

## 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) 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 2019, the agency communicated the 2% onboard goal for PWTD in: - Meetings and communications with collateral duty special emphasis program managers and their managers. - Demographic snapshots including diversity workforce data provided to senior leaders. - Monthly meetings between the OEOI Chief and the Acting Deputy Director. - Meetings between the OEOI Chief and senior leaders from USCIS directorates and program offices. - The Annual State of EEO Briefing to the Acting Director and senior leaders on 9/10/2019. - A Recruiting, Hiring, and Retaining Persons with Disabilities training for managers initiated 08/27/2019. - Ad hoc training sessions by HCT and OEOI on non-competitive hiring authorities for hiring managers.

### 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)
Processing applications from PWD and PWTD	80	9	0	Eric.J.Williams@uscis.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	80	9	0	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
Section 508 Compliance	10	0	0	Ken Moser Branch Chief and Section 508 Coordinator
Architectural Barriers Act Compliance	17	0	0	Gina.V.Barrett@uscis.dhs.gov
Special Emphasis Program for PWD and PWTD	1	0	102	Holly Hadfield Aguilar Division Chief, Diversity Management Operations, OEOI

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 2019, all staff received training, including the EEOC EXCEL training conference, Federally Employed Women’s national training program, Federal Leadership in Diversity & Inclusion certificate program, the Upper Midwest Employment Law Institute, and Americans with Disabilities Act training sponsored by DHS CRCL.

**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**

## 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 APPLICATIONS WITH DISABILITIES

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

USCIS utilized a variety of outreach and recruitment strategies to increase the number of qualified applicants with disabilities and targeted disabilities. In FY 2019, USCIS: - Promoted the use of the Workforce Recruitment Program for College Students with Disabilities (WRP) to hiring managers, Human Resources Specialists, and special emphasis program managers; - Leveraged collateral-duty special emphasis program managers to conduct outreach and recruitment efforts with disability organizations and educational institutions; - Continued to promote USCIS as an Employer of Choice through social media platforms, including Handshake, ABC Career Center, Go Law Enforcement, and the Warriors to Work job board; - Participated in 128 career fairs and outreach events and targeted active duty or transitioning military and persons with disabilities and targeted disabilities; - Continued to refer disabled veteran's resumes to hiring managers to support veteran hiring goals; - Promoted and used the Operation Warfighter and Wounded Warrior programs to fill temporary appointments; - Promoted the use of non-paid work experience internships that provide eligible veterans and service members who participate in the VA's Vocational Rehabilitation and Employment Program the opportunity to obtain concurrent training and practical job experience; and - Developed and widely distributed recruitment materials at each recruitment outreach event to promote the use of special hiring authorities for persons with disabilities (Schedule A), which was adapted for use by other DHS components and other federal agencies. FY 2020 Plans USCIS will continue to expand its relationships with various organizations, including disabled veteran organizations and colleges and universities. USCIS will also participate in outreach and 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

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. In FY 2019, USCIS hired 2,047 new employees, of which 272 (13.29%) were 30% or more disabled veterans which was above the DHS 10% new hire goals for veterans with disabilities. There were 68 individuals hired using Schedule A (3.32%). USCIS has the largest Schedule A workforce of at DHS with 249 of the department's 930 Schedule A hires (26.77%). The agency used hiring authorities that take disability into account in the following ways: - 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; - Provided reasonable accommodation and work life information to PWD and veteran applicants during the recruitment process by posting vacancy announcements on the USCIS website. Information on the Computer/Electronic Accommodations Program (CAP) is also made available to managers who are addressing employee accommodation requests; - Utilized student educational employment work-study programs, "Hiring Authorities for Students with Disabilities"; veterans preference hiring, including hiring disabled veterans into a VA training program, and preferential hiring of veterans with disability ratings of 30% or more; - Included language in all vacancy announcements encouraging people with disabilities to apply for jobs, specifically stating that USCIS is recruiting qualified applicants with disabilities; - Used the Schedule A Hiring Mailbox to advise eligible applicants about how to apply; and - Encouraged 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 are considered non-competitively for any vacant position prior to the position being posted. Once the position is posted and until it closes, Schedule A applicants must apply through USAJobs. To verify eligibility, the Schedule A applicant must submit documentation from a licensed medical professional, a licensed vocational rehabilitation specialist, or any Federal agency or state agency that issues or provides disability benefits (e.g., SSA, VA) certifying they have a disability. Schedule A eligible candidate

certificates are forwarded to hiring officials for consideration. If selected, HCT staff advises hiring officials in more detail about the use of this non-competitive hiring authority. Also, site visits, training sessions and webinars are provided to managers and hiring points of contacts to increase awareness of these authorities.

