

Solving “Then What?”: Empowering Investors to Achieve Competitive, Integrated Employment for Persons with Disabilities

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Forward

When starting The Harkin Institute for Public Policy & Citizen Engagement, our vision was to facilitate collaborative, high-quality, and nonpartisan research and analysis to promote understanding and growth in the policy issues I worked so hard on while in office. Our research fellows program was designed with this aim in mind, and through his fellowship work on this paper Robert Ludke has powerfully delivered on this goal. Robert has drafted a finely written and extensively researched paper regarding the involvement of the investor community in promoting the full inclusion of persons with disabilities in competitive, integrated employment across companies of all kinds.

I am proud to release this paper in conjunction with the 2020 Harkin International Disability Employment Summit. This annual event, which began in 2016, brings together individuals from various sectors and across the globe to identify and create strategies to increase the rate of employment of persons with disabilities in competitive, integrated employment. Until now the investor community has not been a major part of these summit meetings, and after reading this white paper, it is clear that this has been a glaring omission.

At the 2017 Harkin Summit I issued a challenge to attendees to set a goal of doubling the labor force participation rate globally for persons with disabilities in the next decade. The Harkin Summit and the ecosystem of Summit speakers and attendees continue to work to meet this challenge. Following from the findings of this paper, the disability community must work to develop outreach activities to the investor community to engage them in advancing this important goal.

Over the last year we have seen both major changes to how we work caused by Covid-19 and a long-overdue societal reckoning around creating truly diverse and inclusive systems and organizations. Companies are embarking on genuine conversations seeking solutions to make the workforce more diverse, and disability inclusion must be part of any solution. It is time for disability inclusion to be firmly – and finally – understood as more than just filling entry level jobs or meeting compliance requirements. This is our moment to seize.

Investors have both the power and the influence to work with the companies they invest in to fully integrate people with disabilities into all levels of their operations – from entry level

to executive management. Investors have proven themselves to be catalysts for spurring the private sector to make society better in other areas such as protecting our natural resources and investing in local communities. We can collaborate with the investor community to permanently fix the system for disability inclusion. This paper provides a roadmap to show us the way.



SENATOR TOM HARKIN (RETIRED)

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- **Carol Nolan Drake** – Founder and CEO, Carlow Consulting, LLC
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- **Elizabeth Daly-Torres** – Global Program Manager in the Office of Disability Inclusion, JPMorgan Chase
- **Jessica Turco** – Co-Founder and Managing Partner, Global Goals Advisory
- **Lisa Woll** – CEO, The Forum on Sustainable and Responsible Investment

Introduction: The Great Reimagining

This is the moment to seize if we are to achieve the vision of competitive, integrated employment for all those with disabilities in the United States workforce. Due to unprecedented changes in what constitutes "work" caused by COVID-19 and a much overdue assessment of the vast socio-economic disparities in the United States brought on by the social unrest following the murder of George Floyd, we are in the midst of a "Great Reimagining" of how human talent is best applied across all of corporate America.

The implications of the reimagining are enormous, and the outcomes of it will play out for generations to come. Human talent impacts the capacity to innovate, produce, and sell every good and service we use in our lives. It is the ultimate determinate in our ability to achieve the advances necessary so that society is better for future generations.

The foundational pieces are in place for the disability inclusion community to be an integral part of the reimagining of today's workforce: the business case for greater disability inclusion in the workforce has been made, leading companies have created models to follow in how to best integrate people with disabilities into the workforce, public policy continues to be a potent force in pushing for the advancement of those with disabilities, and there are more ways than ever to hold organizations accountable for their actions when it comes to hiring, training, and promoting employees with disabilities.

Despite the important groundwork put in place and the vast progress made by the disability community since the enactment of the Americans with Disabilities Act (ADA) in 1990, we have yet to achieve the vision of fully bringing people with disabilities into the workforce and ensuring competitive, integrated employment for them. Elizabeth Daly-Torres, Global Program Manager in the Office of Disability Inclusion at JPMorgan Chase, put a very fine point on the present status of people with disabilities in the workforce, "Companies are too focused on getting people hired – just getting people with disabilities in the door. The focus usually stops at accessibility and accommodations.

The question that's seldom asked at that point is 'Then what?' By that I mean, 'What comes after people with disabilities get hired?' What about access to leadership development, advancement and career pathing? If we aren't asking those questions, our bar is too low."¹

While New York Comptroller Thomas DiNapoli is correct in stating that we have “seen a groundswell of interest” in better integrating people with disabilities into the workforce, he is equally correct in his observation that “there’s still a lot of work to do to realize the goals” of the Americans with Disabilities Act.² Or, as Caroline Casey, the founder and creator of The Valuable 500 – a global community of CEOs committed to revolutionizing disability – said about the efforts of the disability community, “We have never been able to scale and accelerate change. Because, to date, we have not engaged business leadership, the boards of directors, and the decision makers to make them understand the value of the disability community and their families to the business supply chain.”³

FIXING THE SYSTEM: THE CRITICAL ROLE FOR INVESTORS

Scaling change requires a bold, and visionary mindset. As Caroline Casey powerfully observed when asked about the magnitude of the opportunity to better integrate the disability community into reimagining of the future of work, “This is not about fixing the symptoms. This is about fixing the system.”⁴

The premise of this paper is that, more than any other set of actors in society, investors are best positioned to collaborate with the disability community to accelerate and scale a permanent fix to the system. Investors have both the power (ability to allocate money) and influence (ability to shape the dialogue, ability to educate, and the ability to persuade) to drive impactful outcomes throughout the private sector that help companies and employees alike find clarity to Elizabeth Day-Torres’ “Then what?” question.

The scale and scope of investors reach across every aspect of society. Investors range from venture capitalists to investment banks such as Goldman Sachs and JPMorgan Chase to asset managers such as Guggenheim Partners to insurance companies like MAPFRE, to pension funds for public employees such as teachers and firefighters. The amount of money investors around the world control is staggering – estimated to be \$90 trillion.⁵ Putting that in context, the size of the U.S. economy in 2020 is roughly \$22 trillion and China’s economy is about \$14 trillion.⁶

Of the \$90 trillion in assets managed by investors an estimated \$40 trillion is managed under what is known as an environment, social, and governance (ESG) strategy.⁷ Over the last decade ESG has become a widely adopted approach by which investors evaluate the non-financial performance of companies by looking at factors such as: initiatives to reduce pollution and to use “clean” energy such as wind and solar (environment), commitments to

protect human rights and encourage workplace diversity (social), and the formation of a qualified, engaged board of directors that has access to all relevant information about the performance of the company (governance).

Investors increasingly are focused on the connection between the non-financial performance and financial performance of companies. For example, a company with a talented, diverse workforce is more likely to be innovative and productive – factors which translate directly to bottom line performance – than a company with a less talented and poorly motivated team of employees. Similarly, a company with a weak governance and oversight structure is at risk of encountering malfeasance and unethical conduct as compared to a well-run and managed company. While investors seek out investment opportunities in “Blue Chip” companies such as Google and Microsoft, they want to avoid investing in the next Lehman Brothers – the largest ever bankruptcy in the U.S. caused by risky bets worth billions of dollars on esoteric financial schemes tied to residential home values.

