Affirmative Action Plan for the Recruitment, Hiring, Advancement, and Retention of Persons with Disabilities

To capture agencies' affirmative action plan for persons with disabilities (PWD) and persons with targeted disabilities (PWTD), EEOC regulations (29 C.F.R. § 1614.203(e)) and MD-715 require agencies to describe how their affirmative action plan will improve the recruitment, hiring, advancement, and retention of applicants and employees with disabilities.

Section I: Efforts to Reach Regulatory Goals

EEOC regulations (29 CFR §1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with disabilities and persons with targeted disabilities in the federal government.

- 1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - a. Cluster GS-1 to GS-10 (PWD)b. Cluster GS-11 to SES (PWD)AnswerNo

*For GS employees, please use two clusters: GS-1 to GS-10 and GS-11 to SES, as set forth in 29 C.F.R. § 1614.203(d)(7). For all other pay plans, please use the approximate grade clusters that are above or below GS-11 Step 1 in the Washington, DC metropolitan region.

- 2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.
 - c. Cluster GS-1 to GS-10 (PWTD) Answer No d. Cluster GS-11 to SES (PWTD) Answer No

Grade Level Cluster (GS or Alternate Pay Plan)	Total #	Reportable Disability 12% - #	Reportable Disability 12% - %	Targeted Disability 2% - #	Targeted Disability 2% - %
Numerical Goal	*	*	*	*	*
Grades GS-1 to GS-10	5202	1420	27.30	188	3.61
Grades GS-11 to SES	13874	3394	24.46	364	2.62

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters. Through agency-wide publication of the FY 2021 Annual EEO Program Status Report (MD-715). 2. In ad hoc training sessions delivered by HCT and OEOI on non-competitive hiring authorities for persons with disabilities. 3. During recruitment strategy discussions with managers which discussed the use of both competitive job announcements and non-competitive options like Schedule A for people with disabilities and 30% or more disabled veterans. 4. During the state of the agency briefing to senior leadership on September 27, 2022.

Section II: Model Disability Program

Pursuant to 29 C.F.R. § 1614.203(d)(1), agencies must ensure sufficient staff, training, and resources to recruit and hire persons with disabilities and persons with targeted disabilities, administer the reasonable accommodation program and special emphasis program, and oversee any other disability hiring and advancement program the

agency has in place.

A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR THE DISABILITY PROGRAM

1. Has the agency designated sufficient qualified personnel to implement its disability program during the reporting period? If "no", describe the agency's plan to improve the staffing for the upcoming year.

Answer Yes

2. Identify all staff responsible for implementing the agency's disability employment program by the office, staff employment status, and responsible official.

Disability Program Task	# Of FTE Staff by Employment Status-Full Time	# Of FTE Staff by Employment Status-Part Time	# Of FTE Staff by Employment Status- Collateral Duty	Responsible Official (Name, Title, Office Email)
Special Emphasis Program for PWD and PWTD	0	1	122	Morenike. Ogebe, D&I Supervisory EEO Specialist, OEOI <u>Morenike.ogebe@uscis.dhs.gov</u>
Processing applications from PWD and PWTD	0	84	0	Shannon Sarbo Branch Chief, Recruitment and Placement, HROC, HCT shannon.r.sarbo@uscis.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	0	84	0	Shannon Sarbo Branch Chief, Recruitment and Placement, HROC, HCT shannon.r.sarbo@uscis.dhs.gov
Processing reasonable accommodation requests from applicants and employees	6	0	50	Sandra M. Sutton DAP Supervisory. EEO Specialist, OEOI sandra.m.sutton@uscis.dhs.gov
Architectural Barriers Act Compliance	0	17	0	Katherine D. Williamson, Division Chief Facilities Management, MGMT katherine.d.williamson@uscis.dhs.gov
Section 508 Compliance	0	1	0	Ken Moser Branch Chief and Section 508 Coordinator <u>kenneth.s.moser@uscis.dhs.gov</u>

^{3.} Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If "yes", describe the training that disability program staff have received. If "no", describe the training planned for the upcoming year.

Answer Yes

In FY 2022, Disability Accommodation Program staff was trained on FMLA and reasonable accommodation law by the Federal Employment Law Training Group (FELTG).

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period? If "no", describe the agency's plan to ensure all aspects of the disability program have sufficient funding and other resources.

Answer Yes

Section III: Program Deficiencies in The Disability Program.

Brief Description of Program Deficiency

C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If "no", please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comment's column.

Objective

The agency revised its disability reasonable accommodation and personal assistance services procedures to comply with EEOC's regulations and guidance.

Target Date: 09/30/2021 **Completion Date:** 09/30/2021

Planned Activities

Target Date: 3/31/2021 **Completion Date:** 9/20/2021

Planned Activity: 1. OEOI will draft revised Reasonable Accommodation and Personal Assistance Services

procedures.

Target Date: 9/30/2021 **Completion Date:** N/A

Planned Activity: 2. OEOI will finalize revised Reasonable Accommodation and Personal Assistance Services

procedures.

Target Date: 9/30/2022 **Completion Date:** 10/30/2020

Planned Activity: 3. OEOI will research reasonable accommodation systems that are compliant with MD-715

reporting.

Target Date: 9/30/2021 **Completion Date:** 9/30/2021

Planned Activity: 4. OEOI will submit a proposal for funding approval to the OCFO and senior leadership for a new

reasonable accommodation tracking system to include funding needs.

Target Date: 9/30/2023 **Completion Date:** 9/30/2022

Planned Activity: 5. Secure source for new reasonable accommodation tracking system.

Target Date: 9/30/2023

Completion Date: N/A

Planned Activity: 6. Implement new reasonable accommodation tracking system.

Accomplishments

Fiscal Year Accomplishments 2022

- OEOI submitted updated procedures for reasonable accommodation and personal assistance services to the EEOC on September 20, 2021, which approved the procedures on April 21, 2022, so measures C.2.b and C.2.c were removed from the statement of program deficiency. The procedures and PAS are pending agency approval. Activity #2 was modified to reflect expected approval date.
- OEOI submitted an enhancement request to fund an accommodation tracking system. The request was approved for implementation in FY 2023. A SharePoint system is under development with anticipated implementation in FY 2023. Planned activities #5 and 6 were modified to account for USCIS staff developing the tracking system.

Fiscal Year Accomplishments 2021

Modifications: Modified deficiency statement, objective, and planned activities to include Part G C.2.b.5. and C.2.c. Added action plan #4 to better track actions taken towards the objective. Accomplishments: OEOI submitted an enhancement request to OCFO for funds to acquire an RA tracking system, but the request was not approved. OEOI also submitted revised RA and PAS procedures to the EEOC on September 20, 2021, that are pending review.

Objective

Implement a new Reasonable Accommodation tracking system that is equipped to calculate processing time frames.

Target Date: 09/30/2023 **Completion Date:** N/A

Section IV: Plan to Recruit and Hire Individuals with Disabilities

Pursuant to 29 C.F.R. $\S1614.203(d)(1)(i)$ and (ii), agencies must establish a plan to increase the recruitment and hiring of individuals with disabilities. The questions below are designed to identify outcomes of the agency's recruitment program plan for PWD and PWTD

A. PLAN TO IDENTIFY JOB APPLICATIONS WITH DISABILITIES

- 1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.
 - Leveraged collateral-duty special emphasis program managers (SEPMs) to conduct outreach and recruitment efforts with disability organizations and educational institutions and promoted and encouraged them to serve as recruiters for the Workforce Recruitment Program for College Students with Disabilities (WRP).
 - Continued to develop, update, and widely distribute recruitment materials at each recruitment outreach event to promote the use of special hiring authorities for persons with disabilities.
 - Encouraged hiring managers to use the Schedule A Hiring Authority prior to advertising positions and continued to refer disabled veterans' resumes to hiring managers to support veteran hiring goals.
 - Appointed a full time Selective Placement Program Coordinator (SPPC) assigned to Strategic Recruitment to act as a liaison between HR personnel, hiring managers, and applicants with disabilities.
 - Utilized several non-paid work experience programs to include Operation Warfighter (OWF) that match qualified wounded, ill and injured Service members with non-funded Federal internships, the VA Non-Paid Work Experience (NPWE) program that provides eligible veterans and service members with training and practical job experience, and the DoD SkillBridge Program encouraging service members to capitalize on training and development opportunities throughout their military career so they may grow and develop as professionals.

