

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

<b>SECTION I: EFFORTS TO REACH REGULATORY GOALS .....</b>	<b>2</b>
<b>SECTION II: MODEL DISABILITY PROGRAM .....</b>	<b>3</b>
A. PLAN TO PROVIDE SUFFICIENT & COMPETENT STAFFING FOR DISABILITY PROGRAM .....	3
B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM .....	4
<b>SECTION III: PROGRAM DEFICIENCIES IN THE DISABILITY PROGRAM .....</b>	<b>4</b>
<b>SECTION IV: PLAN TO RECRUIT AND HIRE INDIVIDUALS WITH DISABILITIES .....</b>	<b>4</b>
A. PLAN TO IDENTIFY JOB APPLICANTS WITH DISABILITIES .....	4
B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS .....	7
C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING) .....	7
<b>SECTION V: PLAN TO ENSURE ADVANCEMENT OPPORTUNITIES FOR EMPLOYEES WITH DISABILITIES .....</b>	<b>8</b>
A. ADVANCEMENT PROGRAM PLAN .....	8
B. CAREER DEVELOPMENT OPPORTUNITIES .....	9
C. AWARDS .....	10
D. PROMOTIONS .....	10
<b>SECTION VI: PLAN TO IMPROVE RETENTION OF PERSONS WITH DISABILITIES .....</b>	<b>14</b>
A. VOLUNTARY AND INVOLUNTARY SEPARATIONS .....	14
B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES .....	16
C. REASONABLE ACCOMMODATION PROGRAM .....	16
D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE .....	17
<b>SECTION VII: EEO COMPLAINT AND FINDINGS DATA .....</b>	<b>17</b>
A. EEO COMPLAINT DATA INVOLVING HARASSMENT .....	17
B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION .....	18
<b>SECTION VIII: IDENTIFICATION AND REMOVAL OF BARRIERS .....</b>	<b>18</b>

## 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 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and 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) Answer: No

b. Cluster GS-11 to SES (PWD) Answer: No

\* 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.

a. Cluster GS-1 to GS-10 (PWTD) Answer: No

b. Cluster GS-11 to SES (PWTD) Answer: No

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.

During FY 2017, the agency communicated the 2% onboard goal for PWTD in the:

- Monthly one on one briefings to the Deputy Director on recruitment and retention of PWD, PWTD and veterans with 30% or more disability;
- OEOI Chief briefing of Director on 10/21/2016;
- Agency-wide National Disability Employment Awareness Month Program on 10/25/2016;
- Annual State of EEO Briefing to Director and senior leaders at the Director's Extended Leadership Meeting on 7/11/2017;
- Ten informational briefings on the Workforce Recruitment Program for College

Students with Disabilities (WRP) were conducted by the Disability Employment Program Manager;

- Demographic snapshots including diversity workforce data that were provided to senior leaders within the organization.

## 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 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			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTD	71	9	0	Denise L. Barrett Branch Chief, Recruitment and Placement, HROC Denise.L.Barrett@uscis.dhs.gov  Eric J. Williams Branch Chief, Recruitment and Placement, HROC Eric.J.Williams@uscis.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	71	9	0	Denise L. Barrett Branch Chief, Recruitment and Placement, HROC Denise.L.Barrett@uscis.dhs.gov  Eric J. Williams Branch Chief, Recruitment and Placement, HROC Eric.J.Williams@uscis.dhs.gov
Processing reasonable accommodation requests from applicants and employees	4	0	0	Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI Holly.H.Aguilar@uscis.dhs.gov

Disability Program Task	# of FTE Staff by Employment Status			Responsible Official (Name, Title, Office, Email)
	Full Time	Part Time	Collateral Duty	
Section 508 Compliance	10	0	0	Ken Moser, Branch Chief and Section 508 Coordinator, Kenneth.S.Moser@uscis.dhs.gov
Architectural Barriers Act Compliance	17	0	0	Gina V. Barrett, Division Chief Facilities Management, MGMT Gina.V.Barrett@uscis.dhs.gov
Special Emphasis Program for PWD and PWTD	2	0	96	Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI Holly.H.Aguilar@uscis.dhs.gov

- Has the agency provided disability program staff with sufficient training to carry out their responsibilities during the reporting period? If “yes”, describe the training(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

In FY 2017, although there was no formal disability program training in place for disability program staff, all staff received sufficient on-the-job training and through individual performance work plans and/or IDPs. They attended trainings to enhance their particular job functions and career development. For FY 2018, we will explore the feasibility of a mandatory formal training plan for disability program staff.

