



Study on the Current Status and Issues of Employment Measures for Persons with Disabilities in Foreign Countries

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[Keywords]

Foreign countries
Employment measures for persons with disabilities
Employment of persons with disabilities
United States
United Kingdom
Germany
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Employment rate system
Reasonable accommodation
Supported employment
Subsidy

[Abstract]

This report is a compilation of the results of the “Study on the Current Status and Issues of Employment Measures for Persons with Disabilities in Foreign Countries,” which was conducted in response to a request from the Ministry of Health, Labour and Welfare (MHLW) as a two-year project from 2024 to 2025.

This study summarizes the characteristics, achievements, and strengths of employment measures for persons with disabilities in Japan, based on “Research on Trends of Vocational Rehabilitation Systems and Services in Foreign Countries” published by the National Institute of Vocational Rehabilitation in March 2023, as well as by confirming the latest initiatives in the United States, the United Kingdom, Germany, and France, and by clarifying specific employment measures for persons with disabilities and their achievements in comparison with those in Japan.

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2 Research period

FY 2024 to 2025

3 Composition of the research report

Part 1 Comparison of Employment Measures for Persons with Disabilities in Japan and Foreign Countries

Chapter 1 Background, Purpose, and Methods of the Research

Chapter 2 Comparison of Basic Status of Employment Measures for Persons with Disabilities

Chapter 3 Persons with Mild to Severe Disabilities Who Are Eligible for Employment Support

Chapter 4 Securing Inclusive Workplaces Where Persons with Disabilities Can Thrive

Chapter 5 Specialized Support Systems and Services That Meet Diverse and Individual Support Needs

Chapter 6 Results of The Research and Future Challenges

Part 2 Employment Measures for Persons with Disabilities in Japan and Foreign Countries

Chapter 1 Employment Measures for Persons with Disabilities in the United States

Chapter 2 Employment Measures for Persons with Disabilities in the United Kingdom

Chapter 3 Employment Measures for Persons with Disabilities in Germany

Chapter 4 Employment Measures for Persons with Disabilities in France

Chapter 5 Employment Measures for Persons with Disabilities in Japan

4 Background and purpose of the research

In response to a request from the Ministry of Health, Labour and Welfare (MHLW), this research was conducted between FY 2024 to 2025 as the “Study on the Current Status and Issues of Employment Measures for Persons with Disabilities in Foreign Countries.”

In a report submitted at the 123rd session of the Subcommittee on Employment of Persons with Disabilities, Labor Policy Council on January 18, 2023, “Based on the “Enhancement and Strengthening of Future Employment Measures for Persons with Disabilities” compiled on June 17 last year, the Government should start studying the employment rate system for persons with disabilities at an early stage, with a view to setting the next employment rate for persons with disabilities and revising the system in the future.” In order to examine the ideal employment policies for persons with disabilities in the future, it is necessary to confirm the efforts in the United States, the United Kingdom, Germany, and France (hereinafter referred to as “foreign countries”), clarify Japan’s strengths, and grasp information on the systems common to foreign countries. For this reason, this research was conducted based on the “Research on Trends of Vocational Rehabilitation Systems and Services in Foreign Countries” published by the National Institute of Vocational Rehabilitation in March 2023. It was intended to confirm the latest efforts in foreign countries, clarify specific measures and the results related to the persons with disabilities who are eligible for employment support in foreign countries, the securing of inclusive workplaces where persons with disabilities can thrive, and the specialized support systems and services that address diverse and individual support needs, aiming to organize the characteristics, outcomes, and strengths of Japan’s employment measures for persons with disabilities through comparison between Japan and these foreign countries.

5 Methods

The Research Committee was established and operated consisting of experts in the field of vocational rehabilitation and laws concerning employment of persons with disabilities in each country. In addition, in order to compare the status of employment measures for persons with disabilities between Japan and foreign countries, a comparative common framework (table below) was established based on the viewpoints and efforts of each country. In addition, the efforts of foreign countries were clarified through systematic information organization and mutual comparison.