- Continued to recruit at diversity-focused career fairs, maintained rapport with local colleges and universities, collaborated with military installations, veteran's groups, and community organizations.
- Promoted the WRP in OEOI's Monthly Newsletter, SEPM training, and meetings with program offices and directorates. FY 2023 Plans
- Partner with employee associations to enhance our branding/marketing reach to underserved communities including persons with disabilities.
- Conduct outreach and employment related events to persons with disabilities to ensure we are meeting the established hiring goals.
- Conduct analysis on Schedule A conversions to limit the number of individuals converted untimely.
- Update the resources on the Inclusive Recruitment and Hiring Hub, for example, "How to use the Hub" video, and additional marketing is planned.
- Maintain outreach contacts with local Departments of Veterans Affairs, Vocational Rehabilitation Offices, local Disabled Veteran Organizations, Warrior Transition Units, Operation Warfighter, and other organizations that represent and serve disabled veterans.
- Increase the use of the Workforce Recruitment Program by providing hiring managers, resource managers and others involved in the hiring/recruiting process the link to the Workforce Recruitment Program and instructions on how register as an employer.
- Refer to the special hiring authorities as part of briefings when meeting with hiring managers and supervisors.
- Expand long standing partnership with the Virginia Department for the Blind and Vision Impaired (DBVI) and Virginia Department of Aging and Rehabilitative Services (DARS) and promote and solicit program offices to participate in DBVI and DARS Weekly Club Meetings.
- Create a disability article that highlights the disability partnerships, disability hiring goals, and other disability related information.
- 2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.
 - USCIS utilizes all available hiring authorities to recruit and hire PWD and PWTD, including Schedule A and the 30% or more disabled veteran's appointment authority. USCIS continued exceeding the 10% DHS goal for hiring veterans. As of the end of the Fiscal Year, veterans occupied 26.5% of the workforce of which 18.3.% were disabled veterans. There were 79 individuals hired using Schedule A during FY21 and 110 in FY22, a 39.24% increase.
 - Utilized delegated examining unit job announcements to allow managers to recruit from all sources, which
 created larger applicant pools to reach disabled veterans, Schedule A eligible, and other best qualified
 candidates.
 - Developed and launched an Inclusive Recruitment and Hiring Hub that assists hiring officials and senior leaders with recruitment and hiring resources such as use of Schedule A and other special hiring authorities.
 - Created and distributed resources to hiring officials and potential candidates on special hiring authorities and DEIA initiatives. Conducted nine
 - (9) recruitment and outreach activities for individuals with disabilities (IWD), including virtual events, webinars, panel talks, and information sessions on employment with USCIS.
 - Continued to use the Schedule A Hiring Mailbox to advise eligible applicants about how to apply.
 - Continued to encourage applicants to voluntarily self-identify if they have the types of disabilities covered by the programs via job announcements, job fairs, and hiring events.
- 3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Applicants eligible under special hiring authorities can:

- Use their status under a special hiring authority to apply to various job opportunity announcements on USAJOBS. Eligibility is determined by HR Specialists prior to referral to the hiring office, by reviewing documentation submitted to support the eligibility (Schedule A letter, VA letter, etc.).
- Submit applications to hiring offices, outside of a job announcement. If offices are interested in considering the individual, eligibility is determined by an HR Specialist after the office has seen the application. Eligibility is determined by HR Specialists using the submitted documentation (Schedule A letter, VA letter, etc.). Applicants using special hiring authorities are referred when:
- Applications accepted through job announcements are referred on a certificate of eligible through the applicant
 tracking system. Selections are made through these certificates and selectees are entered into the onboarding
 process in the applicant tracking system. Disability identification is obtained prior to entrance on duty (EOD),
 which is the first point in the process where the agency will collect information on the type of disability (including
 if it is a targeted disability).
- Applications submitted outside of USAJOBS may be sent directly to the hiring office by the applicant or based on connections made with the Disability Program Manager, Selective Placement Program Coordinator, or hiring event. Selections are made through direct communication between the hiring office and their HR Specialist. Selectees are entered into the onboarding process in the applicant tracking system as non-competitive selections. Disability identification is obtained prior to entrance on duty (EOD), which is the first point in the process where we will collect information on the type of disability (including if it is a targeted disability). The Veterans Employment Program Manager (VEPM) partnered with DHS and local military installations to provide employment workshops to transitioning service members and disabled veterans. In addition, USCIS also promoted non-paid work experience programs.
- The Selective Placement Program Coordinator partnered with Workforce Recruitment Program (WRP) Recruiter Program, the State and Federal Vocational Rehabilitation Programs, and DHS to provide individuals with disabilities more opportunities to prepare for, find, and maintain a job.
- 4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

Answer Yes

USCIS employs diverse methods to train and inform its supervisors and managers about the use of hiring authorities that take disability into account, including:

- Mandatory annual online training titled "Employment of People with Disabilities: A Roadmap to Success" for supervisors, managers, and HR professionals.
- Offering the following optional training geared toward supervisors, hiring managers, and/or resource management employees, which include information about special hiring authorities, including recruiting/hiring individuals with disabilities:
 - o Strategic Recruiting Utilizing the Schedule A Hiring Authority
 - o Fundamentals of Mission Support Training Recruitment and Placement Module
 - Annual Inclusive Diversity Dialogue sessions focused on Persons with Disabilities o Internal DHS Strategic Talent Recruitment, Inclusive Diversity and Engagement (STRIDE)
 - o Diversity Panel Discussion for USCIS Asylum hiring Manager and Supervisors.
 - o Training modules: DEIA: Silence is Not an Option and DEIA: Taking the Mystery Out of Hiring
 - o Career Development Programs that include DEIA content.
- The following additional ad hoc training is provided: o Training on the Schedule A hiring authority upon request.
 - o HR Specialists provide hiring managers with an overview of the special hiring authorities as a regular part of their staffing and recruitment efforts.
 - HCT and OEOI conduct training sessions in person and through webinars on non- competitive hiring authorities

- for hiring managers.
- HCT and OEOI collaborate to provide a Leadership Lessons Series (LLS) module on Recruiting, Hiring and Retaining Persons with Disabilities, Managing Diversity and Inclusion, and Leveraging Diversity and Inclusion.
- HR Specialists monthly provide supervisors with lists of all excepted service employees, including Schedule A hires, who are eligible to convert to a competitive, permanent position.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

Describe the agency's efforts to establish and maintain contacts with organizations that assist PWD, including PWTD, in securing and maintaining employment.

USCIS continues to leverage these partnerships in activities and events with them including:

- The Veterans Employment Program Manager (VEPM) partnered with DHS and local military installations to provide employment workshops to transitioning service members and disabled veterans. In addition, USCIS also promoted non-paid work experience programs.
- The Selective Placement Program Coordinator partnered with Workforce Recruitment Program (WRP) Recruiter Program, the State and Federal Vocational Rehabilitation Programs, and DHS to provide individuals with disabilities more opportunities to prepare for, find, and maintain a job.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

1. Using the goals of 12% for PWD and 2% for PWTD as the benchmarks, do triggers exist for PWD and/or PWTD among the new hires in the permanent workforce? If "yes", please describe the triggers below.

a. New Hires for Permanent Workforce (PWD)

Answer No

b. New Hires for Permanent Workforce (PWTD)

Answer No

New Hires	Total (#)	Reportable Disability Permanent Workforce (%)	Reportable Disability Temporary Workforce (%)	Targeted Disability Permanent Workforce (%)	Targeted Disability Temporary Workforce (%)
% of Total Applicants	47440	3.76	0.00	1.68	0.0
% of Qualified Applicants	38671	3.79	0.00	1.67	0.0
% of New Hires	1542	25.42	0.00	3.11	0.0

2. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the new hires for any of the mission- critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. New Hires for MCO (PWD)

Answer No

b. New Hires for MCO (PWTD)

Answer Yes

A review of Table B6-1 New hires by MCO was conducted. The applicant flow data was derived from Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections: 2210 A trigger was identified when comparing the qualified applicant pool for PWTD (1.20%) to the selection rate of 0.00%.

New Hires to Mission-Critical Occupations	Total #	Reportable Disability New Hires	Targetable Disability New Hires
NUMERICAL GOAL	*	12%	2%
0301 MISCELLANEOUS ADMINISTRATION	88	51.14	2.27
0343 MANAGEMENT AND PROGRAM ANALYST	57	40.35	8.77
0930 REFUGEE AND ASYLUM OFFICER	265	17.36	1.51
1801 IMMIGRATION SERVICES OFFICER	583	26.07	3.26
1802 IMMIGRATION SERVICES OFFICER	528	22.16	3.41
2210 INFORMATION TECHNOLOGY SPECIALIST	21	42.86	0.00

- 3. Using the relevant applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among the qualified internal applicants for any of the mission-critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.
 - a. Qualified Applicants for MCO (PWD)

Answer N/A

b. Qualified Applicants for MCO (PWTD)

Answer N/A

Relevant applicant pool data is not available. Qualifications are not adjudicated until an applicant applies for a specific position and he or she may qualify based on experience obtained prior to entry into their current job series or into DHS. DHS has not attempted to develop an estimate for job series-relevant applicant pools to-date. Based on this, USCIS is not tabulating relevant applicant pools for this reporting cycle.