Even more relevant to disability inclusion, on May 21, 2020, a group of 22 investors controlling \$2.8 trillion in assets issued a “Joint Investor Statement on Disability Inclusion” in which companies are encouraged “to create inclusive workplaces built for sustainable, long-term performance.” Specifically citing the connection between business performance and meaningful integration of persons with disabilities in the workforce, the statement called on companies to be more aggressive in hiring people with disabilities and assimilating them into the organization while also being more transparent and accountable in those efforts.⁸

Developments in public policy at both the federal and state levels of government will enhance the ability of investors to understand how companies are performing on ESG commitments, including diversity and inclusion practices. Most relevant, the Securities and Exchange Commission (SEC) – the government agency tasked with overseeing the interactions between companies and investors in the United States – took a very important step in August 2020. By adopting a series of changes to compel companies to disclose more information about how they are attracting, training, and retaining employees, the SEC has created a framework by which investors, policymakers, and other public audiences gain better insight into how companies are managing all facets of their human capital.

Combine the resources of investors, the ground rules established through public policy, and the recognition that disability issues are a critical ingredient to fulfilling the social considerations of an effective ESG strategy, it is clear that “Disability inclusion is shaping up to be the next frontier of ESG investing.”⁹ In other words, the managers of \$40 trillion in capital being invested as part of an ESG framework are poised – but not yet fully committed – to push companies to bring disability inclusion considerations more fully into business strategy and operations.

This push by investors is coming in a variety of forms – creating investment funds dedicated to investing in companies with effective disability inclusion (DI) strategies, encouraging companies to set measurable goals and targets for how they hire people with disabilities, fostering opportunities for upward mobility (addressing the “Then what?” question), and using the ownership of shares in a company as a lever to demand the executive team and board of directors create a more inclusive culture.

These actions can permanently change the dynamic around the hiring, training, and retention of people with disabilities and foster a complete reimagining of how people with disabilities work and advance their careers. It was stated time and time again in interviews with experts for this paper that the mindset of companies must move from looking at disability inclusion as a compliance issue or a feel-good charitable endeavor to one that is integral to driving long-term business success. Through both their power and their influence investors are best equipped to not only make that shift happen but also to accelerate that shift to happen quickly.

Investors, however, cannot do this alone. It is imperative that the disability community quickly and aggressively step up its engagements with investors to educate them about the important nuances and considerations when it comes to integrating people with disabilities into a workforce.

It is important to acknowledge that engaging with investors requires access to them so the conversations can be substantive and actionable. Looking across any number of people and organizations in the disability community – Elizabeth-Daly Torres, Ted Kennedy, Jr., Eddie Ndopu, Gina Kline, The Valuable 500, and Disability:IN to name a few – it is clear that the necessary level of access already exists.

Part 1: The Urgency of Fixing the System, and the Opportunity to do so

Fostering meaningful and sustainable employment opportunities for people with disabilities has taken on greater importance because the employment of disabled persons has disproportionately suffered in the recession in 2020. According to the Kessler Foundation and the University of New Hampshire's Institute on Disability, the number of employed working-age people with disabilities in the United States dropped by 20 percent in March and April 2020, compared to 14 percent for the rest of the U.S. workforce. Putting a finer point on that – the 20 percent reduction represents 950,000 lost jobs for people with disabilities in the United States.

A sign of hope is that the Kessler Foundation saw modest improvements in re-hirings over the summer months of 2020 and it estimates that roughly 72 percent of the job reductions were temporary furloughs rather than permanent terminations.¹⁰ Regardless, the long-term viability of people with disabilities working in the U.S economy is tenuous. The reality is that we face an uneven recovery from the economic collapse in 2020 – which will cause an ever-greater divide between the “haves” and “have nots”. As a result, those on the margins of the workforce – such as many people with disabilities – will be among the last to see tangible benefits of an improved economy.

Thus, the challenge before us is two-fold: In the short-term we must – with urgency – “build back” the jobs that were lost or put at risk during the recession of 2020. Over the long-term, we must permanently fix the system so that disability inclusion moves from an aspirational goal to one that is an accepted and valued component of business strategy for companies of all kinds throughout the economy of the United States – and those with disabilities are the ones driving that strategy throughout the economy.

No other event in history has so quickly and dramatically changed the nature of work and the workplace as has COVID-19. As a recent McKinsey report noted, “Across industries, leaders will use the lessons from this large-scale work-from-home experiment to reimagine how work is done – and what role offices should play – in creative and bold ways.”¹¹

Specific to the disability community, the opportunity has never been so promising as the present to play a role in reimagining how work is done. In a matter of weeks in the Spring

of 2020 when the full force of the pandemic hit the global workforce, the notion of workplace accommodation was forever changed from something that was an obstacle to employment of people with disabilities to one that is an advantage. Or, put another way, how people with disabilities have always performed their jobs became the model emulated by countless organizations for all employees. Elizabeth McLain, a disabled activist and Instructor of Musicology at Virginia Tech University, made the point, "We know how to stay in touch remotely, be socially connected while physically distant, make limited resources work in tight situations, make plans and adjust on the spot, build care webs that support each other, and work through challenging circumstances." As a result, it was now the learnings from the disability community that suddenly were in high demand as they were able to help companies "innovate, thrive, and survive."¹²

It is not just the concept of the workplace that changed, what is valued in the traits of people in the workforce also has forever been altered. Due to the massive and sudden dislocation of how workers interact with their place of work, employees that are adaptive, flexible, self-starting, and able to effectively utilize technology to do their jobs are now the most productive – and valued – by their employers. Each of those traits is something that can describe a person with disabilities in the workforce.

The upside for seizing the opportunity presented by the reimagining of the workforce is enormous.

Susanne Bruyère, Academic Director at the Yang-Tan Institute on Employment and Disability at Cornell University, observed, "I have never seen companies so excited to see something work that is not just driven by compliance. It really is the smart, proactive companies that are reassessing how they do business and who are the people they need to bring in so they can thrive."¹³

ENSURING ACCOUNTABILITY

Despite the game-changing opportunity the aftermath of COVID-19 has presented, the disability community is at risk of not fully seizing the moment. The far more powerful force in driving the reimagining of the workforce is society's – especially corporate America's – long-overdue reckoning with the pervasive inequalities in socio-economic opportunity across race, gender, age, and sexual orientation.

Workforce diversity is not a zero-sum game. Rather it is essential to creating a healthy, prosperous society where everyone has the opportunity to share in its successes. Research by Accenture shows that, by increasing the level of employment of persons with disabilities by just one percent, the U.S. economy will grow by \$26 billion – something that benefits all Americans.¹⁴ Viewed at from another perspective, by not bringing people with disabilities more fully into the workforce we are creating a massive drag on our economy. The U.S. government spends in excess of \$260 billion per year through its three largest government assistance programs for people with disabilities.¹⁵

"We never talk about the hole created in our economy because people with disabilities are excluded from meaningful participation in the workforce," said Regina "Gina" Kline, Founder and CEO of SmartJob, LLC, and a civil rights lawyer that led several landmark ADA cases establishing the right of individuals with disabilities to receive the supports necessary to work in competitive, integrated employment. "It is not sustainable to treat people with disabilities as a charity and it benefits no one if people with disabilities aren't working."¹⁶

Also often overlooked is the consumer purchasing power of people with disabilities. According to a 2018 study by the American Institutes for Research, the "total after-tax disposable income for working age people with disabilities is about \$490 billion."¹⁷ Companies – particularly those that produce goods and services – ignore the disability consumer segment at their peril. As persons with disabilities move further up the ladder in organizations their earnings – and ultimately their disposable income available – are likely to increase.