Table: Comparative Common Framework

Framework	Point of view
Persons with Mild to Severe Disabilities Who Are Eligible for Employment Support	• Working-age population by type and degree of disability • Scope of persons with disabilities eligible for employment support • Scope of persons with disabilities requiring focused employment support • Understanding the interaction between employment prospects for people with disabilities and accommodation/support
Securing inclusive workplaces where diverse persons with disabilities can thrive	• Employment status of persons with disabilities in diverse ways of working • Numerical targets and employment promotion measures such as the employment rate system for persons with disabilities • Improvement of the quality of employment for persons with disabilities and its evaluation indicators • Cooperation between employment promotion for persons with disabilities and welfare systems (transition from welfare workshop to general employment, etc.)
Specialized support systems and services that meet diverse and individual support needs	• Support systems and services for persons with disabilities and employers • Support for persons with disabilities and employers based on accumulated expertise • Implementation method for comprehensive support in medical care, welfare, education, employment, etc. • Human resource development and system development for vocational rehabilitation

6 Summarized results of the study and discussion

This research report consists of two parts. The first part comprehensively confirmed the efforts of Japan and foreign countries in line with the comparative common framework mentioned above. The second part written by the members of the Research Committee organized in detail the employment measures for persons with disabilities in Japan and foreign countries, including historical changes.

(1) Comparison of Employment Measures for Persons with Disabilities in Japan and Foreign Countries (Part 1)

A. Comparison of Basic Status of Employment Measures for Persons with Disabilities (Part 1, Chapter 2)

The study outlined the basic situation such as transition of employment measures for persons with disabilities and the status of employment for persons with disabilities by comparing the situation of foreign countries with that of Japan.

Employment measures for persons with disabilities began with measures for disabled veterans after World War II, and in recent years, measures for persons with mental disabilities have become a common challenge. According to the International Classification of Functioning, Disability and Health (ICF)

adopted by World Health Organization (WHO) in 2001, disability is not a concept that distinguishes specific types of disability (physical disability, mental disability, etc.), but is instead a comprehensive concept that relates to the interaction between health conditions (including chronic diseases) and environmental factors. Each country is evolving employment policies based on reasonable accommodation. As for the definition of persons with disabilities, the United States places importance on restrictions on daily activities, the United Kingdom places importance on long-term effects on the ability to perform daily activities for 12 months or more, and Germany and France emphasize restrictions on social participation.

Working styles include social employment and welfare workshop in addition to general employment. Supported employment is progressing in various countries, including Japan, and transition to general employment is being promoted. Japan and other countries place prohibition of discrimination and reasonable accommodation in the legal framework. In Germany and France, levies are used to supplement wages and provide support for workplace adjustment. In the United Kingdom, levies are used to subsidize workplace adjustment costs. In the United States, tax deductions and counseling services are provided. In Japan, levies are used to provide subsidies. In some countries, payment systems, subsidies, and tax incentives have been developed to reduce the burden on companies, and support equipment and assistance costs for persons with disabilities are guaranteed. The vocational rehabilitation system and the training of job coaches have progressed, and cooperation with medical care and education is also an important challenge.

B. Persons with Mild to Severe Disabilities Who Are Eligible for Employment Support (Part 1, Chapter 3)

The study verified the transition of disability concepts, and confirmed the interaction between functional disability, job content, and reasonable accommodation regarding disabilities in workplaces. In addition, methods for recognizing persons with disabilities who need support and international initiatives were organized.

The Convention on the Rights of Persons with Disabilities positions “disability” as an “evolving concept” through interaction with society and the environment. After World War II, employment measures for persons with disabilities focused on measures for disabled veterans, but have expanded in scope to include persons with intellectual disabilities, persons with mental illnesses, and persons with chronic diseases. The focus has shifted from medical care and welfare to the right to work and employment, and the prohibition of discrimination and reasonable accommodation have been emphasized.

Since the 2000s, the perception that employment is difficult for persons with disabilities has given way to an understanding that accommodation is necessary for their active participation, and even persons with mild disabilities have also been subject to reasonable accommodation and prohibition of discrimination against persons with disabilities. In foreign countries, subsidy systems have been

developed to reduce the burden on companies. In the United States, under the framework of the Americans with Disabilities Act (ADA), in addition to providing information to promote reasonable accommodation, there are also tax incentives for hiring people who are eligible for vocational rehabilitation programs. The United Kingdom requires reasonable adjustments under the Equality Act 2010 and covers the cost of providing reasonable adjustments through the Access to Work (AtW) grant. In principle, Germany's subsidies and employment quota system are applied to persons with a disability level of 50 or more, and sheltered workshops are also established. In France, Recognition of the Status of Disabled Worker (RQTH) takes into account support needs, and combines sheltered workshops such as work support service providers (Établissements et services d'accompagnement par le travail, ESAT) with general employment.