- 4. Using the qualified applicant pool as the benchmark, do triggers exist for PWD and/or PWTD among employees promoted to any of the mission- critical occupations (MCO)? If "yes", please describe the triggers below. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.
 - a. Promotions for MCO (PWD)

Answer No

b. Promotions for MCO (PWTD)

Answer Yes

A review of Table B6-1 Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: 0343: A trigger was identified when comparing the qualified applicant pool for PWTDs (2.10%) to their selection rate of 1.60%. 1802: A trigger was identified when comparing the qualified applicant pool for PWTDs (3.53%) to their selection rate of 2.68%.

Section V: Plan to Ensure Advancement Opportunities for Employees with Disabilities

Pursuant to 29 C.F.R. §1614.203(d)(1)(iii), agencies are required to provide sufficient advancement opportunities for employees with disabilities. Such activities might include specialized training and mentoring programs, career development opportunities, awards programs, promotions, and similar programs that address advancement. In this section, agencies should identify, and provide data on programs designed to ensure advancement opportunities for employees with disabilities.

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

USCIS provides sufficient advancement opportunities for those with disabilities through internal merit promotion procedures, career ladder and upward mobility positions, and training and career development programs. All employees, including veterans and PWD/ PWTD are encouraged to participate in the variety of internal development programs and training opportunities that are advertised on the HCT website and in USCIS broadcast messages. In FY 2022, the agency continued to engage in initiatives designed to ensure employees with disabilities and employees with targeted disabilities had sufficient advancement opportunities through:

- Internal merit promotion procedures; career ladder and upward mobility positions; and training and career development programs.
- All employees, including veterans and PWD/ PWTD are encouraged to participate in the variety of internal development programs and training opportunities that are advertised on the HCT website and in USCIS broadcast messages.
- USCIS promoted its mentoring programs for employees and for supervisors with less than two years of experience.
- USCIS continued to demonstrate agency commitment and dedication to employees' growth via webinars and training events. For instance: "Developing a Plan to Further Your Career," "Learn About the Aspiring Leaders Program," "Learn About the USCIS Coaching Program," etc. These webinars and trainings helped to build new skills and cultivate employees' professional development.

B. CAREER DEVELOPMENT OPPORTUNITES

- 1. Please describe the career development opportunities that the agency provides to its employees.
 - Leadership Education and Development (LEAD) Programs (GS-4-SES) Career Coaching Program (GS-9-12)
 - Mentoring program for (supervisors and non-supervisors (GS-5-15)) Peer Networking program
 - USCIS Aspiring Leaders Program (GS-4-12)
 - Fundamentals of Mission Support Training (FMST) (GS-4-13)
 - Pathways programs that include Internship, Recent Graduate, and Presidential Management Fellows Of the programs identified, only the LEAD program involves a panel-based selection process. All programs require supervisor approval.
- 2. In the table below, please provide the data for career development opportunities that require competition and/or supervisory recommendation/ approval to participate.

Career Development Opportunities	Total Participant Applicants (#)	Total Participant Selectees (#)	PWD Applicants (%)	PWD Selectees (%)	PWTD Applicants (%)	PWTD Selectees (%)
Coaching Programs	TBD	191	TBD	TBD	TBD	TBD
Fellowship Programs	0	0	0	0	0	0
Mentoring Programs	TBD	281	TBD	TBD	TBD	TBD
Training Programs	TBD	415	TBD	TBD	TBD	TBD
Detail Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Other Career Development Programs	TBD	154	TBD	TBD	TBD	TBD

3. Do triggers exist for PWD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. Applicants (PWD)

Answer N/A

b. Selections (PWD)

Answer N/A

NOTE: TBD is "To be determined". Due to staffing shortages, USCIS was unable to complete this analysis in FY22. Analysis will be completed in FY23. USCIS does not collect demographic data and detailed applicant flow data (AFD) for the career development programs identified above. USCIS will continue to work with DHS, and/or OPM to acquire access to applicant flow data as identified in the planned activities. Data will exclude program participants that cannot be identified in NFC.

4. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs? (The appropriate benchmarks are the relevant applicant pool for the applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. Applicants (PWTD)

Answer N/A

b. Selections (PWTD)

Answer N/A

See the note in #3 above.

C. AWARDS

1. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for any level of the time-off awards, bonuses, or other incentives? If "yes", please describe the trigger(s) in the text box.

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

Note: The inclusion rate of PWD/PWTD is calculated by dividing the number of awards given PWD/PWTD in the category by the total number of PWD/PWTD in the permanent workforce and then multiplying by 100. Then the rate is compared to the corresponding inclusion rate of PWOD/PWOTD. * Time off Awards 21-30 hrs.: for PWTD 4.71% which is below the benchmark of 4.78% * Cash Awards \$501-\$999: for PWTD is 20.47% which is below the benchmark of 22.75% * Cash Awards \$1000-\$1999: for PWD is 38.62% which is below the benchmark of 39.00% * Cash Awards \$2000-\$2999: for PWD is 20.79% and for PWTD is 18.66%. Both are below the benchmark of 22.20% and 22.31%, respectively. * Cash Awards \$3000-\$3999: for PWD is 11.03% and for PWTD is 10.69%. Both are below the benchmark of 14.48% and 14.59%, respectively. * Cash Awards \$4000-\$4999: for PWD is 2.99% and for PWTD is 3.44%. Both are below the benchmark of 5.08% and 5.13%, respectively. * Cash Awards \$5000 or more: for PWD is 0.54% and for PWTD is 0.18%. Both are below the benchmark of 1.28% and 1.32%, respectively.

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance- based pay increases? If "yes", please describe the trigger(s) in the text box.

a. Pay Increases (PWD)

Answer No

b. Pay Increases (PWTD)

Answer Yes

* QSI Award: for PWTD is 0.91% which is below the benchmark of 1.37%

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	62	0.15	0.40	0.18	0.00

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If

"yes", describe the employee recognition program and relevant data in the text box.

a. Other Types of Recognition (PWD)

Answer No

b. Other Types of Recognition (PWTD)

Answer No

USCIS does not maintain data on other types of recognition programs.

D. PROMOTIONS

1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. SES

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer N/A

b. Grade GS-15

i. Qualified Internal Applicants (PWD)

Answer N/A

ii. Internal Selections (PWD)

Answer No

c. Grade GS-14

i. Qualified Internal Applicants (PWD)

Internal Selections (PWD)

Answer N/A

Answer No

d. Grade GS-13

ii.

i. Qualified Internal Applicants (PWD)

Answer

N/A

ii. Internal Selections (PWD)

Answer No

There was no AFD to validate qualified internal applicants or selections for SES candidates. NOTE: Relevant applicant pool data is not available to properly validate qualified internal applicants. Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the agency. They may be government-wide to expand the applicant pool and recruit the best talent into the agency. As a result, the current USCIS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current USCIS employees would qualify for a job series they are not currently in is a difficult undertaking. HCT does not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series. USCIS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, USCIS will not attempt to tabulate relevant applicant pools for this reporting cycle.

- 2. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.
 - a. SES

i. Qualified Internal Applicants (PWTD)

Answer N/A

ii. Internal Selections (PWTD) N/A Answer b. Grade GS-15 Qualified Internal Applicants (PWTD) Answer N/A ii. Internal Selections (PWTD) Answer No c. Grade GS-14 i. Qualified Internal Applicants (PWTD) N/A Answer ii. Internal Selections (PWTD) Answer No

d. Grade GS-13

i. Qualified Internal Applicants (PWTD) Answer N/A ii. Internal Selections (PWTD) Answer No

There was no AFD to validate qualified internal applicants or selections for SES candidates. NOTE: Relevant applicant pool data is not available to properly validate qualified internal applicants. Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the agency. They may be government-wide to expand the applicant pool and recruit the best talent into the agency. As a result, the current USCIS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current USCIS employees would qualify for a job series they are not currently in is a difficult undertaking. HCT does not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series. USCIS has not attempted to develop estimated relevant applicant pools to date. Consistent with prior practice, USCIS will not attempt to tabulate relevant applicant pools for this reporting cycle.

3. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a.	New Hires to SES (PWD)	Answer	N/A
b.	New Hires to GS-15 (PWD)	Answer	No
c.	New Hires to GS-14 (PWD)	Answer	No
d.	New Hires to GS-13 (PWD)	Answer	No

There was no AFD to validate new hires of SES candidates.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a.	New Hires to SES (PWTD)	Answer	N/A
b.	New Hires to GS-15 (PWTD)	Answer	N/A
c.	New Hires to GS-14 (PWTD)	Answer	No
d.	New Hires to GS-13 (PWTD)	Answer	No

There was no AFD to validate new hires of SES candidates.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for

promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWD)ii. Internal Selections (PWD)Answer No

b. Managers

i. Qualified Internal Applicants (PWD)ii. Internal Selections (PWD)Answer Yes

c. Supervisors

i. Qualified Internal Applicants (PWD)ii. Internal Selections (PWD)Answer N/A

Relevant applicant pool data is not available to properly validate qualified internal applicants.

