| SOW (Statement of Work)                     | A contract for defined services or deliverables rather than hourly labor; workers engaged under SOWs sit outside many program controls.                                                                                    |
| Self-identification (self-ID)               | Voluntary, confidential disclosure of disability status by a candidate or worker, firewalled from selection decisions and used                                                                                             |

| Term                                      | Definition                                                                                                                                                                                                                                             |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           | for measurement and accommodation outreach.                                                                                                                                                                                                            |
| Reasonable accommodation                  | A modification to a job, process, or work environment enabling a qualified worker with a disability to perform essential functions: schedule changes, assistive technology, reassignment of marginal duties, leave. JAN finds 61 percent cost nothing. |
| AEDT (Automated Employment Decision Tool) | Software that substantially assists or replaces discretionary hiring decisions; subject to bias-audit requirements in New York City (Local Law 144) and emerging state and EU regimes.                                                                 |
| Neurodivergent                            | Umbrella term for people whose neurological functioning differs from typical, including autism, ADHD, dyslexia, dyspraxia, and others. Used alongside, not instead of, the legal category "disability."                                                |

## D. Resources and Partner Organizations

**Pipeline and program partners.** Disability:IN, including the Disability Index benchmark and DOBE certification ([disabilityin.org](https://disabilityin.org)). Job Accommodation Network: accommodation guidance, cost data, and the Workplace Accommodation Toolkit ([askjan.org](https://askjan.org)). AsKEARN and PEAT: employer policy resources and the eRecruiting/AI screening accessibility checklist ([askearn.org](https://askearn.org); [peatworks.org](https://peatworks.org)). Specialist neurodivergent talent networks: screened candidate pools and assessment alternatives, engaged through program partnerships (commercial providers are described by function in Council publications; see Section 1.5). Neurodiversity @ Work Employer Roundtable: employer community of practice. University of South Carolina Lancaster: research and internship pipeline partner.

**Primary sources cited in this report.** U.S. Bureau of Labor Statistics: "Persons with a Disability: Labor Force Characteristics, 2025" (USDOL-26-0364, March 3, 2026) and "Contingent and Alternative Employment Arrangements, July 2023" (USDOL-24-2267, November 8, 2024), [bls.gov](https://bls.gov). DOL/ODEP monthly Disability Employment Statistics dashboard (accessed July 2026), [dol.gov](https://dol.gov). U.S. EEOC: Enforcement Guidance Notice 915.002 (December 3, 1997) and companion ADA Q&A (December 2000), [eeoc.gov](https://eeoc.gov); EEOC v. Peak Performers (filed September 2025; consent decree entered January 6, 2026). OFCCP: proposed rules of July 1, 2025, and agency status page (accessed July 2026), [dol.gov/agencies/ofccp](https://dol.gov/agencies/ofccp). CDC ADDM Network autism prevalence (MMWR 74(SS-2), April 2025), [cdc.gov](https://cdc.gov). Mobley v. Workday, No. 3:23-cv-00770-RFL (N.D. Cal.), orders of May 16, 2025 and June 22, 2026. NYC Local Law 144 and New York State Comptroller DCWP enforcement audit (December 2025). Colorado SB 26-189 (May 2026). EU AI Act, Annex III, and Digital Omnibus status (May-July 2026).

**Industry research.** Accenture and Disability:IN, "The Disability Inclusion Imperative" (2023) and "Getting to Equal" (2018); correlational, see Section 3.1 caveats. Deloitte and

The Manufacturing Institute, 2024 Talent Study. American Staffing Association, Staffing Employment and Sales Survey, Q4 and full-year 2025 (released March 30, 2026). Staffing Industry Analysts market estimates and forecasts (2025-2026). MBO Partners, 2025 State of Independence. AARP and National Alliance for Caregiving, “Caregiving in the US 2025.” Bank of America, 2025 Workplace Benefits Report. Disability:IN, 2025 Disability Index Report. DXC Technology Dandelion Program materials; Hedley et al., Autism 2023;27(5):1377-1390 (independent cost-benefit evaluation).

**Corporate program references.** Microsoft Neurodiversity Hiring; SAP Autism at Work; EY Neuro-Diverse Centers of Excellence; JPMorgan Chase Autism at Work; DXC Dandelion Program (open-sourced curriculum via Cornell University). Program metrics cited are vendor-reported unless an independent evaluation is named.

E. Consolidated Outcome Metrics

Company-reported outcomes for neurodivergent and disabled hiring programs in the employer corpus, consolidated for reference. Figures are the companies' own; the Council has not audited them, and each inherits the verification standards in Section 4.4 and the corpus citations in the chapters above.<sup>53</sup>

| Company                         | Reported outcome                                                               | Basis                                                  |
|---------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------|
| DXC (Dandelion)                 | 92 percent retention across supported neurodivergent teams                     | Program reporting; independent cost-benefit evaluation |
| Wells Fargo                     | 82 percent retention; 364 hires through Q4 2025                                | Program reporting and press coverage, April 2026       |
| SAP (Autism at Work)            | 240+ colleagues in 16 countries                                                | Company reporting                                      |
| JPMorgan Chase (Autism at Work) | Approximately 200 participants across 8 countries at 10th anniversary          | Company reporting                                      |
| KeyBank                         | 19 neurodivergent contractors placed; 4 converted to full time over five years | Company reporting                                      |

**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 Work Opportunity Tax Credit reauthorization, which lapsed December

<sup>53</sup>Company-published figures reviewed July 2026: SAP Autism at Work (240+ colleagues in 16 countries).

31, 2025<sup>54</sup>) should be re-verified before reliance. This report is for general informational purposes and is not legal advice.

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<sup>54</sup>Congressional Research Service, "The Work Opportunity Tax Credit," R43729, updated May 13, 2026.