Furthermore, as support for persons with disabilities whose needs place a large burden on companies, even with reasonable accommodations in place, the United States has introduced Individual Placement and Support (IPS) and Customized Employment. The United Kingdom has implemented individual placement and support for people with mental illness. Germany provides wage compensation subsidies, and France introduces a program on burden assessment and continuation of subsidies, based on productivity differentials. Common across countries are certification systems that combine medical confirmation with assessment of support needs, promotion of self-reporting, and mechanisms for prevention of discrimination.

C. Securing Inclusive Workplaces Where Persons with Disabilities Can Thrive (Part 1, Chapter 4)

The situation of foreign countries' responses to secure "inclusive workplaces" for persons with mild to severe diverse disabilities was confirmed.

Foreign countries promote the formation of inclusive workplaces by setting employment quota (Germany, France) and incentives (United States, United Kingdom). Regarding employment rate systems for persons with disabilities, Germany (5%) and France (6%) set higher statutory employment rates than Japan (2.5%, *April 2024 – June 2026), and impose a graduated payment to companies that fail to achieve the targets, according to the employment rate and company size, using the funds to provide employment support. However, since the criteria for certification of persons with disabilities and the scope of their eligibility differ from country to country, it is difficult to evaluate them by simple numerical comparisons. When the review is conducted, it is necessary to take into account the differences in the design and operation of the system from country to country. The United States, on the other hand, does not impose a legal employment obligation on companies, but emphasizes reasonable accommodation and non-discrimination. Private companies that contract with the federal government set a target of 7% for the employment of persons with disabilities, while the federal government sets a target of 12%. This is an affirmative action targeted effort, and no penalties or fines are imposed even if the target is not met. The United Kingdom has abolished the statutory employment rate and aims to increase employment across the country.

In Japan, efforts have been made to increase the number of employed persons with disabilities, but in recent years prohibition of discrimination, provision of reasonable accommodation, and improvement of the quality of employment have also become important challenges. The United States has made reasonable accommodation mandatory under the Americans with Disabilities Act (ADA), and has developed a mediation and litigation system by the Equal Employment Opportunity Commission (EEOC) and an information provision system by the Job Accommodation Network (JAN). The United Kingdom stipulates comprehensive prohibition of discrimination under the Equality Act, and evaluates companies' initiatives by the "Disability Confident" certification system. With regard to reasonable accommodation, Germany stipulates in its law that employers ensure the provision of appropriate measures for persons with disabilities to find work suitable for their disabilities on an ongoing basis as much as possible. France obligates reasonable accommodation as "appropriate measures" and requires companies to designate persons in charge of employees with disabilities. The countries are promoting reasonable accommodation as a low-cost productivity improvement measure, emphasizing self-reporting and ensuring digital accessibility.

Cooperation between employment measures and welfare measures is essential for promoting general employment of persons in need of intensive work support, and the supported employment model is an internationally influential tool. The United States legislated Competitive Integrated Employment under the principle of "Employment First," while the United Kingdom abolished sheltered employment and is shifting to supported employment. Germany and France are pursuing reforms to increase inclusiveness while preserving social employment. Although the general opinion of the Committee on the Rights of Persons with Disabilities expressed a negative view on sheltered workshops, some countries recognize a certain role in the current situation where general employment is difficult. In addition to promoting direct employment of those in need of intensive employment support, the common challenge is to provide wage compensation and support for the transition to employment.

D. Specialized Support Systems and Services That Meet Diverse and Individual Support Needs (Part 1, Chapter 5)

Employment support for persons with disabilities is not limited to individual support before employment, but is also focused on ensuring reasonable accommodation and continuous support in life and medical care for both companies and persons with disabilities after employment. In Japan, the employment rate system for persons with disabilities is centered on the levy and grant system for employing persons with disabilities in order to adjust the economic burden associated with employment of persons with disabilities, and comprehensive support is provided by public employment security offices, local vocational centers for persons with disabilities, etc.

In foreign countries, it is common for companies to make reasonable accommodation their responsibility; however, any amount exceeding the excessive burden for companies will be covered by public subsidies. The United States mandates reasonable accommodation under the Americans with

Disabilities Act (ADA), and JAN provides a low-cost solution. In Germany, the Central and Independent Information Service (REHADAT) systematizes information and experts are involved in the grant process. The United Kingdom provides financial assistance for the cost of reasonable accommodation through the AtW grant, while companies are required to bear the cost according to their size. France provides subsidies based on disability severity certification.