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 biennial online training titled “A Roadmap to Success: Hiring, Retaining and Including People with Disabilities” for supervisors, managers, and HR professionals. - Training on the Schedule A hiring authority upon request; - 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; and - 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.

As highlighted in Section III.A.4., in FY 2019, USCIS continued to partner with multiple disability organizations and educational institutions as well as forming new partnerships. USCIS continued to leverage these partnerships by participating in activities and events with them including: - The Veterans Employment Program Manager (VEPM) worked closely with HR specialists to provide supervisors with step-by-step instruction on how to on-board Operation Warfighter Volunteers. - Promoted the Workforce Recruitment Program (WRP) Recruiter Program with eight (8) employees registered to be WRP recruiters. - The Selective Placement Program Coordinator (SPPC) established a network with VA VR&E POCs in different geographic locations to promote the use of non-paid work experience, which provides veterans with service-connected disabilities more opportunities to prepare for, find, and maintain a job. - The SPPC participated in the Federal Exchange on Employment and Disability Working Group which develops resources that federal agencies can use to improve hiring processes for individuals with disabilities and identify issues that present the most challenge to PWD. - The SPPC participated in an Agency Talent Portal (ATP) demo conducted by OPM. The ATP potentially could help identify Schedule A applicants whose resumes are built and marked as searchable in USA Staffing.

**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. 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

Table B6-1 reveals the following triggers: 0930 - PWTD New Hires where the qualified applicant pool is 2.52% (8/317 total qualified) but the selection rate was 2.09% (4/191 total selected). 2210 - PWTD New Hires where the qualified applicant pool is 2.65% (15/567 total qualified) but the selection rate was 0.00% (0/19 selected).

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. Identifying which current employees would qualify for a job series they are not currently in is a difficult undertaking. 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 reveals the following triggers among PWTD:  
 1801 – 2.71% Qualified applicants (659/24,341 total qualified) vs. 2.57% internal promotion selectees (82/3,188 total selections).  
 0301 – 4.14% Qualified applicants (369/8,910 total qualified) vs. 3.63% internal promotion selectees (19/523 total selections). 0343 – 4.23% Qualified applicants (218/5,159 total qualified) vs. 4.17% internal promotion selectees (9/216 total selections). 1802 – 3.70% Qualified applicants (66/1,783 total qualified) vs. 3.39% internal promotion selectees (13/384 total selections). 2210 – 3.07% Qualified applicants (11/358 total qualified) vs. 0.00% internal promotion selectees (0/17 total selections).

## **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 the following means: 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 2019, the agency continued to engage in initiatives designed to ensure employees with disabilities and employees with targeted disabilities had sufficient advancement opportunities. For example: - USCIS promoted its mentoring programs for employees and for supervisors with less than two years of experience. There were 151 mentors and 176 protégés selected for the overall program. Of the total number of selectees, three (1.99%) mentors were PWTDs and four (2.27%) proteges were PWTD and 26 (17.22%) mentors were PWD and 27 (15.34%) proteges were PWD. [Exclusive of 30% Vets and Schedule A employees who otherwise did not self-identify]; and - USCIS collaborated with the Deaf and Hard of Hearing DHS Employee Association to assist with promoting recruitment and career advancement within USCIS. In FY 2020, USCIS will continue to engage in the efforts identified above.

### **B. CAREER DEVELOPMENT OPPORTUNITES**

- 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 (GS 4-6), New Leader Program (GS 7-11), Executive Leadership Program (GS 11-13), Naval Postgraduate School Master’s Degree Program, OPM President’s Management Council Intra-Agency Rotations Program (GS 13-15), etc.); - Coaching program; - Mentoring program (supervisors and non-supervisors); - Homeland Security Investigations- Forensic Lab Training Program; - Pathways program that includes Internship, Recent Graduate, and Presidential Management Fellowship; and - Fundamentals of Mission Support Training (FMST). Of the programs identified, only the LEAD and mentoring programs involve a selection process (are competitive or 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	Total Participants Applicants (#)	Total Participants Selectees (#)	PWD Applicants (%)	PWD Selectees (%)	PWTD Applicants (%)	PWTD Selectees (%)
Coaching Programs	0	0	0	0	0	0
Fellowship Programs	0	0	0	0	0	0
Detail Programs	0	0		0	0	0
Mentoring Programs	339	339	15.93	15.93	2.36	2.36
Other Career Development	56	56	12.50	12.50	5.36	5.36
Training Programs	375	375	14.13	14.13	3.20	3.20
Internship Programs	0	0	0	0	0	0

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 No
- b. Selections (PWD) Answer No

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 No
- b. Selections (PWTD) Answer No

**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

A review of Tables B1 and B9-1 reveals triggers involving the percentage of PWD and PWTDs who receive time off awards of 11- 30 hours and cash awards of \$501- \$5,000 or more. 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.