**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**

The agency has not reported any program deficiencies involving the disability program.

**Section IV: Plan to Recruit and Hire Individuals with Disabilities**

Pursuant to 29 C.F.R. § 1614.203(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 APPLICANTS WITH DISABILITIES**

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

Over the last fiscal year, USCIS utilized a variety of recruitment strategies designed to increase the number of qualified applicants with disabilities and applicants with targeted disabilities within the major occupations. USCIS has also identified the areas that need to be focused on in order to develop the following multi-pronged and multi-year recruitment strategy for the agency:

- Outreach: The agency used the following programs and resources to identify job applicants including:

- Workforce Recruitment Program for College Students with Disabilities (WRP), Disability Services at Gallaudet University, National Institute for the Deaf at the Rochester Institute of Technology (RIT), California State University, the Deaf and Hard of Hearing DHS employee association, and DOD Operation War Fighter Program (OWF).

- In addition, promoted Schedule A hiring authority, notified PWD and PWTD on job opportunities, gave tips to applicants on how to apply for jobs, and provided resume writing tips. In partnership with Gallaudet University, USCIS conducted mock interviews with deaf and significantly hard of hearing students which introduced managers to qualified persons with targeted disabilities for upcoming positions.

- Recruitment: The agency participated in several career fairs where the targeted hires were veterans and Schedule A applicants. At the DHS Veterans Hiring event in August 2017, more than 60 interviews were conducted, over 500 veteran resumes were collected, and 13 job offers were made. The agency promoted the Summer Enrichment Program vacancy announcement with our disability partnerships to encourage students with disabilities to apply. Collateral duty SEPMs conducted 83 recruitment activities in FY 2017.

Overall in FY 2017, USCIS hired a total of 1,905 new employees, of which 661 (34.70%) are veterans, 310 (16.30%) of them are 30% or more disabled. This positioned USCIS above the DHS new hire goals for veterans (25%) and veterans with disabilities (10%). USCIS also reached and surpassed the 2% hiring and onboarding goal for PWTD at 2.84% and has surpassed the 12% goal for PWD at 19.50%.

#### FY 2018 Plans

USCIS will continue to promote the use of the Schedule A Hiring Authority. The Disability Program Manager and Selective Placement Program Coordinator will work to expand USCIS' relationships with diversity and disabled veteran organizations and accredited colleges and universities. USCIS will continue to participate in outreach and recruitment events in order to share information about the agency's mission and career opportunities. HCT will partner with OEOI to track marketing outreach events that offices hold in which HCT is involved. Braille and large print recruitment materials are being created to share at recruitment events.

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.

USICS utilizes all available and appropriate hiring authorities to recruit and hire PWD and PWTD. HCT participated in numerous hiring events where the targeted audience was individuals eligible under the non-competitive hiring authorities, such as Veterans Recruitment Appointment (VRA), Schedule A disability appointment, and 30% or more

disabled veteran's appointment.

Recruitment strategies include:

- Utilize student educational employment work-study programs, 5 C.F.R. §§ 213.3202(a) and (b)(10)(ii) , "Hiring Authorities for Students with Disabilities"; and veterans preference hiring, including hiring disabled veterans into a Department of Veterans Affairs training program, 5 C.F.R. § 315.604, and preferential hiring of veterans with disability ratings of 30% or more, 5 C.F.R. §§ 316.302(b)(4) and 316.402(b)(4).
- Include language in all vacancy announcements encouraging people with disabilities to apply for jobs, specifically stating that USCIS is recruiting qualified applicants with disabilities.
- Use a Schedule A Hiring Mailbox to advise eligible applicants on how to apply.
- 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.