In addition, comprehensive support through cooperation among medical care, welfare, education, and employment has developed in each country. Cooperation with medical institutions and utilization of local resources are emphasized in employment support for persons with mental disabilities and those with chronic disease. It is also important to disseminate the supported employment model and systematize knowledge on reasonable accommodation. Common challenges are optimization of corporate burdens, dissemination of reasonable accommodation, and establishment of a cross-sectoral support system.

(2) Employment Measures for Persons with Disabilities in Japan and Foreign Countries (Part 2)

A. United States (Part 2, Chapter 1)

In the United States, rather than limiting the scope of “persons with disabilities,” the scope of support, the workplace, and the support system have been interlinked and integrated under the concept of “How can systems and workplaces be designed to create conditions for everyone to work.”

Specifically, first, the system maintains a broad scope of eligibility by setting the criteria for accepting people with disabilities not on medical diagnoses or the possession of a certificate, but rather on functional difficulties in the workplace and the potential for those difficulties to be improved through support. Second, the concept of “severity” in the priority program of the vocational rehabilitation system in the United States is understood not as medical grade but as “impact on multiple functional areas” and “amount of support required,” and is reflected in the allocation of resources. Third, the government has redesigned jobs and workplaces to ensure the “quality of employment,” such as retention, promotion, equal pay, and accessibility in the system operation. Fourth, medical care, welfare, employment, social security programs, and financial resources are integrated in the system to support continuation that allows people with disabilities to stop and resume work once they start working.

B. United Kingdom (Part 2, Chapter 2)

In the United Kingdom, disability is defined not by diagnosis but by “whether there is a substantial and long-term disadvantage in daily life or employment,” so that the number of people who fail to receive support can be reduced. Companies are required to clearly stipulate in their internal rules the procedures for reasonable adjustment, which consist of starting a dialogue based on the individual’s request, reaching an agreement, implementing the adjustment, and reviewing it, with the period and recording formats also specified, ensuring the process from identification to implementation by operation. In addition, a doctor’s record such as “under what conditions the individual can work” and a health adjustment passport that organizes and shares the necessary accommodation needed for the

individual are used to connect the stages of job-seeking, starting work, and being employed. People with the most severe disabilities are not regarded as “unable to work” in a fixed manner, but as requiring high-intensity employment support, and while workplace adjustments and costs are secured through supported employment, a safety net is ensured through individual self-reliance benefits, thereby expanding the option to “trial employment.”

With regard to the design of inclusive work, it is possible to apply for flexible working from the first day of employment, and discuss and decide within two months, in principle. The standard procedure clarifies matters such as telework (work from home), staggered working, and gradual return to work according to the agreed format. On the cost side, the AtW program provides subsidies for additional parts that exceed reasonable adjustments, such as support personnel, equipment, commuting, and mental health support (it does not replace the company’s legal obligations). Companies establish internal regulations requiring the implement of adjustments in advance and reimbursement after the government’s approval, realizing a “no waiting” approach to the provision of adjustments. At the same time, companies redesign the work under the supported employment model and provide integrated support from before employment to job retention and promotion in rank.

C. Germany (Part 2, Chapter 3)

In Germany, persons with disabilities subject to the employment rate system for persons with disabilities are, in principle, “persons with a disability level of 50 or more (Schwerbehinderte. In this chapter, they are referred to as ‘persons with severe disabilities.’).” However, even those with a disability level of 30 or more but less than 50 who have difficulty in finding employment or continuation of work are certified as persons who receive the same treatment as individuals with a disability level of 50 or more (certification of equivalent status), who are subject to the employment rate system for persons with disabilities. Vocational rehabilitation covers a wide range of topics, including employment support and supported employment by the “Federal Employment Agency,” an employment security agency, and support by job coaches, as well as grants to employers and reimbursement of expenses (e.g. employment of support staff, etc.) for workers with disabilities. Vocational rehabilitation is not only for persons with severe disabilities but also for persons with disabilities in general. There are also the “Integration Offices” that provides employment support for persons with severe disabilities (and those equivalent to them) and the “Integration Specialist Service” that provides support to persons with severe disabilities in particular who require accompanying support on commission from the Integration Office, etc. In addition, in relation to persons with severe disabilities who have difficulty being employed in the general labor market, opportunities for working in sheltered workshops for persons with disabilities are provided. This is also included in vocational rehabilitation.