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

A review of Tables B1 and B9-1 reveals a trigger involving the percentage of PWD and PWTD who received a quality step increase.

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 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. 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 No
- 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) Answer N/A
  - ii. Internal Selections (PWD) Answer No
- d. Grade GS-13
  - i. Qualified Internal Applicants (PWD) Answer N/A
  - ii. Internal Selections (PWD) Answer No

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

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)	Answer No
b. Grade GS-15	
i. Qualified Internal Applicants (PWTD)	Answer N/A
ii. Internal Selections (PWTD)	Answer No
c. Grade GS-14	
i. Qualified Internal Applicants (PWTD)	Answer N/A
ii. Internal Selections (PWTD)	Answer Yes
d. Grade GS-13	
i. Qualified Internal Applicants (PWTD)	Answer N/A
ii. Internal Selections (PWTD)	Answer Yes

Based on Table B7-1, the percentage of PWTD among: Internal selectees for promotion at grade GS-14 (1.10%) (4/363 of total selectees) fell below the qualified applicant pool (1.77%) (116/6,548 of total qualified); and Internal selectees for promotion at grade GS-13 (2.88%) (25/869 of total selectees) fell below the qualified applicant pool (3.06%) (214/7,004 of total qualified). Relevant applicant pool data is not available to properly validate qualified internal applicants.

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 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

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 No
b. New Hires to GS-15 (PWTD)	Answer Yes
c. New Hires to GS-14 (PWTD)	Answer No
d. New Hires to GS-13 (PWTD)	Answer No



Based on Table B7-1, the percentage of PWTD among the new hires at grade GS-15 (0%) (0/19 total new hires) fell below the qualified applicant pool (2.49%) (15/603 total qualified).

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) Answer N/A
    - ii. Internal Selections (PWD) Answer N/A
  - b. Managers
    - i. Qualified Internal Applicants (PWD) Answer N/A
    - ii. Internal Selections (PWD) Answer N/A
  - c. Supervisors
    - i. Qualified Internal Applicants (PWD) Answer N/A
    - ii. Internal Selections (PWD) Answer N/A

USCIS does not currently collect AFD by managerial level.

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) Answer N/A
    - ii. Internal Selections (PWTD) Answer N/A
  - b. Managers
    - i. Qualified Internal Applicants (PWTD) Answer N/A
    - ii. Internal Selections (PWTD) Answer N/A
  - c. Supervisors
    - i. Qualified Internal Applicants (PWTD) Answer N/A
    - ii. Internal Selections (PWTD) Answer N/A

USCIS does not currently collect AFD by managerial level.

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 N/A
- b. New Hires for Managers (PWD) Answer N/A
- c. New Hires for Supervisors (PWD) Answer N/A

USCIS does not currently collect AFD by managerial level.

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 N/A
- c. New Hires for Supervisors (PWTD) Answer N/A

USCIS does not currently collect AFD by managerial level.

## **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 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 does track individuals who are on an excepted service appointment including those on a Schedule An 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. USCIS does not currently track reasons for non-conversion. In FY 2019, USCIS converted 21 Schedule A employees out of 79 who were eligible. Of those converted, 10 were converted non-competitively after two years of satisfactory service, 10 converted to career or career conditional before two years of service, and one was converted by other means. USCIS acquired the data to track employees who have not converted from DHS CRCL. OEOI and HCT are working to address this and other Schedule A triggers/deficiencies and will more closely monitor the progress of Schedule A appointments, separations, and conversions.

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

A review of Table B-1 was conducted. A trigger exists concerning the rate at which PWD voluntarily separated from the agency (4.73% - 187/3,955) as compared to the rate at which Persons Without Disabilities did (3.49% - 502/14,364). A trigger also exists for PWD who involuntarily separated (3.06% - 1/3,955) as compared with the rate of Persons Without Disabilities (1.16% - 167/14,364). Note: The inclusion rate of PWD/PWTD who separated is calculated by dividing the number of PWD/PWTD who separated by their total number in the permanent workforce and then multiplying by 100. Then the rate is compared to the corresponding inclusion rate of PWOD/PWOTD who separated. If the rate of separation of PWD/PWTD is higher, there is a trigger.