Schedule A candidates can be considered non-competitively for any vacant position prior to the position being posted. Once the position is posted and until the post closes, Schedule A applicants must apply through USAJobs.

To verify eligibility, the Schedule A applicant must submit documentation from a licensed medical professional (e.g., a physician or other professional certified by a state, DC, or a U.S. territory to practice medicine); a licensed vocational rehabilitation specialist; or any Federal agency or state agency that issues or provides disability benefits (e.g., SSA, VA). The documentation does not need to include the type of disability, just certify that they have it.

Schedule A eligible candidates' certificates are forwarded to hiring officials for consideration. If selected, HCT staff advises hiring officials in more detail on the use of this non-competitive hiring authority. In addition, training sessions and webinars are provided throughout the year to management and hiring point of contacts to spread awareness of the use of hiring authorities throughout USCIS.

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 had a total of 2,717 supervisors and managers at the end of FY 2017. HCT requires a mandatory bi-annual online training on "A Roadmap to Success:

Hiring, Retaining and Including People with Disabilities” for supervisors, managers and HR professionals. This is a 45-minute online training module that is designed to help managers and supervisors learn how to best tap into one of the most underutilized segments of the U.S. workforce —veterans and persons with disabilities. In addition, HCT and the Office of Equal Opportunity and Inclusion (OEOI) conducted many training sessions both in person and through webinars, and other formats on the various non-competitive hiring authorities for hiring managers. For example:

- WRP training
- Use of Schedule A Hiring Authority training

## **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 continued to partner with disability organizations and educational institutions, such as the National Institute for the Deaf at Rochester Institute of Technology, Gallaudet University, California State University at Northridge, and the DHS Deaf and Hard of Hearing Employee Association, to promote USCIS as an employer of choice in the recruitment of qualified candidates with disabilities.

To further leverage those partnerships, USCIS participated in activities and events at those organizations. For example, USCIS managers conducted mock interviews at Gallaudet University for the third consecutive year which provided deaf and hard of hearing students with an opportunity to practice interviewing skills. USCIS also participated in the Operation Warfighter (OWP) Internship Career Fair and recruited one intern. USCIS developed standard OWP operating procedures and guidelines for USCIS hiring managers that provide an in-depth explanation of recruiting, mentoring, and coaching within that program.

In FY 2018, USCIS plans to develop an outreach toolkit for its 96 collateral duty Special Emphasis Program Managers (SEPMs) in order to facilitate nationwide efforts in establishing and cultivating partnerships with educational institutions and a goal of forming three new partnerships was set.

## **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

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.

a. New Hires for MCO (PWD)      Answer: No

b. New Hires for MCO (PWTD)      Answer: Yes

In comparison to the benchmarks, triggers exist for PWTD (1.59%) among new hires for the Management Program Analyst (0343) position in FY 2017.

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.

a. Qualified Applicants for MCO (PWD)      Answer: No

b. Qualified Applicants for MCO (PWTD)      Answer: No

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

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.

a. Promotions for MCO (PWD)      Answer: No

b. Promotions for MCO (PWTD)      Answer: No

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

## 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.

In FY 2017, the agency engaged in several initiatives designed to ensure employees with disabilities and employees with targeted disabilities had sufficient advancement opportunity. For example:

- The agency promoted its mentoring programs for employees and for supervisors with less than two years of experience. These programs provided eligible employees with a mentor for ten months to assist in their career development. Total participation was 22 supervisors and 86 employees.
  - The agency collaborated with the Deaf and Hard of Hearing DHS Employee Association to assist with promoting recruitment and career advancement within USCIS. For example, the group sent all career development training opportunities to deaf and hard of hearing employees throughout USCIS.
- In FY 2018, USCIS will continue to engage in the efforts identified above.