Now is the ideal time to go "all in" on workforce diversity and inclusion.

Carol Nolan Drake, founder and CEO of Carlow Consulting, LLC and a former member of the Board of Trustees of a large institutional investor, put it best, "Diversity in all its forms adds value. Especially in times of turbulence and uncertainty when there are no easy answers."¹⁸

In corporate America's response to COVID-19 and the public outcry to the murder of George Floyd, disability considerations are not prominent in the actions taken throughout the business community as are other diversity considerations such as gender, race, age, and sexual orientation. Consider:

- In less than two weeks following the murder of George Floyd in May 2020, corporate America pledged in excess of \$1.7 billion to address racial injustice and socio-economic disparities in the United States.¹⁹
- Starbucks announced on October 14, 2020 that its CEO compensation will be tied to specific goals around a culture of inclusion and diversity. The focus of its inclusion and diversity goals is the development of BIPOC talent (Black, Indigenous and People of Color) and engaging with other corporations to foster greater “racially and ethnically diverse representation on corporate boards of directors.” While commendable, there is no mention of disability inclusion in the targets by which the CEO will be held accountable to meeting.²⁰
- On October 15 The Business Roundtable, the Washington, DC-based association of the CEOs representing the largest corporations in the United States released “Advancing Racial Equity and Justice” – a far-reaching commitment to breaking down barriers to economic opportunity. There was no mention of disability considerations in that statement.²¹

Despite the impressive size and scope of those initiatives, many corporations have struggled with sustaining the energy over the Summer and Fall of 2020, translating their commitments to action into their operations, and measuring progress and success. There is a very notable omission in that many the commitments made by companies did not connect the dots between two very disparate points of view: on one side the very human concerns of health, safety, opportunity, and justice; and on the other side a much more “bottom line” desire to drive shareholder value creation.

As a result, there is legitimate concern that underlying business models will not be dramatically altered or improved to holistically address the fundamental challenges we face as a society. And, because fundamental change is unlikely to occur in how businesses operate, some have rightfully characterized corporate America’s response as superficial – not necessarily in terms of dollars but rather in terms of ability to drive long-term outcomes. As corporations were in the early stages of rolling out their \$1.7 billion in commitments to address racism Rashad Robinson, President of Color of Change – a nonprofit civil rights advocacy organization – was quoted by the *USA Today*, “What I am seeing across the board is not a full recognition from corporate America about all the ways they have written the rules and all the ways they benefit from the rules that fuel racial discrimination and racial injustice in this country. Now is not the time simply for statements

of support that don't actually come with real structural change. Now is the time to actually change rules and change behavior."²²

We must also be cognizant of the fact that there is a significant intersection of disabilities and race in the United States. For example, 3 in 10 Native Americans have a disability, 1 in 4 Blacks have a disability, 1 in 6 Hispanics have a disability, and more than half of all Americans experiencing long-term poverty have a disability.²³

As Eddie Ndopu, an award winning, internationally-acclaimed activist, humanitarian, and one of seventeen global Advocates appointed by the Secretary General of the United Nations for the Sustainable Development Goals, said, "It is important to start with the sociological perspective that recognizes people experience discrimination simultaneously across many factors. Being poor and being disabled are mutually reinforcing and one can't be addressed without the other."²⁴

In other words, by making commitments to address racial, gender, or socio-economic inequalities that do not include disability considerations, a significant number of Americans will be left behind.

Investors, however, can be a catalyst for systemic change. Increasingly they appreciate the importance of creating a more inclusive and talented workforce, free from biases and discrimination. Investors want the rules and behavior to change because they want to deploy their capital to companies assembling the most talented workforces because it is those companies best able to generate profits in a responsible manner over the long term. Investors do not look at workforce development as a charity. They want companies to hire the best people regardless of who they are or where they come from – and then retain that talent. The equation is simple: if a company does not hire or retain good people, it will fail to innovate, be unable to attract new customers, suffer ethical missteps, and lose its market share. As a result, the company will go out of business and investors will lose their money. Just as investors are motivated to make money by finding good investments, they are equally motivated to stay away from bad investments that lose money.

THE CHANGING ROLE OF COMPANIES IN SOCIETY

In 2020 we witnessed that the long-held belief that corporations exist solely to benefit shareholders was challenged and found to be lacking. As Lyn Paine, Baker Foundation Professor at Harvard Business School wrote in *Harvard Business Review*, "The pandemic has brought home the tight connection between business and society, and underscored the threat

posed by risks stemming from large-scale societal problems that proponents of the shareholder model have traditionally regarded as outside the purview of business. The pandemic has shown that...companies cannot so easily disconnect themselves from society-at-large."²⁵

Because of the increasingly tight connection between the private sector and society, companies no longer are evaluated solely on how much money they make or how much their share price goes up or down. Rather, there is a growing belief that the performance of companies must be looked at holistically: the quality of the products they create, impact in the communities in which they operate, and investments in human capital – not just employees but also people outside the organization.

A further demonstration of the connection between companies and society is that the concept of human capital is quickly evolving beyond that of just direct employees. Human capital now encompasses "stakeholders" – all people impacted by the company. While it starts with employees it also includes customers, residents of local communities, and the people who supply the products used and sold by the company – be it the cobalt used in the batteries of our iPhones or the coffee and chocolate found on the shelves of Whole Foods. A company that makes substantial investments in the health and wellbeing of its employees but ignores acts of discrimination and human rights violations in its supply chain is not a company operating in the best interests of its stakeholders. Rather, the approach to fostering human capital must be inclusive in every aspect and consistent throughout the entire reach of the organization.

Part 2: The S in ESG: Ground Zero for Fixing the System

The social considerations (known as the “S”) in ESG is the collection of factors that investors use to evaluate and understand a company’s relationships with society (such as its workforce, residents of local communities, customers, and political leaders). It also covers topics such as: consumer protection and worker safety, adherence to labor laws, avoidance of corruption, illegal, and unethical activities, and respect for human rights throughout all levels of the organization, including global supply chains.

As a result, the S in ESG is quickly becoming “Ground Zero” for making the connection between human capital and business performance. What is most striking is that, in just a few months’ time in the Spring and Summer of 2020, investors, policymakers, and corporate executives realized that the inherent weaknesses of measuring how companies engage with society must urgently be addressed.