D. France (Part 2, Chapter 4)

In France, persons with disabilities who are subject to the employment rate system for persons with disabilities are mainly those who have been granted Recognition of the Status of Disabled Worker

(RQTH). Support for persons with disabilities includes support provided by the Prefectural Center for Persons with Disabilities, which is a one-stop contact for persons with disabilities; support provided by Cap Emploi, which provides job counseling and placement services, and follow-up after employment; ESAT, which provides sheltered workshop; and support groups for each disability. Companies engaged in the employment of persons with disabilities are provided with financial support to compensate the company's expenses based on the "Reconnaissance de la lourdeur du handicap (RLH)," a French mechanism linked to wage subsidies for employers employing persons with severe/significant disabilities, while the persons with disabilities are provided with support such as supported employment. Persons with disabilities also obtain employment opportunities through disability-inclusive companies and employment support providers and services. And the prefectural center for persons with disabilities has a team of experts in many fields such as medical care, welfare, education, and labor. They create support plans for persons with disabilities. The support plans are approved by the Commission for the Rights and Autonomy of Persons with Disabilities, which consists of representatives of concerned parties in the region. Based on the plan, the expert team provides support for various persons with disabilities.

E. Japan (Part 2, Chapter 5)

In Japan, persons with disabilities subject to the employment rate system for persons with disabilities, in principle, hold certificates, but the scope of persons with disabilities subject to vocational rehabilitation covered by the Act on Employment Promotion of Persons with Disabilities is broader. Vocational rehabilitation institutions are public employment security offices, vocational centers for persons with disabilities, and Work/Life Support Centers for Person with Disabilities. Support measures for employers include financial support such as the provision of various subsidies, personnel support such as by job coaches, and tax incentives. For persons with disabilities who have difficulty finding employment at general companies, support for the transition from welfare workshop to general employment is being strengthened. Measures for cooperation among related organizations include "team support" at public employment security offices in the employment field, and in the welfare field, in addition to the social welfare council, "employment choice support" launched in 2025.

(3) Discussion (Part 1, Chapter 6)

A. Findings of the Study

In this research, information was collected by experts and discussions were conducted in the Research Committee in order to sort out the characteristics and results of Japan's employment policies for persons with disabilities and to grasp the efforts of other countries to contribute to solving Japan's problems. Japan's strengths include the development of comprehensive measures not seen in other countries, such as continuous support by Work/Life Support Centers for Person with Disabilities, and the accumulation of know-how by corporate and regional supporters. The employment rate of persons with disabilities is also relatively high, compared only to the United States though.

Different countries have different systems for determining the degree of disability and severity of disabilities, and mechanisms to provide financial support while reducing the burden on companies are also observed. In terms of improving the quality of employment, benchmarking by the Disability Equality Index in the United States and the “Disability Confident” certification system in the United Kingdom are drawing attention. Regarding the levy system for employing persons with disabilities, different systems from Japan were identified such as the system in France set by company size, and the progressive increase system in Germany. In terms of strengthening cooperation with the welfare field, the report also confirmed Germany’s system that promotes the transition to general employment and that combines wage compensation with accompanying support for persons with disabilities. In the future, it is expected that the results of this study will be utilized in the consideration of employment policies for persons with disabilities in Japan.

B. Future Challenges

This study summarized the situation of foreign countries mainly by document investigation, and compiled it into a report based on the findings of the Research Committee members. However, there were some issues that could not be summarized because of limitations of information that can be collected from the literature, as described below. Awareness of inclusive employment of persons with disabilities is growing worldwide, and employment policies for persons with disabilities in each country are expected to change in an ongoing manner in the future. Therefore, it is necessary to continuously monitor the findings of this research. In doing so, it is also desirable to clarify the following issues that have not been resolved in this research.

- Regional level (good examples of comprehensive support for employment of persons with disabilities by states and local governments, and efforts to address regional disparities)
- Comparison of the population with disabilities and their employment rates in countries other than Japan and the United States
- Support for students with disabilities in their transition to employment
- Specific utilization status and effects of systems in foreign countries
- Specific examples of vocational rehabilitation in foreign countries (e.g. support for employers, support for persons with disabilities: accompanying employees for interviews, support for on-the-job training, etc.)

7 Relevant research outputs

- Research on Trends of Vocational Rehabilitation Systems and Services in Foreign Countries, Research Report No. 169, 2023
- Research on the Actual Practice of Disability Certification and Determination of Difficulty in Working in Foreign Countries ~ Initiatives in France and Germany, Research Report No. 154, 2020