## B. CAREER DEVELOPMENT OPPORTUNITIES

1. Please describe the career development opportunities that the agency provides to its employees.

The agency provides the following career development opportunities through HCT:

- Leadership Education and Development (LEAD) Program (Aspiring Leader Program, New Leader Program, Executive Leadership Program, Naval Postgraduate School Master's Degree Program, OPM President's Management Council Intra-agency Rotations Program, etc.)
  - Coaching program
  - Mentoring Program
  - Homeland Security Investigations-Forensic Lab Training Program
  - Pathways Program that includes: Internship, Recent Graduate, and Presidential Management Fellowship

The Professional Development Program (PDP) provides over two Million dollars in funding to cover the cost of eligible career- or job-related training for USCIS employees.

In addition, several DPOs have organized specific mentoring programs for their employees.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

a. Applicants (PWD)

Answer: No

b. Selections (PWD)

Answer: No

USCIS does not currently track applicant flow data on career development programs distributed by disability.

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.)

If "yes", describe the trigger(s) in the text box.

- |                      |            |
|----------------------|------------|
| a. Applicants (PWTD) | Answer: No |
| b. Selections (PWTD) | Answer: No |

USCIS does not currently track applicant flow data on career development programs distributed by disability.

### 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

In FY 2017, the agency identified a trigger involving the percentage of PWD and PWTD who received time-off awards and cash awards:  
 PWD total time-off awards of 9+ hours was 35.28%, as compared to the rate awarded to persons without disabilities which was 44.47%. PWTD total time-off awards of 9+ hours was 31.49% as compared to the rate awarded to persons without targeted disabilities which was 42.62%.  
 PWD total Cash Awards of \$500+ was 50.70% as compared to the rate awarded to persons without disabilities which was 64.48%. PWTD total Cash Awards of \$500+ was 48.30% as compared to the rate awarded to persons without targeted disabilities which was 61.39%.

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: Yes
b. Pay Increases (PWTD)	Answer: Yes

In FY 2017, the agency identified a trigger involving the percentage of PWD and PWTDs who received QSIs. PWD QSIs awarded was 1.18% as compared to the rate awarded to persons without disabilities which was 1.65%. PWTD QSIs awarded was 1.28% as compared to the rate awarded to persons without targeted disabilities which was 1.56%.

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: N/A
b. Other Types of Recognition (PWTD)	Answer: N/A

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

### 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.
  - a. SES
    - i. Qualified Internal Applicants (PWD) Answer: No
    - ii. Internal Selections (PWD) Answer: No
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWD) Answer: No
    - ii. Internal Selections (PWD) Answer: No
  - c. Grade GS-14
    - i. Qualified Internal Applicants (PWD) Answer: No
    - ii. Internal Selections (PWD) Answer: No
  - d. Grade GS-13
    - i. Qualified Internal Applicants (PWD) Answer: No
    - ii. Internal Selections (PWD) Answer: No

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

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.
  - a. SES
    - i. Qualified Internal Applicants (PWTD) Answer: No
    - ii. Internal Selections (PWTD) Answer: No
  - b. Grade GS-15
    - i. Qualified Internal Applicants (PWTD) Answer: No
    - ii. Internal Selections (PWTD) Answer: No
  - c. Grade GS-14
    - i. Qualified Internal Applicants (PWTD) Answer: No

- |   |            |
|---|------------|
| ii. Internal Selections (PWTD)          | Answer: No |
| d. Grade GS-13                          |            |
| i. Qualified Internal Applicants (PWTD) | Answer: No |
| ii. Internal Selections (PWTD)          | Answer: No |

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

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.
- |                             |            |
|-----------------------------|------------|
| a. New Hires to SES (PWD)   | Answer: No |
| 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 |

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

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.
- |                              |            |
|------------------------------|------------|
| a. New Hires to SES (PWTD)   | Answer: No |
| b. New Hires to GS-15 (PWTD) | Answer: No |
| c. New Hires to GS-14 (PWTD) | Answer: No |
| d. New Hires to GS-13 (PWTD) | Answer: No |

USCIS is currently unable to validate the Applicant Flow Data required to respond to this question.