6. Does your agency have a trigger involving PWTD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. Executives

i. Qualified Internal Applicants (PWTD)ii. Internal Selections (PWTD)Answer No

d. Managers

i. Qualified Internal Applicants (PWTD)ii. Internal Selections (PWTD)Answer No

e. Supervisors

i. Qualified Internal Applicants (PWTD) Answer N/Aii. Internal Selections (PWTD) Answer Yes

Based on Table B8-1: Triggers were identified for promotions of PWTDs to supervisory positions when comparing the participation rate of promotions to the percentage of qualified internal applicants by supervisory position. Supervisors A trigger was identified when comparing the qualified internal applicants for PWTDs (3.24%) to their promotion rate of 2.61%*. Note: Relevant applicant pool data is not available to properly validate qualified internal applicants. Executives are identified based on their hiring authority (for example, SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. *NOTE: See note D.3. above.

- 7. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.
 - a. New Hires for Executives (PWD)

Answer Yes

b. New Hires for Managers (PWD)

Answer Yes

c. New Hires for Supervisors (PWD)

Answer No

Based on Table B8-1: Triggers were identified for new hires of PWDs to supervisory positions when comparing the participation rate of new hires to the percentage of qualified applicants by supervisory position. Executives A trigger was identified when comparing the qualified applicants for PWDs (37.50%) to their new hire rate of 14.29%. Managers A trigger was identified when comparing the qualified applicants for PWDs (57.14%) to their new hire rate of 28.95%*. These are new triggers. Executives are identified based on their hiring authority (for example, SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. *NOTE: See note in D.3. above.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the text box. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the text box.

a. New Hires for Executives (PWTD)

Answer N/A

b. New Hires for Managers (PWTD)

Answer No

c. New Hires for Supervisors (PWTD)

Answer No

Section VI: Plan to Improve Retention of Persons with Disabilities

To be model employer for persons with disabilities, agencies must have policies and programs in place to retain employees with disabilities. In this section, agencies should: (1) analyze workforce separation data to identify barriers retaining employees with disabilities; (2) describe efforts to ensure accessibility of technology and facilities; and (3) provide information on the reasonable accommodation program and workplace assistance services.

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

1. In this reporting period, did the agency convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service (5 C.F.R. § 213.3102(u)(6)(i))? If "no", please explain why the agency did not convert all eligible Schedule A employees.

Answer No

USCIS tracks individuals who are on an excepted service appointment including those on a Schedule A appointment and provides reports to offices advising when a person is eligible for conversion to a competitive service appointment. Managers are responsible for conversion or any further action. OEOI and HCT will review FY 2022 Schedule A eligible non-conversions to analyze reasons for non-conversions in FY 2023, will continue to closely monitor the progress of Schedule A separations and conversions, and is implementing an action plan to resolve the discrepancies. In FY 2022, USCIS converted 62 Schedule A employees out of 72 (82.11%) who were eligible. This is an increase of 9 % compared with FY 2021. Of those converted:

- 1 (1.39%) was hired/promoted to career/career conditional appointments.
- 2 (2.78%) had processing errors when converted.
- 6 (8.33%) were eligible but not converted (a decrease of 33% from FY 2021).
- There was 1 (1.39%) separation before conversion. During FY22 we had 10.52% less Schedule A individuals separated compared to FY21 reporting.
- 2. Using the inclusion rate as the benchmark, did the percentage of PWD among voluntary and involuntary separations exceed that of persons without disabilities? If "yes", describe the trigger below.
 - a. Voluntary Separations (PWD)

Answer Yes

^{*}NOTE: See note in D.3. above.

b. Involuntary Separations (PWD)

Answer Yes

Table B-1 was reviewed. PWDs in the permanent workforce are exceeding the inclusion rate benchmark for voluntary and involuntary separations. Voluntary Separations: A trigger was identified when comparing the inclusion rate for PWDs (5.34%) to the PWODs inclusion rate of 3.82%. The PWD rate increased 0.69% from FY 2021. Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWDs (3.14%) to the PWODs inclusion rate of 1.46%. The PWD rate decreased 0.13% from FY 2021. NOTE: For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Separations Permanent Workforce	Total#	Reportable Disabilities %	Without Reportable Disabilities %
Reduction in Force	0	0	0
Removal	55	0.52	0.21
Resignation	320	2.47	1.39
Retirement	472	2.82	2.34
Other Separations	317	2.6	1.33
Total Separations	1164	8.41	5.27

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If "yes", describe the trigger below.

a. Voluntary Separations (PWTD)

Answer Yes

b. Involuntary Separations (PWTD)

Answer Yes

Table B-1 was reviewed. PWTDs in the permanent workforce are exceeding the inclusion rate benchmark for voluntary and involuntary separations. Voluntary Separations: A trigger was identified when comparing the inclusion rate for PWTDs (4.89%) to the PWOTDs inclusion rate of 4.13%. The PWTD rate increased 0.20% from FY2021. Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWTDs (3.80%) to the PWOTDs inclusion rate of 1.89%. The PWTD rate increased 0.18% from FY2021. NOTE: For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Separations Permanent Workforce	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Reduction in Force	0	0.00	0.00
Removal	55	0.54	0.28
Resignation	320	2.53	1.64
Retirement	472	2.35	2.46
Other Separations	317	3.25	1.60
Total Separations	1164	8.66	5.99

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

Agency Exit survey data was not accessible this year.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency

technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

- 1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.
 - The public website notice of Section 508 accessibility is located at: https://www.uscis.gov/website-policies/accessibility. The internal website also has a notice of Section 508 accessibility and provides a help desk number and email for employees with issues of accessibility.
- 2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.
 - The notice is located at: https://www.uscis.gov/website-policies/accessibility
- 3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

USCIS continues to improve accessibility to its facilities. In FY22, USCIS installed automatic door openers in 14 additional locations: Cincinnati Field Office, Detroit Field Office, Fort Smith FSO, Atlanta District/Field Office, Portland, ME Field Office, Los Angeles District Office, Philadelphia Field Office, Kendall Field Office, Dallas District/Field Office, Des Moines Field Office, Fort Myers Field Office, Pittsburgh Field Office, Miami District/Field Office, and Houston District/Field Office. Additional sites will be retrofitted with automatic door openers in fiscal years 2023-2025 or as offices relocate.

C. REASONABLE ACCOMMODATION PROGRAM

Pursuant to 29 C.F.R. § 1614.203(d)(3), agencies must adopt, post on their public website, and make available to all job applicants and employees, reasonable accommodation procedures.

- 1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)
 - This information is not available for FY 2022 because the DHS-operated system used for tracking requests for reasonable accommodation was updated in FY 2019 and, as a result, reporting capabilities have been negatively impacted. USCIS has identified and commenced work on an alternative system with the ability to provide accurate data regarding processing time for reasonable accommodation. The projected completion date is 6/30/2023 with anticipated implementation by 9/30/2023.
- 2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

In FY 2022, OEOI received 1562 requests for reasonable accommodation resulting in a 101% increase over FY 2021. This included, but was not limited to, requests for telework/remote work, job duty modification, schedule change, assistive technology such as hardware/software, ergonomic chairs, and sign language interpreters. • USCIS continued the best practice of utilizing a central accommodation fund which provided \$3,500,000 in funding for reasonable accommodation requests in FY 2022. • USCIS trained 177 supervisors and 181 non-supervisory employees on the reasonable accommodation process during FY 2022 with a total of 8 sessions held. • USCIS continued to provide captioning and remote sign language interpreters for meetings and trainings. • USCIS streamlined the approval and

provisioning of accommodation software to provide a more efficient and expedited process for employees with disabilities. • USCIS gained approval and allocated funding for an updated reasonable accommodation tracking system. • Reasonable accommodation and personal assistance services procedures were approved by the EEOC in April 2022

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 CFR §1614.203(d)(5), federal agencies, as an aspect of affirmative action, are required to provide personal assistance services (PAS) to employees who need them because of a targeted disability, unless doing so would impose an undue hardship on the agency.

Describe the effectiveness of the policies, procedures, or practices to implement the PAS requirement. Some examples of an effective program include timely processing requests for PAS, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

USCIS personal assistance services requests are handled through the agency's reasonable accommodation procedures. The updated management directive on Disability Accommodation and Personal Assistance Services for Employees and Job Applications (MD256-006) were submitted to the EEOC and approved on April 21, 2022. The procedures and EEOC guidance on PAS and new rule implementing Section 501 are posted on the USCIS external and internal websites: https://www.uscis.gov/about-us/affirmative- action-plan-for-the-recruitment-hiring-advancement-and-retention-of-persons-with This link is to the current MD. The new procedures are in the process of being finalized and will be posted externally upon receipt.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging harassment, as compared to the governmentwide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging harassment based on disability status result in a finding of discrimination or a settlement agreement?

Answer Yes

- 3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.
 - In response to question one, PWDs alleged harassment in 28 out of 104 formal complaints (26.92%), which is higher than the government-wide average of 21.98% and higher than the FY 2020 rate of 20.82%.
 - In response to question two, there were 10 settlement agreements and no findings of discrimination.
 - Corrective Measures include training 4 managers from the office where the finding occurred on the EEO process.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?