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

A review of Table B-1 was conducted. Using the inclusion rate, triggers exist for PWTD who voluntarily separated from the agency (6.61% - 36/545) as compared to the rate of Persons Without Targeted Disabilities (4.86% - 671/13,819). Triggers also exist for PWTD who involuntarily separated (3.67% - 20/545) as compared with the rate of Persons Without Targeted Disabilities (2.06% - 285/13,819).

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 2019 USCIS exit survey was limited due to a change in surveying method during the FY (there were 5 of 53 respondents who indicated they had a disability and only three who indicated they had a targeted disability). The limited responses show that the reasons PWD gave for separating from the agency included: retiring, diversity/inclusion, advancement opportunities, and none. The reasons PWTD gave for leaving included “none” and “diversity and inclusion.” FY 2018 EEO and Diversity Climate Survey results indicate that of respondents who self-identified as persons with disabilities, 34% were considering leaving their current position to retire, for a job elsewhere in the Federal government, for a job in the private sector, or other. By comparison, 23% of persons who self-identified as not having disabilities considered leaving for the same reasons.

**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.

A plan is in place to add automatic door openers over the next few years to buildings which do not already have them in accordance with the Customer Disability Access Plan. This will include front entrances, public restrooms, and naturalization ceremony rooms.

In FY 2020, the openers will be installed in approximately 20 facilities.

**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 2019 because a DHS operated system used for tracking was updated and, as a result, reporting capabilities have been negatively impacted. USCIS is researching alternative systems that will enable it to accurately report this information.

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 utilizes a central accommodation fund to facilitate the purchase of approved accommodations. In FY 2019, USCIS processed 895 requests for accommodations. Additionally, USCIS, in partnership with the EEOC, continued providing mandatory disability accommodation training for new supervisors with 359 supervisors trained. The program also trained an additional 516 supervisors on reasonable accommodation through a partnership between OEOI and the Training and Career Development Division (TCDD) as part of the USCIS Leadership Lessons Series (LLS). As noted earlier, USCIS hopes to deploy a new tracking system in FY 2020 to improve data integrity and reporting capabilities.

**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.

**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 27 out of 115 formal complaints (23.47%) which is higher than the government-wide average of 19.69%. In response to question two, there were 11 settlement agreements and no findings of discrimination.

**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 27 complaints raising alleged failure to reasonably accommodate out of 115 total complaints (23.47%), which is higher than the government-wide average of 13.53%. - In response to question two, there were 11 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

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Trigger 1. Lower than expected participation among new hires with targeted disabilities in selected MCOs as compared to the qualified applicant pool, lower than expected representation of persons with targeted disabilities among employees promoted to selected MCOs; and underrepresentation of persons with disabilities and targeted disabilities among new hires and qualified internal applicants and selectees for promotions to certain senior grade levels.

**STATEMENT OF BARRIER GROUPS:**

Barrier Group – People with Disabilities; People with Targeted Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

**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. NA

**Objective**

Examine the reason for the trigger

**Date Objective Initiated:** October 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2018

**Responsible Officials**

Angelia Neal Chief, HR Policy and Performance Management, HCT

Danyale Corradi Division Chief, Policy, Planning and Resources, OEOI

Holly Hadfield Aguilar Division Chief, Diversity Management Operations, OEOI

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	1. OEOI and HCT will partner to identify and implement strategies to increase recruitment of PWTD.	Yes		09/30/2018
09/30/2018	2. OEOI will monitor applicant data of PWTD in major occupations to identify trends.	Yes		09/30/2018
09/30/2018	3. OEOI will develop a Quick Reference Guide for Disability hiring for managers.	Yes	09/30/2019	09/30/2019
09/30/2018	4. OEOI will develop and conduct a pilot program to identify entry level and promotional opportunities for PWDs.	Yes	09/30/2020	
09/30/2018	5. OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach Plan (CROP).	Yes		09/30/2018
9/30/2019	6.OEOI and HCT will collaborate to monitor and review promotions and identify trends.	Yes	9/30/2020	
09/30/2019	7. OEOI and HCT will collaborate to develop a plan to review policies, practices and procedures related to promotion.	Yes	09/30/2020	
09/30/2020	8. OEOI and HCT will review and analyze results of the Merit Promotion study.	Yes	03/31/2021	
09/30/2020	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.	Yes	09/30/2021	
09/30/2021	10. OEOI will develop a disability demographic snapshot and distribute to HCT and senior leadership.	Yes		

**Fiscal Year 2019 Accomplishments:**

Modifications: Updated planned activities to include responsible POCs. The trigger statement was combined with former trigger #6 to more effectively address the triggers together; 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 workforce.