The S in ESG has long been the most subjective, least measurable, and most overlooked aspect of ESG. Rather than looking at S in factual, metric-driven terms that can be used to measure and monitor performance against established goals, investors have relied on anecdotal and qualitative information provided by companies. For example, research by the New York University (NYU) Stern Business School in 2017 found that only 8 percent out of the more than 1,700 indicators used across all types of ESG reporting frameworks actually measured the effects and outcomes of company activities that fall under the S category. Conversely, 92 percent of indicators measured company efforts and activities.²⁶ As one analysis of the NYU Stern research noted, “this is the financial equivalent of assessing a company’s R&D programme by looking at the scale and target of R&D investment without any evaluation of the effectiveness or outcome of the investment.”²⁷

In other words, all of society fell into the trap of measuring words and promises of companies, not impact and results. As a result, it has been virtually impossible to hold companies accountable for their performance on S issues, especially on very complex issues such as workplace diversity and inclusion practices.

If a study conducted in 2017 represented the softness of metrics to measure S performance, consider the language being used in 2020 by S&P Global – a company that

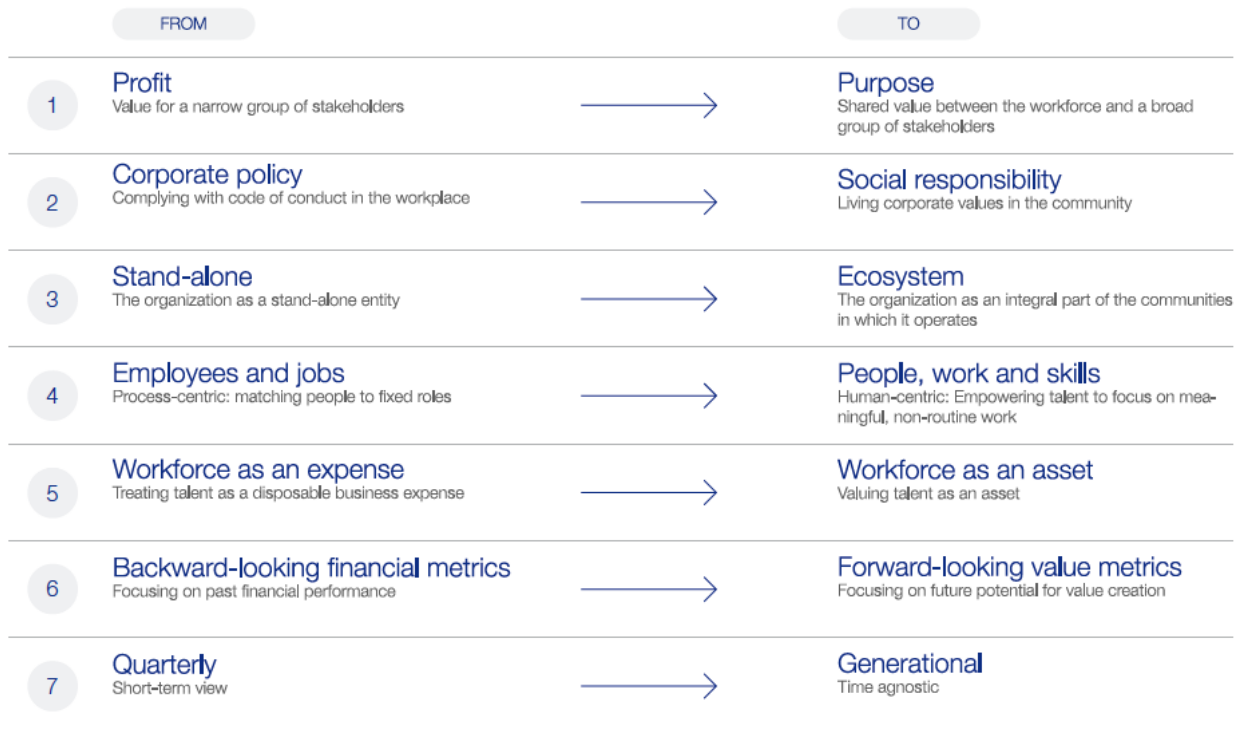
provides volumes of data on corporate performance to help investors better understand the companies in which they invest:

“Companies are aware that having a diverse value chain – including suppliers, customers, distributors, and revenue streams – is good for business. Yet many are still to achieve a truly diverse workforce. We foresee a widening competitive gap between companies that adopt effective strategies for workforce and diversity, and those that do not. In our view, inclusion is key to getting the strategy right.

As part of our social assessment in the ESG Evaluation, we assess how effective a company is at developing a productive and inclusive workforce. Key indicators include employee retention and turnover rates, labor standards, pay, benefits, and rewards. We also assess whether fair labor standards are entrenched across the value chain. Moreover, we evaluate an entity's preparedness to respond to long-term risks and opportunities, including from changing demographics and social patterns. We assess the extent to which decision-making demonstrates the company's commitment to its long-term strategy and sustainability, as well as its success at building an inclusive workplace culture.”²⁸

Notice the difference in mindset from 2017 to 2020: There is nothing in S&P Global's data collection methodology that focuses on the size and scope of efforts to create an inclusive workforce. The traditional – and “soft” – indicators by which companies used to disclose performance on workforces have been replaced by indicators focused on impact and outcomes. In other words, in 2020 and going forward, the time and money companies will spend on their workforces are irrelevant. Impact and outcomes are what matter. Money spent is meaningless unless it accomplishes something.

Just as the metrics are getting more specific and precise in what they measure, the impact and outcomes are becoming more holistic, transformative, and long-term in nature. The World Economic Forum and Willis Towers Watson (a global insurance and risk advisory firm) identified the following seven “guiding principles” designed to help shift the mindset of how human capital is to be measured and treated as an asset that creates value rather than incurs a cost to the bottom line. It is only through the disruption of 2020 have we begun a concerted effort to break out of the “From” in order to achieve the “To”.

Figure 1: Seven Principles of Valuing Human Capital²⁹

The seven principles reinforce three important trends at the intersection of human capital, value creation, and investing. The first is the connection between companies and society where the employees of companies are the lynchpin in the efforts by companies to create value in society, especially in the "Purpose", "Social responsibility", and "Ecosystem" principles. This is the manifestation of Lyn Paine's observation that the pandemic has accelerated the connection between companies and society.

The second is the greater precision being brought to metrics focused on value creation – a vision similar to the criteria outlined by S&P Global. That trend is seen in the "Workforce as an asset" and "Forward-looking value metrics". The third trend is the shift to a long-term mindset in the "Generational" principle. Investors want to invest in companies filled with talented employees able to sustain themselves over a long time.

THE GROWING INTEREST IN "S" BY POLICYMAKERS

With the enactment of and subsequent amendments to expansive public laws such as the Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, and the Americans with

Disabilities Act of 1990, the disability community has long been engaged with policymakers to enact legislation that both broadens the rights and improves the lives of people with disabilities. However, because of a long-standing resistance in the United States to legislating how businesses should operate when it comes to their performance on environmental, social, and governance practices, there is little chance of the disability community successfully achieving meaningful legislative measures that will require companies to integrate disability considerations into their ESG practices.