Answer Yes

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?

Answer Yes

3. If the agency had one or more findings of discrimination involving the failure to provide a reasonable accommodation during the last fiscal year, please describe the corrective measures taken by the agency.

In FY 2021:

- In response to question one, PWDs alleged harassment in 22 out of 88 formal complaints (25.00%) which is higher than the government-wide average of 22.10% and higher than the FY 2020 rate of 20.82%.
- In response to question two, there were 10 settlement agreements and no findings of discrimination.

Section VIII: Identification and Removal of Barriers

Element D of MD-715 requires agencies to conduct a barrier analysis when a trigger suggests that a policy, procedure, or practice may be impeding the employment opportunities of a protected EEO group.

1. Has the agency identified any barriers (policies, procedures, and/or practices) that affect employment opportunities for PWD and/or PWTD?

Answer Yes

2. Has the agency established a plan to correct the barrier(s) involving PWD and/or PWTD?

Answer Yes

3. Identify each trigger and plan to remove the barrier(s), including the identified barrier(s), objective(s), responsible official(s), planned activities, and, where applicable, accomplishments

A. Source of the Trigger: Workforce Data (if so identify the table)

Specific Workforce Data Table: Workforce Data Table - B6

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Trigger 1. Lower than expected participation among PWD and/or PWTDs in 1) new hires and promotions for MCOs, in senior grades, and for supervisory positions.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:

Barrier Group - People with Disabilities People with Targeted Disabilities Barrier Analysis Process Completed? No Barrier(s) Identified No

STATEMENT OF IDENTIFIED BARRIER:

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

Barrier Name - Barriers have not been identified.

Description of Policy, Procedure, or Practice: NA

Objective(s) and Dates for EEO Plan:

Date Initiated: 10/01/2017 **Target Date:** 09/30/2018

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2024 **Date Completed:** N/A

Objective Description

Examine the reason for the trigger.

Responsible Official(s)

Title / Name / Standards Address the Plan?

• Branch Chief, HROC, Human Capital and Training (HCT)/ Robyn Logsdon/ No

- Division Chief, Complaints Resolution Division, OEOI/ Rebecca Arsenault-Herize/ No
- Supervisory. Equal Employment Specialist, Diversity, and Inclusion Division, OEOI/Morenike Ogebe/ No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018

Planned Activities: 1. OEOI and HCT will partner to identify and implement strategies to increase recruitment of

PWTD.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2018

Planned Activities: 2. OEOI will monitor applicant data of PWTD in major occupations to identify trends.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 9/30/2018

Planned Activities: 3. OEOI will develop a Quick Reference Guide for Disability hiring for managers. (Now activity 1-1

Sufficient Staffing Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2022

Target Date: 09/30/2018

Planned Activities: 4. OEOI will develop and conduct a pilot program to identify entry level and promotional

opportunities for PWDs. (Now activity 2-1). **Sufficient Staffing & Funding?**Yes

Modified Date: N/A

Completion Date: 9/30/2023

Target Date: 09/30/2018

Planned Activities: 5. OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach

Plan (CROP).

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2019

Planned Activities: 6. OEOI and HCT will collaborate to monitor and review promotions and identify trends. (Now

activity 3-1).

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2020

Completion Date: 09/30/2020

Target Date: 09/30/2019

Planned Activities: 7. OEOI and HCT will collaborate to develop a plan to review policies, practices and procedures

related to promotion. (Now activity 5-1)

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2023

Target Date: 09/30/2020

Planned Activities: 8. OEOI and HCT will review and analyze results of the Merit Promotion study. (Now activity 6-1

and 3-2)

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2024

Target Date: 09/30/2020

Planned Activities: 9. OEOI and HCT will work with DHS CRCL to access AFD by disability to effectively analyze

percent of qualified candidates for promotions as required by

MD-715. (Now activity 7-1).

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2023

Target Date: 09/30/2021

Planned Activities: 10. OEOI will develop a disability demographic snapshot and distribute to HCT and senior

leadership. (Now activity 8-1).

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 12/21/2023

Target Date: 09/30/2020

Planned Activities: 4-1 OEOI and HCT will collaborate to review merit promotion data for indications of

triggers/barriers.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2024

Report of Accomplishments

Fiscal Year Accomplishments 2022

Activities 1-1 to 8-1

USCIS issued its first draft of a DEIA Strategic Plan that lays out strategies to integrate and sustain DEIA in USCIS workforce policies, practices, and culture in compliance with EO 14035. The strategies and actions on Goal 2 (Diversity) directly align with the activities in this trigger and will strengthen accountability through regular reporting.

Activities 1-6

HCT began transitioning from Monster Hiring Management Enterprise to USAJOBS (See Activity 7-1) which is more robust for AFD reporting. Once the transition is complete, the capability to capture internal promotion data will be tested.

Activities 2-1

The HROC STAR Branch has included DEIA efforts and ERIG data in their ongoing discussions with hiring managers and recruitment/outreach efforts. During FY 2022 OEOI has drafted a DEIA plan.

Activities 4-1

USCIS conducted focused MCO recruitment/outreach initiatives. USCIS MD-715 data will continue to be collected and monitored.

Activities 5-1

HCT drafted an updated USCIS Merit Promotion and Internal Placement Plan that will manage and administer merit promotion and internal placement procedures for all positions. The Career Ladder promotion policy was updated and posted.

Activities 7-1

During FY 2022 USCIS began to transition from MHME back to the USA Staffing platform. This will allow for readily accessible AFD for continued analysis. HCT conducted a validation study to measure the effectiveness of the predictive assessments used in the hiring process at USCIS. Based on the results of the study USCIS also paused the use of the use of predictive assessment in in most positions.

Activities 8-1

OEOI continued to prepare an annual Demographic snapshot that is posted on their internal site OEOI and HCT continued to develop an HR dashboard that includes real-time ERIG workforce data in Tableau. The HROC STAR Branch has included DEIA efforts and ERG&I data in their ongoing discussions with hiring managers. Weekly HCT reports are provided by STAR on DEIA efforts. During FY 2022 OEOI has drafted a DEIA plan.

Fiscal Year Accomplishments 2021

Modifications and Accomplishments:

Activities X-1 Continued activities identified in FY2020. Quick Reference Guide was prepared and is pending senior management review.

In FY 2021 OEOI and HCT collaborated on a variety of hiring, recruitment, outreach activities including:

- HCT revised the Special Hiring Authorities Brochure that highlights the Schedule A Hiring Authority.
- OEOI collaborated with Nebraska Service Center to explore identifying several positions for Schedule A hires (ongoing) (See 2-1).
- HCT (HROC) developed a webinar on "Strategic Recruiting: Utilizing the Schedule A Hiring Authority for Individuals with Disabilities."
- OEOI, HROC and OP&Q met and discussed Neurodiversity hiring and identified and met with Microsoft and CACI to learn their best practices in recruiting and retaining employees who are neurodivergent.
- Solicited and expanded collaboration with program offices and directorates' participation in disability outreach
- Administered My EPP Disability Resurvey Campaign during National Disability Employment Awareness Month through the end of FY 2021.
- Disability Employment Toolkit for Hiring Managers was finalized.
- HCT has initiated over 200 enhancements from Monster Hiring Management Enterprise to include changes to better track AFD by ERIG and disability and manage assessments of persons with disabilities (see 7-1 and 1-2, and Part H.6.)
- Activity 8-1 was modified to include DEIA initiatives

Activities 2-1, 4-1, 5-1, 6-1, 7-1, 8-1 dates were extended to allow time to achieve targets.

Fiscal Year Accomplishments 2020

Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Dates were extended to allow reasonable time to

accomplish objectives.

Activities: OEOI continued to partner with HCT to identify and implement strategies to increase recruitment of PWTDs and OEOI also continued to monitor applicant data of PWTDs in major occupations to identify trends. OEOI worked with HCT's Human Resources Information Technology division (HRIT) to integrate Demographic Snapshots with an HR Mart data dashboard in Tableau. (Former activities 1, 5, and 2).

Fiscal Year Accomplishments 2019

Modifications: Updated planned activities to include responsible POCs. The trigger statement was combined with former trigger #6 to address the triggers together more effectively; this resulted in additional planned activities #6-10. The 0301 MCO for new hires was no longer a trigger so it was removed and the 2210 MCO for new hires and promotions was added as a new trigger.

Accomplishments: A planned activity was added to develop further awareness among senior managers and HCT staffing about triggers among the disability workforces.

OEOI finalized a hiring managers toolkit and a SEPM toolkit to assist managers with recruiting and hiring persons with disabilities. The kits are under review and pending implementation in FY 2020.

OEOI and HCT worked on the FED TOOL 2019 that is a combined version of the FEORP and the DVAAP reports. The identified trends have been shared with USCIS offices.

