

# Navigating Inclusion:

## A Framework for AI-Driven Hiring Efforts

November 14, 2024

# Access Live Captions

- Live **human-typed captions** are being provided for this meeting.
- **Access the captions via this URL** (launches in web browser window):
  - <https://das.1capapp.com/event/18172>



# Welcome from NILG



**Alicia Wallace**

NILG Board Member  
Associate Director – Affirmative Action and  
EEO Compliance , Eli Lilly and Company



**Kevin Fitzpatrick**

NILG Board Member  
Senior Compliance Manager  
PepsiCo

# Topics

- **Welcome from ODEP**
- **Overview of the AI & Inclusive Hiring Framework**
  - Why did ODEP & PEAT develop the Framework?
  - What is included in the Framework?
  - How can the AI & Inclusive Hiring Framework help employers advance inclusive hiring practices?
- **A Conversation with NILG about the Framework**
- **Audience Q&A and Resources**



# Welcome from ODEP



## Taryn Mackenzie Williams

Assistant Secretary of Labor for Disability  
Employment Policy  
U.S. Department of Labor, ODEP

**The U.S. Department of Labor's Office of Disability Employment Policy (ODEP) funds the Partnership on Employment & Accessible Technology (PEAT).**

PEAT's mission is to foster collaborations that make emerging technologies accessible, to support workplaces in using inclusive technologies that engage the skills of employees with disabilities, and to build a future that works.



# Overview of the AI & Inclusive Hiring Framework



**Bill Curtis-Davidson**  
Director, PEAT



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# AI & Inclusive Hiring Framework

## AI & Inclusive Hiring Framework

Make your artificial intelligence-powered hiring technology more inclusive for disabled job seekers.



- **Offers employers practices they can voluntarily adopt** to help them consider disability inclusion and accessibility in their AI-powered hiring efforts.
- **Aims to help employers better understand the unique accessibility and disability inclusion issues** that will help them when they are purchasing and using AI-powered hiring technology.
- **Provides real, actionable ways employers can use AI tools** to open the virtual door to recruit more workers with and without disabilities.



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# Where AI Can Be Used in Hiring





# Potential Risks of AI Hiring Tools

## Benefits<sup>1</sup>

Generating Job Descriptions

Efficiently Reviewing & Screening Resumes

Communicating with Applicants During the Interview Process

Identifying Suitable Candidates

## Potential Risks<sup>2</sup>

Use of ableist, gendered, or other biased language; reflecting requirements that are not job-related.

Relying on popularity metrics or inferred associations that are unfair to underrepresented job seekers.

Relying on analysis of physiological data (e.g., speech patterns, facial expressions, perceived emotional intelligence).

Inferring or predicting employability based on legacy data that fails to consider diverse candidates including those with disabilities.

# How Framework was Developed

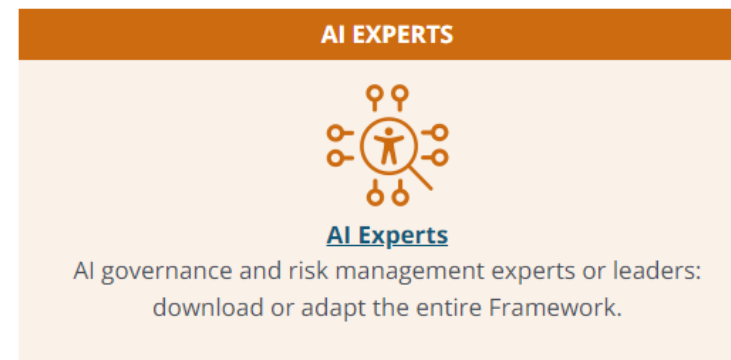
- **ODEP worked with NIST and assembled a core team of experts** across government, disability advocacy, civil society, industry, and AI ethics to work on the AI & Inclusive Hiring Framework asynchronously and during biweekly meetings.
- **ODEP & PEAT hosted listening sessions** with more than 50 disability advocates, civil society leaders, responsible AI specialists, employers, developers, legal experts, hiring platform representatives, and public policy leaders to collect input on the potential impacts of AI hiring technology on people with disabilities.
- **ODEP & PEAT also hosted an online dialogue with the public** on how AI hiring technology could impact people with disabilities.
- **Learn more** on PEAT's [How This Framework Was Developed](#) page.

# Role-Based Guidance



**Role-based “Get Started” landing page to help employers dive into the resource while:**

- Pacing themselves
- Focusing on their unique organizational needs
- Skipping around
- Discover more as they adopt and use the Framework



# 10 Focus Areas



**1. Identify Legal Requirements**



**2. Establish Staff Roles**



**3. Inventory Technology**



**4. Work with Vendors**



**5. Assess Impacts**



**6. Provide Accommodations**



**7. Use Explainable AI**



**8. Ensure Human Oversight**



**9. Manage Incidents**



**10. Monitor Regularly**



**Note:** Employers can voluntarily adopt practices, goals, and activities at their own pace. Using this AI & Inclusive Hiring Framework will be a progressive effort and will evolve over time as an employer's AI operation grows.

# Example Focus Area

## Focus Area 2: Establish Roles, Responsibilities, and Training

- Consider roles and responsibilities.
- Establish a culture of accountability with proactive engagement and training.
- Encourage groups – including DEIA – to collaborate in a way that supports an inclusive workplace culture.



## Key Practices

The following practices outline goals, documentation and sample activities you can implement in this Focus Area, mapped to NIST AI RMF subcategories. Select each one (using your mouse or the ENTER key) to expand or collapse each practice.