There are, however, other types of policy efforts underway to help investors get more meaningful information on corporate ESG practices so that investors, in turn, are able to make more informed investment decisions. The most recent development to encourage corporate disclosure of the S issues of ESG in the United States was advanced by the Securities and Exchange Commission (SEC). In August 2020, the SEC finalized a rulemaking designed to improve and modernize the disclosure requirements for publicly traded companies in the United States around a variety of legal and risk factors. One part of the rulemaking is a "new disclosure topic that will require SEC reporting companies to provide a description of their human capital resources to the extent such disclosures would be material to an understanding of the company's business."³⁰

Put more simply, the new SEC reporting requirements require companies to disclose how they are attracting, retaining, and investing in their employees, particularly if the employees are critical to the critical business operations and long-term success of the company.

Similar to the vision of the World Economic Forum's Seven Principles of Valuing Human Capital that connected human capital to value creation, SEC Chairman Jay Clayton said upon the issuance of the rulemaking, "the rules we adopt today...seek to elicit information that will allow today's investors to make more informed investment decisions. I am particularly supportive of the increased focus on human capital disclosures, which for various industries and companies can be an important driver of long-term value."³¹

In a separate statement about the rule Chairman Clayton went even further, "I cannot remember engaging with a high quality, lasting company that did not focus on attracting, developing, and enhancing its people. To the extent those efforts have a material impact on their performance, I believe investors benefit from understanding the drivers of that performance."³²

Some investors and experts – including the two Democratic commissioners serving on the SEC – opposed the rule as being too vague in nature and allowing companies too much flexibility in how to determine human capital and disclose their performance on human capital. Specifically, the critics to the SEC rule argued that it was not prescriptive enough to actually spur change as it merely relies on companies to follow general principles in determining the amount of information to disclose.

While there is merit to those arguments, the fact of the matter is that the SEC rule provides a valuable starting point for improved disclosure. And, with improved disclosure comes greater expectations that companies will step up their investments in human capital. Given the expansive nature in which the SEC now is looking at human capital – such as human resources (hiring, training, and retention), compensation and benefits, risk management (ethics, compliance, labor relations, etc.), and governance (board composition, executive oversight of human capital practices, etc.) – there are many areas of overlap with disability inclusion practices. As a result, “The inherent flexibility of the SEC’s new rules will be important precedents for companies evaluating the materiality of [human capital management] and [disability inclusion] to their operations.”³³

Despite her dissent to the rule, SEC Commissioner Caroline Crenshaw opened the door for other opportunities to better integrate disability inclusion considerations into ESG practices. Specifically, Commissioner Crenshaw called for an internal SEC task force “to undertake an immediate study on how investors can and do use more information about human capital management...and other Environmental, Social, and Governance (“ESG”) metrics to assess the long-term financial performance of a company.” Crenshaw also reiterated her support for the formation of an “external ESG Advisory Committee, comprised of investors, issuers, and subject matter experts” to ensure that the SEC “is aware of and responding to current ESG trends affecting all aspects of the market.”³⁴

Just as the SEC has taken a tentative step to compel more corporate disclosure on ESG issues, Congress is doing the same. In July 2020, the U.S. Government Accountability Office (GAO) – an independent agency often termed as the “congressional watchdog” – completed an in-depth assessment at the request of Senator Mark Warner (D-VA) on the “quality and consistency of public companies’ ESG disclosure” and the usefulness of those disclosures to investors. The report found that, while investors “use ESG disclosures to monitor companies’ management of ESG risks, inform their vote at shareholder meetings,

or make stock purchasing decisions," most of the ESG data disclosed by companies is inconsistent and incomplete.³⁵

To address those shortcomings the GAO made a series of recommendations for how the SEC, in particular, could enact "new requirements for specific ESG disclosures."³⁶ While the SEC under President Trump has argued against the merits of requiring specific ESG disclosures as unduly inflexible and unworkable in a dynamic business environment, many investors are stepping up pressure on the SEC to provide clearer guidelines over what types of information must be disclosed and the level of specificity of that information. Investors argue that, failing greater accuracy and precision in ESG disclosures, they will be unable to obtain a true understanding of how companies engage with society to create long-term value. While the GAO report made no mention of disability inclusion considerations, the report's findings reinforce the broader intent of many in the policy community to help investors get the information they need on ESG issues.

Part 3: The Other Actors in the Ecosystem of the S of ESG

Investors are part of an ecosystem of actors focused on bringing more precision to the data, improving the integration of “S” issues in ESG to business models, and creating meaningful outcomes that result in long-term value for investors and society alike. This ecosystem contains multiple points of entry for advocates of disability inclusion to engage in the process of pushing businesses to better appreciate that a workplace which embraces a vision of competitive, integrated employment for people with disabilities provides a competitive advantage in the marketplace.

1. DATA PROVIDERS

Organizations like S&P Global, MSCI, and Sustainalytics have created vast infrastructures to collect, analyze, and share data on most every metric used to measure the ESG performance of companies.

As demonstrated by the statement from S&P Global earlier in the paper, the Data Providers increasingly are assertive in seeking meaningful data on ESG performance. Furthermore, the Data Providers have built powerful platforms by which vast amounts of data can be aggregated, distilled, and analyzed, and those platforms are backed up by large teams of quantitative and qualitative experts who interpret the data both for private client engagements and for public dissemination. The reach of the Data Providers is vast – there are over 125 operating around the world according to State Street Global Advisors.³⁷ And research has shown that “Not only are the ESG raters potentially influencing the returns on an ever-expanding pool of retirement savings, university endowments and other investments, they are also affecting companies’ strategic decisions: some 33 percent of companies say inquiries from sustainability analysts have shaped their overall business strategy.”³⁸

Increasingly, the Data Providers are collaborating with investors in advocating for corporations to adopt meaningful ESG practices in order to create value for stakeholders – all those impacted by the company, including investors, employees, supply chain partners, residents in communities in which the company operates, and so on. The Data Providers are acutely aware their ability to deliver something of value to their clients (investors) is only as good as the data they collect.

Given the active and ongoing engagement Data Providers have with investors and companies, they are positioned to be a powerful force in raising awareness of disability inclusion practices. Perhaps more than the investors, the Data Providers can establish the framework for what competitive, integrated employment for persons with disabilities looks like and how it is measured. Because disability inclusion has historically ranked low on ESG priority issues and is only now emerging as a frontier in investing, there is much to be done to educate the Data Providers on disability inclusion considerations.

2. ESG REPORTING FRAMEWORKS AND STANDARDS

Putting it mildly, there has been a proliferation of frameworks and standards by which companies can disclose their performance on ESG issues and investors and other public audiences can track and analyze the performance. With a few exceptions where there is a legal mandate to disclose information to government regulatory agencies, compliance with the ESG reporting frameworks and standards is voluntary.³⁹ It is through these frameworks and standards that companies have the opportunity to convey their value proposition around "Then what?" whereby they demonstrate how they are not only hiring people with disabilities but also growing their careers in ways that are rewarding and, where appropriate, providing opportunities to enter into senior leadership positions.