Dates for planned activities #6-10 were pushed back to allow time to complete the objectives and to effectively coordinate multiple program reviews. HCT convened a working group to begin work on the promotions trigger. See also Part H measures C.4.a, C.4.c, E.4.a.2 and E.4.a.4.

Fiscal Year Accomplishments 2018

The statement of the trigger and objective was modified. In comparison with the qualified applicant pool, a trigger no longer exists for PWTD among new hires for the Management Program Analyst Mission Critical Occupation (0343). However, new triggers exist for PWTDs among employees promoted to the 1801, 0301, 0343, and 1802 MCOs and for new hires and/or promotions to the higher grades and supervisory positions.

Planned Activity 3:

Conducted a baseline study of best practices from other federal agencies and created a project outline for submission to leadership for approval. HCT/ SPPC received approval to visit other DHS' Components to understand more about components' procedures, processes and policies.

Planned Activity 4:

Held meetings with several hiring offices including the Potomac Service Center (PSC) and the Vermont Service Center (VSC).

Planned Activity 5:

HCT in partnership with OEOI developed and submitted the Coordinated Recruitment and Outreach Plan (CROP) for FY19 to the Department (DHS). The plan supports a strategic and unified approach to recruit a diverse workforce while improving the performance and efficiency of USCIS operations. OEOI provided a race, ethnicity, and gender profile for FY18 and a mission critical position gap analysis was conducted to identify the groups with low representation rates in the 1801 series to focus recruiting and outreach. While the agency was required to focus only on the USCIS Mission Critical series 1801, further barrier analysis will be done on underrepresentation in non-mission critical positions including 0301, 0343, 1802, and 0930 in next year's report.

B. Source of the Trigger:

Workforce Data (if so identify the table)

Specific Workforce Data Table: Workforce Data Table - B1

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Trigger 2. A higher number of PWD and PWTD voluntarily and involuntarily separated from the agency than persons without disabilities/ targeted disabilities.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:

Barrier Group ~ People with Disabilities Barrier Analysis Process Completed? No Barrier(s) Identified? No

STATEMENT OF IDENTIFIED BARRIER:

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

Barrier Name: Barriers have not been identified. Description of Policy, Procedure, or Practice: N/A

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017. **Target Date:** 09/30/2018

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2024. **Date Completed**: N/A

Objective Description

Examine the trigger to determine the reasons why PWD and PWTD are separating from the agency at higher rates than persons without disabilities /targeted disabilities.

Responsible Official(s)

Title / Name / Standards Address the Plan?

- Supervisory Equal Employment Specialist, Diversity and Inclusion Division, OEOI/ Morenike Ogebe / No
- Branch Chief, Human Resources Operations Center, HCT / Robyn Logsdon / No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018

Planned Activities: 1. OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2018

Planned Activities: 2. OEOI will monitor separation data of PWD to identify trends.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2019

Planned Activities: 3. OEOI will monitor exit survey results for separation trends of PWD.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2018

Planned Activities: 4. OEOI will review tracking of ERIG and disability in career development programs.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2018

Planned Activities: 5. OEOI will conduct the third bi-annual EEO Climate Survey.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2019

Planned Activities: 6. OEOI and HCT will continue to partner with DHS and OPM to develop best practices to access

and track AFD for internal promotions. (Now activity 1-2).

Sufficient Staffing & Funding? Yes

Modified Date: 12/31/2023 Completion Date: 09/30/2022

Target Date: 09/30/2019

Planned Activities: 7. OEOI and HCT will collaborate to conduct a review of merit promotions for indications of

barriers. (Now activity 2-2).

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2024 **Completion Date:** N/A

Target Date: 09/30/2021

Planned Activities: 8. OEOI and HCT will collaborate to review and analyze results of merit promotions study. (Now

activities 6-1 and 3-2).

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2024 **Completion Date:** N/A

Target Date: 09/30/2019

Planned Activities: 9. OEOI will analyze Climate survey results for retention data on PWD/PWTD.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2019

Target Date: 09/30/2020

Planned Activities 10. OEOI will administer fourth EEO and Diversity Climate Survey with questions focused on

PWD/PWTD triggers. (Now activity 4-2). **Sufficient Staffing & Funding?** Yes

Modified Date: 07/14/2021 Completion Date: 07/14/2021 **Target Date:** 09/30/2020

Planned Activities: 5-2 OEOI will analyze Climate Survey results.

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2022 Completion Date: 09/30/2022

Report of Accomplishments

Fiscal Year Accomplishments 2022

Activities 1-2

- USCIS is anticipating access to more AFD data as the Agency is transferring systems from MHME to USA Staffing.
 OEOI manually tracks career development programs and cross maps applicant data with demographics using information from HCT. Working group formed with HCT for merit promotion review. Activities 2-2
- Formed monthly OEOI-HCT DEIA working group in the TEAMS platform for document sharing. Activities 5-2
- OEOI briefed agency senior leadership on the results of the FY 2021 EEO and Diversity Climate Survey on May 5, 2022, and results were distributed to Program Offices and Directorates.

Fiscal Year Accomplishments 2021

Activities X-2

- USCIS administered the EEO and Diversity Climate Survey from June 9 to July 14, 2021. Results are pending analysis. Scheduling briefing with Director and senior management (4-2).
- 1-2 OPM was removed as a stakeholder because USCIS has transitioned hiring management systems from USAJOBS (OPM) to Monster.
- HCT is reviewing and upgrading the Exit Survey system in Tableau that will allow for more robust reporting on separations. (See Parts I.1. and I.2.)
- Activities 1-2 and 2-2 dates were extended to allow time to achieve targets.

Fiscal Year Accomplishments 2020

Modifications: Activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Former activity 8 was also added to trigger 1 (activity 6-1 and 3-2). Dates were extended to allow reasonable time to accomplish objectives. Former

OEOI continued to partner with HCT to identify and implement strategies to increase retention of PWDs such as: monitoring separation data like exit survey data for trends and reviewing participation of PWDs in career development programs.

Fiscal Year Accomplishments 2019

Modification: Planned activities were updated to include responsible POCs.

Accomplishments: FY 2018 EEO and Diversity Climate Survey results were reviewed to analyze PWD responses as compared with PWOD ones. PWD revealed that they believed they were more likely to be discriminated against and witness/experience discrimination/harassment than PWOD. PWD witnessed or experienced discrimination on the bases of age, gender, and disability, respectively more than any other bases. The most prevalent issues witnessed or experienced by PWDs were Work Assignments (54%), Promotion/Non-Selection (41%) and Performance/Evaluation (41%) in contrast with all respondents to the survey who identified harassment, promotion/non-selection, and work assignments, respectively. Although PWDs value diversity and have a favorable view of the organization, it is less favorable than PWOD. PWDs were considering leaving more than PWOD with 54.15% responding affirmatively.

OEOI partnered with HCT to discuss with Monster solutions about requirements to track AFD. There have been improvements in accessibility to AFD each year but, as identified in Part H, there remain some deficiencies. Two additional career development programs were tracked and reported on by HCT this year and OEOI manually provided

the demographic data. USCIS continues to monitor trends on separations. A merit promotion review will be conducted in FY 2020.

Fiscal Year Accomplishments 2018

Modifications: Modified the trigger statement and objective to include a trigger for persons with targeted disabilities in involuntary and voluntary separations; added clarification to Planned Activity #4; added Planned Activity #8.

Planned Activity 1:

HCT and OEOI collaborated to work on several recruitment actions for PWD and PWTD as reported in this plan. See Part H, B.3.a. and Part J, Section III A, above.

Planned Activity 2 and 3:

Separation data and exit survey data were collected and reviewed and results are reported in this plan.

Planned Activity 4:

OEOI worked with HCT Training and Career Development Division (TCDD) and established a new procedure to manually collect applicant data on programs to initiate tracking of demographic data by ERIG and disability. The data was reviewed, analyzed, and reported in this plan.

Planned Activity 4 and 6:

HCT is testing a Human Capital Business Systems (HCBS) end-to-end (E2E) solution by Monster Government Solutions which is intended to support all personnel action processing throughout an employee's lifecycle and interface with the National Finance Center (NFC) and the Office of Personnel Management (OPM) to allow HR Specialists to service all human capital functions including recruitment, assessment, selection, onboarding, awards. With this acquisition, USCIS plans to address limitations to the applicant flow identified above. (See additional detail in Part H, measures E.4.a.2. and E.4.a.4.)

Planned Activity 7:

HCT & OEOI are reviewing an outline of the Merit Promotion Program Review Plan which will take placed in FY2019. HCT is establishing a review working group including a staffing team, data analysis team, training team, Labor and Employee Relations, and payroll team, who will contribute to the final plan.

C. **Source of the** Trigger: EEO Complaint(s) **Specific Workforce Data Table:** Workforce Data Table – B1

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Trigger 3. PWD that alleged harassment and failure to provide a reasonable accommodation in formal EEO complaints is higher than the government-wide average.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:

Barrier Group ~ People with Disabilities Barrier Analysis Process Completed? No Barrier(s) Identified? No

STATEMENT OF IDENTIFIED BARRIER:

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

Barrier Name: Barriers have not been identified.