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.

a. Executives

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWD) Answer: No

ii. Internal Selections (PWD) Answer: No

USCIS does not currently collect this data.
---

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.

a. Executives

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

b. Managers

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

c. Supervisors

i. Qualified Internal Applicants (PWTD) Answer: No

ii. Internal Selections (PWTD) Answer: No

USCIS does not currently collect this data.
---

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.
- |                                    |            |
|------------------------------------|------------|
| a. New Hires for Executives (PWD)  | Answer: No |
| b. New Hires for Managers (PWD)    | Answer: No |
| c. New Hires for Supervisors (PWD) | Answer: No |

USCIS does not currently collect this data.
---

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.
- |                                     |            |
|-------------------------------------|------------|
| a. New Hires for Executives (PWTD)  | Answer: No |
| b. New Hires for Managers (PWTD)    | Answer: No |
| c. New Hires for Supervisors (PWTD) | Answer: No |

USCIS does not currently collect this data.
---

## Section VI: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal 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

HCT tracks individuals who are on an excepted service appointment including those on a Schedule A appointment and provides reports to offices for their action. The Human Resources Operations Center (HROC) advises managers when a person is eligible for conversion to a competitive service appointment. Managers are responsible for conversion or any further action. Any termination requests must go through Labor and Employee Relations (LER). USCIS does not currently track reasons for non-conversion however we are developing a plan to address this deficiency.

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

b. Involuntary Separations (PWD)

Answer: Yes

Using the inclusion rate, triggers exist for PWD (5.49%) who voluntarily separated from the agency, as compared to the rate of persons without disabilities (3.77%). Using the inclusion rate, triggers exist for PWD (0.47%) who involuntarily separated from the agency, as compared to the rate of persons without disabilities (0.23%).

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: No

b. Involuntary Separations (PWTD)

Answer: No

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.

FY 2017 USCIS exit survey results indicate that 84/643 (13.06%) exiting employees self-identified as PWD. The top reasons PWDs gave for leaving were: moving to another DHS component, personal and family related, supervisor or management, and other/miscellaneous.

In addition, the FY 2016 EEO and Diversity Climate Survey results indicate that:

- PWDs who responded that they witnessed or experienced discrimination/harassment on the basis of disability indicated that the issues were most often related to work assignments, promotion/selection, and harassment.
  - PWDs were less satisfied with the handling of issues of discrimination/harassment than persons without disabilities.
  - PWDs were more likely to leave their current position than persons without disabilities. 40.00% of PWD responded that they were not considering leaving

compared with 55.00% of persons without disabilities.

## B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 C.F.R. § 1614.203(d)(4), federal agencies are required to inform job 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.

USCIS does not currently meet this requirement but is planning to address this deficiency in FY 2018.

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 does not currently meet this requirement but is planning to address this deficiency in FY 2018.

## 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.)

In FY 2017, the average time frame for processing initial requests for reasonable accommodations was 17 business days.

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.



USCIS continues to administer a central accommodation fund as a means of removing any financial disincentive to supervisors and managers in hiring, retaining, or promoting persons with disabilities. USCIS processed 674 requests for accommodations in FY 2017 and the average number of processing days was 17. Current USCIS policy provides that accommodation requests are to be processed within 20 business days absent extenuating circumstances. Additionally, the USCIS Disability Accommodation Program, in partnership with the EEOC, continued providing mandatory disability accommodation training for new supervisors and 740 supervisors were trained.

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

Pursuant to 29 C.F.R. § 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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

USCIS does not currently have separate policies to implement the Personal Assistance Services requirement. PAS are addressed under the agency's reasonable accommodation policies and procedures. The agency is working on contract services to satisfy personal services needs of employees.

## **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 government-wide 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 22 out of 89 formal complaints filed (24.72%) which is higher than the government-wide average of 14.23%.
- In response to question two, there were 9 settlement agreements and there was one finding.

The following corrective actions were taken by the agency:

- \$25,000 in non-pecuniary damages;
  - Provided the Responsible Management Officials and complainant’s co-worker with EEO training on unlawful harassment and unlawful retaliation;
- Posted a notice of finding of discrimination to USCIS employees at the field office.