Many frameworks and standards are forming among affiliations of investment firms, companies, and industry experts. For example, the Embankment Project for Inclusive Capitalism (EPIC) – an effort backed by global investors such as CalPERS, JPMorgan Chase, and Blackrock along with companies such as Johnson&Johnson and Pepsico – launched an initiative "to develop consistent, high-quality metrics" so that companies can measure how they deploy their human capital in ways understood and appreciated by investors.⁴⁰

Perhaps the most relevant reporting framework for disability inclusion issues in ESG practices is the Sustainability Accounting Standards Board (SASB). Established in 2011 with the express purpose of identifying and disclosing ESG information in a manner most useful to both investors and the SEC, SASB has created a series of principles-based reporting frameworks that identify the ESG topics of companies "that most directly impact their long-term value creation" and communicate that information "more efficiently and effectively to investors."⁴¹

SASB is particularly relevant for two reasons. First, it is becoming the most accepted framework by investors for ESG reporting. As noted, SASB was established with providing

data to facilitate investment decisions and as it has evolved in the nine years since its inception, investors have played a prominent role in how the SASB framework compels companies to be transparent on ESG issues in a manner that is most useful to investors. Second, SASB is in the very early stages of its Human Capital Project, which is being done in consultation with investors, companies, and ESG experts. The Human Capital Project will be looking at disability inclusion issues from the perspectives of value creation, risk, and market opportunity – three factors that are most critical to the success of any company. In other words, SASB will not be looking at disability inclusion as a compliance issue. It is looking at disability inclusion as essential to business strategy.⁴²

The SASB approach is very different from that of the Global Reporting Initiative (GRI), arguably the most widely used ESG reporting framework around the world. The disclosure sections of GRI relevant to disabilities are much more compliance based. For example, companies are asked to disclose:

- Identified incidents of discrimination
- Total number of hours spent training on policies and procedures concerning aspects of people with disabilities rights
- Total number of incidents of non-compliance with regulations and/or voluntary codes regarding the portrayal of people with disabilities in advertising and other marketing communications⁴³

Another approach to encouraging companies to initiate and then follow through on commitments around ESG issues are rankings and indices. These frameworks require companies to fill out some form of a questionnaire or survey, which are then analyzed and ranked across all the respondents participating in the process. For ESG issues, the Dow Jones Sustainability Index (DJSI) is both the most selective and the most rigorous – only companies with an extensive track record of ESG performance are invited to participate and fewer are selected for the final rankings. Other prominent rankings and indices such as Just Capital's JUST Index, the Corporate Knights' Global 100, and the Domini 400 also are seen as gold standards by which companies disclose ESG performance.

However, these rankings and indices approach the intersection of ESG and disability inclusion much like that of GRI – disclosure and reporting on disability inclusion issues is much more oriented towards compliance rather than integral to business strategy. One notable index constructed specifically to encourage disclosure, accountability, and improvement in corporate DI practices is Disability:IN's Disability Equality Index.

Now in its sixth year, the Disability Equality Index has nearly 250 companies participating, with strong representation across the financial services, technology, health care, insurance, and manufacturing industries. Companies are assessed and ranked across categories such as Employment Practices, Culture and Leadership, Enterprise-Wide Access, Community Engagement, and Supplier Diversity.⁴⁴

3. GLOBAL CONVENING AND THOUGHT LEADERSHIP PLATFORMS

The World Economic Forum, the United Nations, the Milken Institute, Skoll Foundation, and SOCAP (Social Capital Markets) are examples of organizations that have developed convening and thought leadership platforms with a global reach. Each of these has seen a dramatic expansion in partnership and collaboration with the investor community in recent years around ESG issues. More than just hosting an annual event, these platforms are engaged in year-around thought leadership by creating content asserting the value of concepts such as ESG, engaging in responsible business practices, treating employees as human capital rather than an overhead expense, and promoting the view that companies exist to serve stakeholders, not just shareholders.

Perhaps more important, investors engage these platforms with the intent of finding collaborators to accelerate change and impact on those issues, always with an eye of improving the ability of companies in which they invest to generate sustained, long-term value creation. As Jessica Turco, Co-Founder and Managing Partner of Global Goals Advisory, said, "People participate in these platforms in order to forge strategic partnerships of all kinds, knowing they are likely to be engaged on these issues for the long-term."⁴⁵

Beyond being forums for developing partnerships, these venues play a driving role in setting national, regional, and global agendas on the topics of the day. Each of them brings together heads of state, CEOs from major corporations, respected journalists, and leading academics. The conversations that take place at those venues often lead to policy development.

While the focus on ESG-related issues across these platforms is impressive, disability inclusion is rarely a primary topic. Just as we saw with the quickly-evolving conversation around the "S" in ESG, the work of these platforms historically has been driven by more specific S issues around diversity of race, gender, sexual orientation, and so on rather than

more system-wide challenges such as access to health care, reducing poverty, and expanding educational opportunities. This is where Eddie Ndopu's point about the intersectionality of disability and income level is reinforced – the barriers to socio-economic opportunity cannot be looked at in isolation from each other.

However, that is not to assert that any of these organizations are opposed to a more substantive focus on DI considerations. These platforms must be viewed as opportunities to do more than just raise awareness of disability inclusion as a business strategy – they are entry points to an entire ecosystem of partners by which the awareness is translated into action, outcomes, and impact. Perhaps the best example of the ability of these platforms to convene people of influence to collaborate on disability inclusion issues is the World Economic Forum hosting the launch of the Valuable 500 at its annual meeting in Davos, Switzerland in January 2019. The Valuable 500 is an organization founded by Caroline Casey comprised of the global community of CEOs committed to revolutionizing disability inclusion through business leadership. Beyond hosting the launch of the Valuable 500, the World Economic Forum and Casey have continued their collaboration by creating virtual panel discussions to explore how businesses can foster opportunities for people with disabilities while enhancing their innovation potential.

Part 4: Answering “Then What?”: Empowering the Disability Community to Achieve Competitive, Integrated Employment

Below are a series of recommendations organized across Short-Term and Long-Term time horizons on which the disability community can engage, both on its own and in partnership with investors. The recommendations range from the tactical (creating virtual events) to the transformative (launching an investment fund), all with a vision of transforming our workforce to one that is diverse in every form and based on talent, skills, and merit. That transformation will achieve competitive, integrated, employment for persons with disabilities. In so doing, Elizabeth Daly-Torres’ “Then what?” question will be forever answered. People with disabilities not only will be fully integrated into the workforce with a clear path for advancement – they will be driving the development of the next generation of companies able to create lasting value for all of society.

SHORT-TERM TIME HORIZON (2021)

1. Create a Series of Virtual Convenings with the Investor Community

It was clear throughout the research for this paper that the investor and disability communities share many common goals when it comes to valuing and appreciating the role of human talent in fostering long-term value creation by companies. However, both communities often speak a different language and do not fully understand the perspectives each brings to achieving a vision of competitive, integrated employment. For example, investors do not universally understand what “competitive, integrated employment” means from the perspective of a person with disabilities. Yet, the disability community has much to learn from investors about how to communicate the value proposition of “competitive, integrated employment” in a manner that not only resonates with investors but also the companies in which they invest – and those who are ultimately hiring people with disabilities and fully integrating them into the organization.