Description of Policy, Procedure, or Practice: NA

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017 **Target Date:** 09/30/2019

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2021 **Date Completed:** N/A

Objective Description:

Examine the trigger to determine the reason for the high occurrence of harassment complaints and complaints based on failure to provide a reasonable accommodation.

Responsible Official(s)

Title / Name / Standards Address the Plan?

- Division Chief, Complaints Resolution, OEOI / Rebecca Arsenault-Herize / No
- Supervisory EEO Specialist, Disability Accommodations Program, OEOI / Sandra Sutton / No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018

Planned Activities: 1. OEOI will review and monitor harassment and reasonable accommodation complaints by PWD

and identify trends

Sufficient Staffing & Funding? Yes

Modified Date: 9/30/2020 Completion Date: 09/30/2020

Target Date: 03/31/2018

Planned Activities: 2. OEOI will issue a new EEO policy statement with strong language on anti-harassment.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 12/13/2019

Target Date: 09/30/2019

Planned Activities: 3. OEOI will review the reasonable accommodations process and identify opportunities for

efficiencies.

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2020 **Completion Date:** 09/30/2020

Target Date: 09/30/2018

Planned Activities: 4. OEOI will identify and implement ways to educate managers on prevention of harassment,

discrimination, and reprisal.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/11/2018

Target Date: 09/30/2018

Planned Activities: 5. OEOI will create and implement an Anti-Bullying initiative. (Now activity 2-3)

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2020 Completion Date: 09/30/2020

Target Date: 09/30/2020

Planned Activities: 1-3. OEOI will issue a new EEO policy statement with strong language on anti-harassment.

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2021 **Completion Date:** 09/30/2021

Report of Accomplishments

Fiscal Year Accomplishments 2022

Activities identified are ongoing.

Fiscal Year Accomplishments 2021

Accomplishments X-3

OEOI issued a new EEO policy statement that was signed by the new Director on 9/30/2021 (1-3).

Fiscal Year Accomplishments 2020

Modifications: Activities were revised and renumbered to consolidate them.

Activities: OEOI continued to review and monitor harassment and reasonable accommodation complaints by PWDs, identified trends and opportunities for efficiencies in the reasonable accommodations process, and worked on identifying and implementing ways to educate managers on prevention of harassment, discrimination, and reprisal (former activities 1, 3, and 4) including:

- a. Collected trend data on complaints. Plans were discussed to convene a working group to exchange data on reasonable accommodation complaints and EEO trends.
- b. Partnered with the Office of Intake and Document Production (OIDP) to conduct a process efficiency review of the reasonable accommodation process but OEOI has been unable to follow up on implementation due to problems with the ACMS database which impacts the ability to track requests.
- c. HCT offered anti-bullying training to all employees.

Fiscal Year Accomplishments 2019

Modifications: Planned activities were updated to include responsible POCs. The trigger statement was modified to reflect the change in the government-wide averages from 18.05% to 19.69% for PWDs who alleged harassment and from 12.50% to 13.53% for PWDs who alleged failure to provide reasonable accommodations.

Accomplishments: Related to Planned Activities #1 and #3, OEOI held sign language interpretation contract focus groups to educate recipient employees and their supervisors and get feedback on the reasonable accommodation process.

Planned Activity #5: Due to numerous vacancies and an increased workload in OEOI, the Anti- Bullying initiate remained in the exploratory phase in FY 2019.

Fiscal Year Accomplishments 2018

Modification: The statement of the trigger has been modified to reflect a change in FY 2017 462 Report data on the government wide averages for harassment complaints and failure to accommodate complaints by PWD which changed from 14.23% to 18.05% and from 9.74% to 12.50%, respectively.

Planned Activity 1:

This activity is extended and will be ongoing in FY 2019.

Planned Activity 2:

The USCIS Director issued the USCIS Equal Employment Opportunity and Harassment Policy Statement on January 19, 2018, reaffirming the agency's commitment to equal employment opportunity and non-tolerance for

discrimination, including workplace harassment.

Planned Activity 3:

In collaboration with OIDP, OEOI initiated a review of the Reasonable Accommodation program in 2018 with a focus on process improvement, particularly in contracting services. The standard operating procedures (SOP) are in development and recommendations are pending. In addition, DHS CRCL began an agency wide overhaul of ACMS, the database that tracks accommodation requests, the enhancements are ultimately intended to build efficiencies into the system for tracking and reporting. These projects are ongoing.

Planned Activity 4:

This is an ongoing initiative. USCIS conducted two new Anti-harassment webinar lunch and learn sessions for employee and managers. The Anti-harassment lunch and learns reached over 200 USCIS employees and managers. USCIS was 99% compliant with the new DHS Anti-harassment training requirement in FY2018.

Planned Activity 5:

This is an ongoing initiative. Some research and benchmarking was done to baseline the initiative.

D. Source of the Trigger: Workforce Data (if so, identify the table)

Specific Workforce Data Table: Workforce Data Table - B9

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:

Trigger 4. PWD and PWTD received less time off awards, cash awards, and Quality Step Increases (QSIs) of specific denominations as compared with persons without disabilities and persons without targeted disabilities.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:

Barrier Group - People with Disabilities and People with Targeted Disabilities

Barrier Analysis Process Completed? No Barrier(s) Identified? No

STATEMENT OF IDENTIFIED BARRIER:

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition

Barrier Name – Barriers have not been identified. Description of Policy, Procedure, or Practice N/A

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017 **Target Date:** 09/30/2018

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2025 **Date Completed:** N/A

Objective Description

Identify policy, practice or procedures that may be impacting award distribution for PWD and PWTDs.

Responsible Official(s)

Title / Name / Standards Address the Plan?

- Branch Chief, HROC, HCT / Robyn Logsdon / No
- Supervisory EEO Specialist, Disability Accommodations Program, OEOI / Sandra Sutton / No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Planned Activities: 1-4 OEOI and HCT will collaborate to track and benchmark performance and awards (time off awards, cash awards, QSIs, recognition). (Former activities 1 and 2).

Target Date: 09/30/2018

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2024 **Completion Date:** N/A

Planned Activities Toward Completion of Objective

Target Date: 09/30/2019

Planned Activities: 3. OEOI and HCT will review and analyze performance.

and awards (time off awards, cash awards and QSIs, recognition). (Former activity 4-3; Now activity 2-4).

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2024 **Completion Date:** N/A

Target Date: 09/30/2021

Planned Activities: 4. OEOI and HCT will collaborate with DHS CRCL/ OCHCO to review and develop best practices in

recognition and awards policies and procedures and determine next steps. (Now activity 3-4)

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2025 **Completion Date:** N/A

Report of Accomplishments

Fiscal Year Accomplishments 2022

Activities 1-4, 2-4 and 3-4

- USCIS will continue to collect and monitor MD-715 awards and compensation data. Ongoing discussions about creating performance award policies will be held.
- As USCIS continues to collect data on time off awards, cash awards, and QSIs and will partner with DHS CRCL/OCHCO to develop best practices.

Fiscal Year Accomplishments 2021

Accomplishments: Activities X-4

- On October 1, 2021, HCT launched Employee Performance Management (EPM) tool, an online tool for completing, routing, signing, and storing performance plans and performance reviews. The system is capable can generate (permission-based) reports for different levels of the organization, region, to local office and at variety points during performance cycle including performance plan creation dates, performance plan stage, signature dates and timestamp, annual rating levels, justifications for incomplete performance plans. By providing real-time data in a variety of formats including Excel, Adobe PDF, pie, or bar graphs, it will better support data analysis processes. (2-4)
- 1-4 date modified to allow time to achieve target.

Fiscal Year Accomplishments 2020

Modifications: Description of the trigger was modified. Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Former activities 1 and 2 were combined. Dates were extended to allow reasonable time to accomplish objectives.

Activities: OEOI met with HCT corporate recruiters to incorporate Schedule A into the hiring process. OEOI and HCT have set timetables for review of all major employment areas starting with merit promotions. 2-4

discussed adding questions to EEO Program Questionnaire for analysis. Also see Parts H7-H9 (measures C.4.a, C.4.c, E.4.a.2 and E.4.a.4).

Fiscal Year Accomplishments 2019

Modifications: Planned activities were updated to include responsible POCs. The statement of the trigger was modified to include time off awards of various amounts of hours. Planned Activity #4 was added to ensure an effective program review and because it will be the inaugural review of the awards program. Activities are pending.

Accomplishments: See Part H. C.4.c. OEOI and HCT have set timetables for review of all major employment areas starting with merit promotions in FY 2020.

Fiscal Year Accomplishments 2018

Modifications: The statement of the objective was modified. Planned activity 1 was modified to initiate an analysis of awards and activity 2 was modified to complete the analysis to build in time to accomplish the objectives. Planned activity 3 was added to integrate benchmarking into the analyses of recognition and awards.