**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 response to question one, PWDs filed 16 complaints based on reasonable accommodation out of 89 total complaints filed (17.97%) which is higher than the government-wide average of 9.74%.
- In response to question two, there were 9 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: No

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

Answer: N/A

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.

<b>Trigger 1</b>	Persons with targeted disabilities are hired at lower rates in one of the top five major occupational series - 0343 Management Program Analyst - as compared with the qualified applicant pool.
<b>Barrier(s)</b>	

<b>Objective(s)</b>	Examine the trigger to determine the reasons why persons with targeted disabilities are hired at lower rates in the identified series.			
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI		Yes		
Angelia Neal, Branch Chief, HR Policy and Performance Management, HCT		Yes		
Danyale Corradi, Division Chief, Policy, Planning and Resources, OEOI		Yes		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
No		No		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Table B7		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2018	OEOI and HCT will partner to identify and implement strategies to increase recruitment of PWTD.	Yes		
09/30/2018	Monitor applicant data of PWTD in major occupations to identify trends.	Yes		
09/30/2018	Develop a Quick Reference Guide for Disability hiring for managers.	Yes		
09/30/2018	Develop and conduct a pilot program to identify entry level and promotional opportunities for PWDs.	Yes		

09/30/2018	OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach Plan (CROP).	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

<b>Trigger 2</b>	A higher number of PWD voluntarily and involuntarily separated from the agency than persons without disabilities.
<b>Barrier(s)</b>	
<b>Objective(s)</b>	Examine the trigger to determine the reasons why PWD are separating from the agency at higher rates than persons without disabilities.

<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>
Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI	Yes
Danyale Corradi, Division Chief, Policy, Planning and Resources, OEOI	Yes
Angelia Neal, Branch Chief, HR Policy and Performance Management, HCT	Yes

<b>Barrier Analysis Process Completed? (Yes or No)</b>	<b>Barrier(s) Identified? (Yes or No)</b>
No	No

<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>
Workforce Data Tables	Yes	Tables B1 & B14
Complaint Data (Trends)	No	
Grievance Data (Trends)	No	
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No	
Climate Assessment Survey (e.g., FEVS)	Yes	USCIS FY16 EEO & Diversity Climate Survey
Exit Interview Data	Yes	USCIS FY17 Exit survey results
Focus Groups	No	
Interviews	No	
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No	
Other (Please Describe)	No	

<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>

09/30/2018	OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.	Yes		
09/30/2018	Monitor separation data of PWD to identify trends.	Yes		
09/30/2018	Monitor exit survey results for separation trends of PWD.	Yes		
09/30/2018	Review tracking of ERI in career development programs.	Yes		
09/30/2018	Conduct third bi-annual EEO Climate Survey.	Yes		
09/30/2019	Continue to partner with DHS and OPM to develop best practices to access and track applicant flow data for internal promotions and career development.	Yes		
09/30/2019	Update analysis of merit promotions for indications of barriers.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

<b>Trigger 3</b>	The percentage of PWD that alleged harassment and failure to provide a reasonable accommodation in formal EEO complaints filed is higher than the government-wide average of 14.23% and 9.74%, respectively.		
<b>Barrier(s)</b>			
<b>Objective(s)</b>	Examine the trigger to determine the reason for the high occurrence of harassment complaints and complaints based on failure to provide a reasonable accommodation.		
<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>	
Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI		Yes	
Rebecca Arsenault-Herize, Division Chief, Complaints Resolution, OEOI		Yes	
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>	
No		No	
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>	
Workforce Data Tables	No		
Complaint Data (Trends)	Yes	FY 17 462 Report PWD data	
Grievance Data (Trends)	No		
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	Yes	FY 17 EEO findings	
Climate Assessment Survey (e.g., FEVS)	No		