Some investors spoken to for this paper were blunt in what they need to become more effective advocates for disability inclusion practices. First, a better understanding of the connection between disability inclusion and value creation. And, second, a deeper

appreciation for what best in class disability inclusion practices look like on a day in, day out basis in a company. While not mentioned by many investors another important consideration is the purchasing power of the disability community as it represents a significant segment of consumers wanting to purchase goods and services from those companies making a real commitment to disability inclusion.

It also is important to note that investors come in all different sizes and enter the investment stages of companies at different points in time. Early stage investors such as venture capital represent an opportunity to take a “bottom up” approach by working with the companies at their inception to integrate DI considerations into all facets of the organization. Pension funds, asset managers, and investment banks usually invest in much more mature companies that are publicly traded – more of a “top-down” approach. Those types of investors are positioned to work with established companies to adapt and improve their business models and organizational structures.

2. Go Where the Investors Are

Another consistent theme heard from the investor community is the importance of the disability community more fully assimilating the value proposition of competitive, integrated employment into the agendas and venues for collaboration established by the prominent convening bodies noted in the previous section of this paper.

As Lisa Woll, CEO of The Forum for Sustainable and Responsible Investment said, “The most impactful thing the disability community can do is get on the agenda at the big conferences that bring together investors of all kinds. Disability inclusion isn’t really on their agendas right now.”⁴⁶

However, going where the investors are is not just limited to conferences and webinars hosted by the global convening platforms like the World Economic Forum. It also means building relationships with organizations that are tightly connected with investors and helping investors work with companies to adopt ESG best practices. One example is The Forum for Sustainable and Responsible Investment – an organization that represents investors across all asset classes with a mission of rapidly shifting the “investment process towards...the generation of positive social and environmental impacts.”⁴⁷ Another is CERES – a global organization with the mission of “working with the most influential investors and companies to build leadership and drive solutions throughout the economy.”⁴⁸ A final example is The Business Roundtable – an organization comprised of the CEOs of the largest companies in the U.S. – that is leading the effort

for companies to manage themselves in ways that create value for all stakeholders, not just shareholders.

3. Participate in SASB's Human Capital Management Project

Through its human capital management project, the Sustainability Accounting Standards Board (SASB) is about to embark upon a public consultation to its an effort to understand how the measurement and disclosure of diversity and inclusion practices can be improved as part of SASB's framework for ESG disclosure. As noted previously in the paper, SASB approaches human capital from the perspective of strategic management, not compliance. Thus, SASB is well positioned to advance the vision of competitive, integrated employment in ways that are meaningful to investors – most notably the ability to measure competitive, integrated employment in the context of bottom-line business performance.

4. Engage in the Policy Process

The disability community has a long and successful history of engaging with policymakers at all levels of government to expand and protect the rights of people with disabilities. With the incoming Biden Administration there will be ample opportunity to engage the policy process around ESG issues as it is expected his administration will be quite active in that area. As noted, the SEC rule on human capital is seen as a good starting point – but it is expected a Democrat-led SEC will take a much more prescriptive approach to defining human capital and outlining how companies must disclose their performance on it.

Another opportunity is the nascent – but growing – conversation among policymakers to “fundamentally reform” capitalism to one that is oriented more towards stakeholders as it is shareholders. Of note, senators Warren (D-MA), Warner (D-VA), Carper (D-DE) and Baldwin (D-WI) have launched a working group to propose policy proposals to shift the focus of companies from short-term profits to long-term value creation. It is expected the working group will provide ideas for the Biden Administration to translate into policy and develop legislation to be introduced in Congress. It will be important for disability inclusion to be integrated into those policy measures – especially given the prominent acknowledgements made by the Biden transition team about the importance of disability inclusion.

By bringing disability inclusion into the policy process from the perspective of system-wide value creation requires a change of mindset compared to the more traditional ways the disability community has engaged in policymaking.

"There is a ghettoization of disability issues when they are not connected to the systemic issues of society. We have to get away from looking at commissions and task forces to solve our problems because doing so ignores the cross-cutting impact of disability inclusion across society broadly, and organizations more specifically," said Eddie Ndopu.⁴⁹

5. Create a Campaign

In light of disability considerations not being as prominent in the conversation around the "S" in ESG but with the policy process offering opportunities for engagement, it is worth considering launching a campaign led by the disability community to demonstrate that disability considerations are a critical component to the concept of workplace diversity and inclusion along with a value generator for companies, investors, and society as a whole.

The successes of organizations such as The Valuable 500 and Disability:IN serve as a powerful template for how a campaign that brings together the disability community, investors, companies, and global thought leadership platforms could be created and launched. The more diverse and broad-based the members of the campaign, the better. Carol Nolan Drake said it best, "To achieve change you need all types of champions. You must have more than just the disability community talking about the value proposition of disability inclusion."⁵⁰

LONG-TERM TIME HORIZON (2022 AND BEYOND)

1. Further Prove the Business Case for Disability Inclusion

A number of investors interviewed for this paper mentioned the need for more high quality, thoroughly researched studies showing the connection between disability inclusion and brand, reputation, and bottom-line performance of companies. While studies such as Accenture's "Getting to Equal: The Disability Inclusion Advantage" are a strong starting point, more are needed to definitively prove the business case to a sophisticated audience such as investors that place a premium on rigorous research and data-driven findings.

This is not research for the sake of conducting research. Rather, "It is about trust and generating trust," observed Abraham McAllister, an advisor and investment manager. "While one great study goes a long way, humans are

averaging machines. Something as complex as disability inclusion needs a lot of validation across many scenarios.”⁵¹

2. Measure with Eye Towards Creating Value

If we are to move away from treating disability inclusion as a compliance issue to one that is oriented towards value creation, the metrics by which we measure disability inclusion and its outcomes must change dramatically. It is important to be clear to investors what resources you are seeking and how it can enhance their investments.

Instead of measuring generic, compliance-oriented indicators (such as the number of people hired or sensitivity trainings) we must look at metrics that cover:⁵²

- The interaction between a person’s capabilities (limitation in functioning) and environmental barriers (physical, social, cultural, or legislative) that may limit their participation in a workplace
- Number of employees voluntarily disclosing disabilities
- Compensation
 - There must be a particular focus on equal pay for equal work
- Executive level and board composition
- Promotions, career advancement, and retention
- Number of external partnerships used to identify and recruit people with disabilities into an organization (and at all levels of the organization)
- Investments in disability-focused initiatives in communities in which the company operates
- Engagement with vendors and supply chain partners to integrate disability inclusion into those organizations, and accurately measure the outcomes
- Alignment between marketing and communications efforts and disability inclusion commitments
 - Namely, the story around disability inclusion told via marketing and communications must match the reality of the progress made of those commitments

If the disability community is able to develop a series of effective metrics, three positive outcomes will occur:

- Companies will have a much clearer sense for how to create meaningful steps to foster competitive, integrated employment

- Investors will have a more effective roadmap by which to work with companies in creating those steps
- Society will have much more effective metrics by which to hold companies accountable for their commitments, or lack thereof

3. Use Proxy Voting as a Force for Change

Because publicly traded companies sometimes make decisions that require shareholder approval, proxy voting is the process by which shareholders express their opinion through a vote, generally one vote per share owned. Given that investors often own roughly 70 percent of the shares in most companies, proxy voting can be a powerful force for change. Over the last 10 years, large investors (such as asset managers and pension funds) increasingly have used the proxy voting process to compel companies to adopt more rigorous ESG practices. Historically, investors have focused on pressuring companies to adopt strong governance practices overseen by qualified boards of directors, demonstrating in their ESG reporting they are adapting their business to the realities of climate change, and ensuring safe workplaces.