Planned Activity 1:

An initial review of awards was done for this report.

The USCIS Connect site was updated to provide more comprehensive information to all employees including information for managers on awards and recognition. For instance, the following were updated: the Quality Workplace Rewards and Recognition site, Quick Guide for Managers on Effective recognition Practices, Rewards and Recognition FAQs, and Tips from Supervisors to Supervisors on Motivating Employees.

HCT convened a working group, including OEOI, to revamp the Directors Awards program. A new Equal Employment Opportunity and Diversity Excellence Award category was proposed and accepted. The award recognizes an individual or a group that has demonstrated superior commitment to USCIS, furthering its goal to promote a diverse workforce and create a workplace culture of inclusion.

E. **Source of the Trigger:** Other **Specific Workforce Data Table:** Workforce Data Table - B1

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER

Trigger 5. Based on Schedule A workforce data. The agency did not convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS

Barrier Group ~ People with Disabilities and People with Targeted Disabilities

Barrier Analysis Process Completed? No

Barrier(s) Identified? No

STATEMENT OF IDENTIFIED BARRIER

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

Barrier Name ~ Barriers have not been identified. Description of Policy, Procedure, or Practice: N/A

OBJECTIVE(S) AND DATES FOR EEO PLAN

Date Initiated: 10/01/2017 **Target Date:** 09/30/2018

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2022 **Date Completed:** N/A

Objective Description

Examine the reason for the trigger and Increase conversion rates of eligible Schedule A employees into competitive service

Responsible Official(s)

Title / Name / Standards Address the Plan?

- HR Specialist, HCT / Robyn Logsdon / No
- Disability Accommodations Program, Supervisory Equal Employment Specialist, OEOI /Sandra Sutton / No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Planned Activities: 1. OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.

Target Date: 09/30/2018

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2018

Planned Activities: 2. HCT and OEOI will collaborate to review Schedule A processes and identify opportunities for

efficiencies.

Sufficient Staffing & Funding? Yes

Modified Date: N/A

Completion Date: 09/30/2018

Target Date: 09/30/2018

Planned Activities: 3. HCT and OEOI will review and analyze procedures and develop best practices for Schedule A

eligible for conversion who are not converted. (Now activity 1-5).

Sufficient Staffing & Funding? Yes

Modified Date: 12/31/2022 **Completion Date:** N/A

Target Date: 09/30/2019

Planned Activities: 4. OEOI and HCT will collaborate to analyze specific cases of non-conversion to determine reasons

and develop a plan to address discrepancies. (Former activity 3 and 4; Now activity 2-5)

Sufficient Staffing & Funding? Yes

Modified Date: 09/30/2020 **Completion Date**: 09/30/2020

Report of Accomplishments

Fiscal Accomplishments 2022

Activities 1-5 and 2-5

DEIA Strategic Plan Goals 2 (Diversity) and 4 (Inclusion) align with these activities. Monthly reports are sent to hiring office staffing POCs for review and reminders. Non-timely conversions are reviewed by HCT to determine the cause of the delay. Data will continue to be collected and monitored.

Fiscal Accomplishments 2021

Accomplishments: Activities X-5 1-5 date modified to allow time to achieve target.

Fiscal Accomplishments 2020

Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and

Q4. Activities were revised and renumbered to consolidate them. For example, activities 3 and 4 were combined. Dates were extended to allow reasonable time to accomplish objectives.

Activities: HCT and OEOI continued to collaborate to monitor and review Schedule A processes and conversions, identify trends and opportunities for efficiencies including:

- Conducted a review of the FY 2019 non-conversions and identified reasons for non-conversion.
- Discussed plan to address non-conversions. Will review and modify HCT procedure for notification by developing a manager's checklist, updating the HCT Connect page, and marketing the Schedule A program in HCT fora.

Fiscal Accomplishments 2019

Planned Activities 3 and 4: HCT and OEOI began discussions and shared ideas on how to determine reasons for non-conversion and has a working group identified to begin work on this trigger.

Fiscal Accomplishments 2018

Modifications: The statement of the objective was modified for clarity and action plan 4 was initiated to continue to another level of the barrier analysis.

Planned Activity 1 and 2:

A working group was established in FY 2018 to identify best practices and areas where efficiencies may be needed to track the life cycle of Schedule A employees. The group has identified areas in the Schedule A lifecycle where processing may be ineffective and is working on an action plan to address the issues. Reports on "excepted service" employees including Schedule A employees are provided to managers and Selective Placement Coordinator (SPPC) on a monthly basis. The report includes the list of Schedule A employees whose appointments are due for conversion. Also, the SPC will track and contact supervisors directly to discuss employees who are appointed under Schedule A for longer than two years.

Planned Activity 3 (Closed out):

HCT began this process but did not complete it mostly because current HR reporting systems were not capable of generating a single comprehensive report. Separate databases contain different sets of data and required manual tracking to combine the data to make it useful. However, DHS CRCL provided USCIS with Schedule A conversion data for FY 2018 and has agreed to continue extracting and sharing Schedule A data for the foreseeable future. An initial review of the data indicates that not all eligible Schedule A employees were converted (73 were converted out of 109 eligible) for a variety of reasons that are not clear. Further analysis needs to be done in collaboration with HCT to investigate the reasons the specific personnel identified were not converted therefore Planned Activity 4 was initiated.

F. Source of the Trigger: Other

Specific Workforce Data Table: Workforce Data Table - B1

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER

Trigger 6. There are fewer PWD and PWTDs selected than applied to specific career development programs.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS

Barrier Group ~ People with Disabilities and People with Targeted Disabilities Barrier Analysis Process Completed? No Barrier(s) Identified? No

STATEMENT OF IDENTIFIED BARRIER

Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.

Barrier Name ~ Barriers have not been identified. Description of Policy, Procedure, or Practice: N/A

OBJECTIVE(S) AND DATES FOR EEO PLAN

Date Initiated: 10/01/2017 **Target Date:** 09/30/2019

Sufficient Funding / Staffing? Yes

Date Modified: 09/30/2024 **Date Completed:** N/A

Objective Description

Examine the trigger to determine the reasons for the underrepresentation of PWD and PWTD among applicants and selectees for career development programs.

Responsible Official(S)

Title/ Name/ Standards Address the Plan?

- Supervisory Equal Employment Specialist Diversity and Inclusion Division, OEOI / Morenike Ogebe / No
- Human Resources Specialist, HCT /Robyn Logsdon/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2019

Planned Activities: 1. OEOI will coordinate with HCT to benchmark and develop AFD framework for USCIS career

development programs. (Now activity 1-6).

Sufficient Staffing & Funding? Yes

Modified Date: 12/31/2023 **Completion Date**: N/A

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2024

Planned Activities: 2. OEOI will coordinate with HCT to review and analyze career development program policies and

procedures. (Now activity 2-6). **Sufficient Staffing & Funding:** Yes

Modified Date: 09/30/2024. **Completion Date:** N/A

Report of Accomplishments

Fiscal Year Accomplishments 2022

Activities 1-6 and 2-6

DEIA Strategic Plan Goal 3 (Equity) has strategies and activities on improved collection of career data and increased access to career development. Together with the activities in this plan, the quarterly/annual reporting will help ensure targets are met. HCT plans to conduct voluntary surveys at the end of the mentoring program that include questions that allow for self-identification of disability and other demographics.

Fiscal Year Accomplishments 2021

Accomplishments: Activities X-6

1-6 date modified to align with revised activities. Aligns with Part H.6

Fiscal Year Accomplishments 2020

Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Description of the trigger was revised. Dates were extended to allow reasonable time to accomplish objectives.

Activities: See Part H9 (measures E.4.a.2. and E.4.a.4). OEOI will continue to identify, track, and monitor qualifying career development programs and courses that support these programs. In FY 2020, using data from the PALMS system, OEOI identified personnel who participated in courses and cross-walked demographic data from AXIS (NFC). Based on analysis, modified activity 2-6 to examine all career development programs policies and procedures.

Fiscal Year Accomplishments 2019

Modification: Due date for Planned Activity #1 has been pushed back to 9/30/2020. HCT (TCDD) and OEOI will discuss and establish a baseline on required training and career development reporting for USCIS HQ programs. Accomplishments: Data on the USCIS mentoring programs was reviewed in FY 2019. However, further review is needed to determine if all relevant data was properly collected on applicants and selectees throughout the process. Some

initial training/career development policies were identified.

for review. HCT continued to test and discuss Monster Solutions for the potential collection of demographic data in multiple areas including training and career development programs. See Part H E.4.a.2. and E.4.a.4

Fiscal Year Accomplishments 2018

New trigger.

- 1. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.
 - Some planned activities were completed, others are ongoing. FY 2023 enhancements were approved for the EEO and DEIA programs, these enhancements will assist with other barrier analysis in FY 2023.
- 2. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

NA

3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.

NA