Sources of Data		Sources Reviewed? (Yes or No)	Identify Information Collected		
Exit Interview Data		No			
Focus Groups		No			
Interviews		No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)		No			
Other (Please Describe)		No			
Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)	
09/30/2018	Review and monitor harassment and reasonable accommodation complaints by PWD and identify trends.	Yes			
03/31/2018	Issue a new EEO policy statement with strong language on anti-harassment.	Yes			
09/30/2019	Review the reasonable accommodations process and identify opportunities for efficiencies.	Yes			
09/30/2018	Identify and implement ways to educate managers on prevention of harassment, discrimination, and reprisal.	Yes			
09/30/2018	Create and implement an Anti-Bullying initiative.	Yes			
Fiscal Year	Accomplishments				

<b>Trigger 4</b>	The agency did not convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service
<b>Barrier(s)</b>	
<b>Objective(s)</b>	Examine the trigger to determine the reasons why not all eligible Schedule A employees are converted into competitive service.
Responsible Official(s)	Performance Standards Address the Plan? (Yes or No)
Holly Hadfield Aguilar, Chief, Diversity Management Operations, OEOI	Yes
Angelia Neal, Chief, HR Policy and Performance Management Branch, HCT	Yes
Danyale Corradi, Chief, Policy, Planning and Resources, OEOI	Yes
Barrier Analysis Process Completed? (Yes or No)	Barrier(s) Identified? (Yes or No)

<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
No		No		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Schedule A employees and Conversions		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	Yes	HRIS data on Schedule A employees and conversions		
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2018	OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.	Yes		
09/30/2018	HCT will develop a mechanism for tracking Schedule A appointees after conversion eligibility to identify reasons for non-conversion.	Yes		
09/30/2018	HCT will review Schedule A processes and identify opportunities for efficiencies.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			

<b>Trigger 5</b>	PWD and PWTD received less time off awards of nine or more hours, cash awards of \$500 or more, and Quality Step Increases (QSIs) as compared with persons without disabilities and persons without targeted disabilities.
<b>Barrier(s)</b>	
<b>Objective(s)</b>	Examine the trigger to determine the reason for the lower rates of awards and QSIs for PWD and PWTD.
<b>Responsible Official(s)</b>	<b>Performance Standards Address the Plan? (Yes or No)</b>

<b>Responsible Official(s)</b>		<b>Performance Standards Address the Plan? (Yes or No)</b>		
Angelia Neal, Branch Chief, HR Policy and Performance Management, HCT		Yes		
Holly Hadfield Aguilar, Division Chief, Diversity Management Operations, OEOI		Yes		
Danyale Corradi, Division Chief, Policy, Planning and Resources, OEOI		Yes		
<b>Barrier Analysis Process Completed? (Yes or No)</b>		<b>Barrier(s) Identified? (Yes or No)</b>		
No		No		
<b>Sources of Data</b>	<b>Sources Reviewed? (Yes or No)</b>	<b>Identify Information Collected</b>		
Workforce Data Tables	Yes	Tables B1 & B13		
Complaint Data (Trends)	No			
Grievance Data (Trends)	No			
Findings from Decisions (e.g., EEO, Grievance, MSPB, Anti-Harassment Processes)	No			
Climate Assessment Survey (e.g., FEVS)	No			
Exit Interview Data	No			
Focus Groups	No			
Interviews	No			
Reports (e.g., Congress, EEOC, MSPB, GAO, OPM)	No			
Other (Please Describe)	No			
<b>Target Date (mm/dd/yyyy)</b>	<b>Planned Activities</b>	<b>Sufficient Staffing &amp; Funding (Yes or No)</b>	<b>Modified Date (mm/dd/yyyy)</b>	<b>Completion Date (mm/dd/yyyy)</b>
09/30/2018	OEOI and HCT will collaborate with HCT to monitor and review time off awards, cash awards and QSIs.	Yes		
09/30/2019	OEOI and HCT will collaborate with HCT to complete a trend analysis of the awards system.	Yes		
<b>Fiscal Year</b>	<b>Accomplishments</b>			



4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

The planned activities are new for the FY17 report.

5. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).

The planned activities are new for the FY17 report.

6. 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.

The planned activities are new for the FY17 report.