Given the dramatic changes that occurred to our society in 2020, there is an expectation that the 2021 proxy season will see a high focus on workplace diversity and inclusion practices.⁵³ For example, Institutional Shareholder Services – one of the most prominent proxy advisory firms in the world – already has indicated that in the 2021 proxy season it will recommend voting against the chairs of board nominating committees that are part of board of directors with no racially or ethnically diverse members.⁵⁴ How the 2021 proxy season plays out will provide a roadmap for the disability community to actively engage with investors in the proxy voting process to bring greater awareness and accountability to workplace diversity and inclusion practices.

4. Further Integration into the United Nations Sustainable Development Goals

Launched in 2015, the United Nations Sustainable Development Goals (SDGs) are a global roadmap by which the private and public sectors can more effectively collaborate with a vision of ending extreme poverty while protecting the health of the planet by 2030. Fostering greater social and economic inclusion for people with disabilities is woven throughout a number of the SDGs, including Goal 3: Good Health and Well-Being, Goal 8: Decent Work and Economic Growth, Goal 10: Reduced Inequality, and Goal 11: Sustainable Cities and Communities.

The SDGs also are significant because they represent the most comprehensive effort in the history of global development to integrate disability considerations into a vision of creating a “just, equitable, tolerant, and socially inclusive world where the needs of the most vulnerable are met.”

There is a growing number of investors pushing companies to align their business practices to the SDGs believing that doing so is the best articulation of how a company creates value for society. For example, U.S.-based investors, such as Alliance Bernstein and American Century Investments have created investment strategies targeted to those companies incorporating the UN SDGs into their business practices. Because disability inclusion intersects with a number of the SDGs it is imperative that investors – and the companies in which they invest – are more aware of the role disability inclusion plays in achieving the goal of the SDGs.

We must also acknowledge that achieving the fundamental goal of the SDGs – improving the lives of people everywhere – cannot be met without achieving disability inclusion.

“This is not a noble enterprise to include the excluded,” said Eddie Ndopu. “When the SDGs are met for persons with disabilities, the positive externalities for society are exponentially greater. We must treat disability inclusion as part and parcel of attaining the SDGs.”⁵⁵

5. Become Early Stage Investors

The final recommendation to foster systemic change is the boldest – a group of experts from the disability community creating an early stage investment fund, either on their own or in collaboration with a venture capital firm. The goal is to invest in entrepreneurs who recognize that disability inclusion is critical to long-term value creation. The greatest opportunity to make that connection is when the vision of the entrepreneur is being translated into a viable business plan able to attract investment capital. “The most important decisions are made before the investment occurs. It is about finding entrepreneurs that share our values about building companies that will be sustainable over 50 years and making the world better in the process,” said Maryanna Saenko, Co-founder and Partner of Future Ventures, an early-stage venture capital firm whose founders have generated over \$100 billion in value creation.⁵⁶

If an investor tries to engage a startup – even one that has been operating for just a few months – on the importance of disability inclusion practices, it is too late. As Saenko said, “At that point, the company is just trying to survive. The founders are working 18-hour days and they are under a ton of pressure to perform. If you try to bring up disability inclusion then the answer you will get is, ‘Yeah, we will get to it when there is time. We are just trying to solve the problem in front of us right now.’”⁵⁷ Thus, the opportunity of an early stage investment fund is to build disability inclusion considerations into the DNA of a company before it is too late – specifically, before it becomes a compliance issue to be managed rather than an opportunity to drive value.

The first such effort is coming to market at the time of this paper’s publication. SmartJob LLC is a public benefit corporation designed to close the disability wealth gap by making jobs “smarter” through expanding access to investment, financial services, and technology, and by improving public policy. According to Gina Kline, Founder and CEO, “SmartJob will provide links for investors and donors to investment and philanthropic opportunities in the disability employment space that, until now, have remained largely invisible.”

SmartJob will enable people with disabilities to access capital, operational support, and technology products to gain meaningful employment, whether by starting a small business, launching a micro-enterprise, or improving access to banking and financial services. In so doing, SmartJob will link people with disabilities with the capital, resources, and expertise needed to launch businesses of all kinds – all with the vision of achieving competitive, integrated employment and permanently answering the all-important “Then what?” question.

Part 5: Looking Ahead

Imagine, for a moment, the transformation that would occur across society if the next Google, Tesla, or Alibaba was built from the ground up with disability inclusion demonstrated as the ingredient most consequential to its success.

Or, a Biden Administration uses public policy to advance a more robust ESG agenda that fully incorporates disability inclusion considerations.

Or, some of the most powerful and influential investors in the world – such as Larry Fink of BlackRock, Jamie Diamond of JPMorgan Chase, Allison Lee of Cowboy Ventures, and Marcie Frost of CalPERS – unite in a push for competitive, integrated employment, in their own organizations and in the companies in which they invest.

Those visions of success are within reach of the disability community.

2020 has provided a unique moment in time in which the disruption we face is an opportunity for a better future. The traits that have made so many people with disabilities successful as entrepreneurs, employees, and leaders are the very traits so many companies are searching for in their workforce. For once, the way in which society works has adapted to the way the disability community works.

Equally important, the disability community has all the ingredients it needs to accelerate the realization of competitive, integrated employment: connections to the most influential investors, a proven track record of engaging in the policy process, an ability to engage corporate executives, and the ability to mobilize a campaign to achieve change.

It is now incumbent on the disability community to quickly apply its many assets in engaging the investor community to ensure that the value proposition of disability inclusion is fully understood. Investors are eager to collaborate and willing to more aggressively push disability inclusion into ESG considerations, but engagement by the disability community is critical to spurring them to action.

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⁵⁰ Interview with Carol Nolan Drake, Founder and CEO, Carlow Consulting, LLC, October 12, 2020.

⁵¹ Interview with Abraham McAllister, Managing Director, Index Plus, October 1, 2020.

⁵² Sample metrics derived from interviews with experts, including: Carol Nolan Drake, Cara Elizabeth Yar Khan, Kathleen Martinez, Dr. Susanne Bruyère, Gina Kline, and the methodology of the Washington Group on Disability Statistics: washingtongroup-disability.com

⁵³ Proxy season generally runs from late April to mid June each year.

⁵⁴ "ISS Published Proposed Benchmark Policy Changes for 2021," jdsupra.com, October 19, 2020.

⁵⁵ Interview with Eddie Ndopu, UN SDG Advocate, November 16, 2020.

⁵⁶ Interview with Maryanna Saenko, Co-founder and Partner, Future Ventures, October 28, 2020.

⁵⁷ Ibid.