+ Outline Organizational Roles and Responsibilities

+ Train Staff and Contractors

+ Engage With Leadership

+ Make Decisions With a Diverse Team

+ Plan Deployments With a Diverse, Interdisciplinary Team



# Example Focus Area, Cont'd

## Focus Area 2: Establish Roles, Responsibilities, and Training

- Consider roles and responsibilities.
- Establish a culture of accountability with proactive engagement and training.
- Encourage groups – including DEIA – to collaborate in a way that supports an inclusive workplace culture.



### — Make Decisions With a Diverse Team

Relates to NIST AI RMF Govern 3.1

**Goal:** Create and maintain an inclusive workplace culture<sup>7</sup> that promotes diverse roles, competencies, skills, and an organizational capacity for AI hiring technology risk management.

- Documentation and resources: inclusive hiring practices; inclusive workplace policies and procedures
- Sample activities:
  - Establish inclusive hiring policies and practices to ensure that people from diverse demographics, disciplines, and backgrounds are involved in AI risk management.
  - Support an inclusive workplace that empowers diverse teams to add new insights into existing practices, communicate concerns, and provide feedback without fear of punishment.
  - Involve disabled people with lived experiences in every aspect of this process and throughout your organization.

# Appendix 1 Example



**Appendix 1:**  
Practices by Role



**Appendix 2:**  
Practices by Focus  
Area



**Appendix 3:**  
Impact  
Assessment



**Appendix 4:**  
GenAI  
Intersections

## — Human Resources (HR), Hiring Managers, and DEIA Practitioners

Below are some practices that HR, hiring managers, and DEIA (diversity, equity, inclusion, and accessibility) practitioners may cover—and be accountable/responsible for or be consulted about within an organization. Use these as starting points as you implement this resource.

[\*Learn more about HR, hiring managers, and DEIA practitioners in the AI & Inclusive Hiring Framework.\*](#)

- **Focus Area 1** (Identify Legal Requirements)
  - [Identify legal and regulatory requirements](#) (responsible [employment nondiscrimination])
- **Focus Area 2** (Establish Staff Roles)
  - [Train staff and contractors](#) (responsible and accountable)
  - [Make decisions with a diverse team](#) (responsible)
  - [Plan deployments with a diverse, interdisciplinary team](#) (responsible)
- **Focus Area 3** (Inventory Technology)
  - [Develop policies and practices for inventorying AI hiring technology](#) (consulted)
  - [Outline the context for using the technology](#) (responsible and accountable)
  - [Define targeted application scope](#) (responsible)
- **Focus Area 5** (Assess Impacts)

# Appendix 2 Example



**Appendix 1:**  
Practices by Role



**Appendix 2:**  
Practices by Focus  
Area



**Appendix 3:**  
Impact  
Assessment



**Appendix 4:**  
GenAI  
Intersections

## Focus Area 2: Establish Roles, Responsibilities, and Training

In this Focus Area, you will consider the roles and responsibilities your organization needs to maximize the benefits and manage the risks of using AI hiring technology. You will establish a culture of accountability with proactive engagement and training. You will encourage groups to collaborate while you engage internal staff in DEIA (diversity, equity, inclusion, and accessibility)-based roles to deploy AI hiring technology in a way that supports an inclusive workplace culture<sup>7</sup>.



Focus Area 2 practices mapped to NIST AI RMF subcategories:

- Outline organizational roles and responsibilities (relates to NIST AI RMF Govern 2.1)
- Train staff and contractors (relates to NIST AI RMF Govern 2.2)
- Engage with leadership (relates to NIST AI RMF Govern 2.3)
- Make decisions with a diverse team (relates to NIST AI RMF Govern 3.1)
- Plan deployments with a diverse, interdisciplinary team (relates to NIST AI RMF (Map 1.2))

# Using the Framework

- **Organizations are at varying stages of AI adoption, including how they might be using AI for recruitment and hiring practices.**
  - We encourage employers to approach the focus areas in the order that align with their own adoption of AI practices.
  - Recognizing that AI adoption happens over time, we want employers to use elements of the Framework in the order and pace that works for each organization.
- **Employers can voluntarily use the Framework to help them maximize benefits and manage risks to open the door to recruit more workers with and without disabilities.**
  - Employers (and developers/vendors) who have adopted NIST AI RMF should be able to align these practices with their other AI Governance / Risk Management practices.



# A Conversation with NILG about the Framework



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# Audience Q&A



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# Ask Us a Question

- Use the “**raise hand**” feature in **Zoom** and, when called upon, please ask your question.
- Enter a **question in the chat** and moderators will answer (time permitting).



# Resources & Contact

- **PEAT AI & Inclusive Hiring Framework:**  
[www.peatworks.org/ai-inclusive-hiring-framework/](http://www.peatworks.org/ai-inclusive-hiring-framework/)
- **News Release on the Framework:**  
[bit.ly/m24-peat-ai-inclusive-hiring-framework](http://bit.ly/m24-peat-ai-inclusive-hiring-framework)
- **Contact PEAT:** [hello@peatworks.org](mailto:hello@peatworks.org)





# NILG 2025 National Conference

The Conference is the premier meeting ground for EEO, affirmative action, HR compliance, DEI and ESG representatives. Practitioners from business, educational institutions, government and not-for-profit organizations attend this annual conference to hear from recognized experts as well as from leaders at federal agencies such as the Equal Employment Opportunity Commission (EEOC) and the Office of Federal Contract Compliance Programs (OFCCP)



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2025

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