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 2018 Accomplishments:**

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 in order 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.

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as 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.

**STATEMENT OF A BARRIER GROUPS:**

Barrier Group – People with Disabilities; People with Targeted Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

**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. NA

**Objective**

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.

**Date Objective Initiated:** Oct 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2018

**Responsible Officials**

Holly Hadfield Aguilar Division Chief, Diversity Management Operations, OEOI

Angelia Neal Branch Chief, HR Policy and Performance Management, HCT

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	1. OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.	Yes		09/30/2018
09/30/2018	2. OEOI will monitor separation data of PWD to identify trends.	Yes		09/30/2018
09/30/2018	3. OEOI will monitor exit survey results for separation trends of PWD.	Yes		09/30/2018
09/30/2018	4. OEOI will review tracking of ERIG and disability in career development programs.	Yes		09/30/2018
09/30/2018	5. OEOI will conduct the third bi-annual EEO Climate Survey.	Yes		09/30/2018
09/30/2019	6. OEOI and HCT will continue to partner with DHS and OPM to develop best practices to access and track AFD for internal promotions and career development.	Yes	09/30/2020	
09/30/2019	7. OEOI and HCT will collaborate to conduct a review of merit promotions for indications of barriers.	Yes	09/30/2020	
03/31/2021	8. OEOI and HCT will collaborate to review and analyze results of merit promotions study.	Yes		
09/30/2019	9. OEOI will analyze Climate survey results for retention data on PWD/PWT.	Yes		09/30/2019



09/30/2020	10. OEOI will administer EEO and Diversity Climate Survey with questions focused on PWD/PWTD triggers.	Yes		
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**Fiscal Year 2019 Accomplishments**

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 2018 Accomplishments**

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 place 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

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Trigger 3. PWD that alleged harassment and failure to provide a reasonable accommodation in formal EEO complaints is 23.47% which is higher than the government-wide average of 19.69% and 13.53%, respectively.

**STATEMENT OF BARRIER GROUPS:**

Barrier Group – People with Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

**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.NA

**Objective**

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

**Date Objective Initiated:** Oct 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2019

**Responsible Officials**

Rebecca Arsenault-Herize Division Chief, Complaints Resolution, OEOI

Holly Hadfield Aguilar Division Chief, Diversity Management Operations, OEOI

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	1. OEOI will review and monitor harassment and reasonable accommodation complaints by PWD and identify trends.	Yes	09/30/2020	
03/31/2018	2. OEOI will issue a new EEO policy statement with strong language on anti-harassment.	Yes		12/13/2019
09/30/2019	3. OEOI will review the reasonable accommodations process and identify opportunities for efficiencies.	Yes	09/30/2020	
09/30/2018	4. OEOI will identify and implement ways to educate managers on prevention of harassment, discrimination, and reprisal.	Yes		09/11/2018
09/30/2018	5. OEOI will create and implement an Anti-Bullying initiative.	Yes	09/30/2020	

**Fiscal Year 2019 Accomplishments**

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 2018 Accomplishments**

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 ODP, 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.

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?

Trigger 4. PWD and PWTB 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.

**STATEMENT OF BARRIER GROUPS:**

Barrier Group – People with Disabilities; People with Targeted Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition

**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. NA

**Objective**

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

**Date Objective Initiated:** Oct 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2018

**Responsible Officials**

Angelia Neal Branch Chief, HR Policy and Performance Management, HCT.

Holly Hadfield Aguilar Division Chief, Diversity Management Operations, OEOI

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	1. OEOI and HCT will collaborate with HCT to monitor time off awards, cash awards and QSIs.	Yes	09/30/2020	
09/30/2019	2. OEOI and HCT will collaborate to benchmark other agencies to develop a template for analysis of the awards and recognition system.	Yes	09/30/2020	
09/30/2019	3. OEOI and HCT will collaborate to complete a review and trend analysis of the awards and recognition program.	Yes	09/30/2021	
09/30/2021	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.	Yes		

**FY 2019 Accomplishments**

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.

**FY 2018 Accomplishments**

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 in order 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.

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as 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.

**STATEMENT OF BARRIER GROUPS:**

Barrier Group – People with Disabilities; People with Targeted Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

**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. NA

**Objective**

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

**Date Objective Initiated:** Oct 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2018

**Responsible Officials**

Angelia Neal Chief, HR Policy and Performance Management Branch, HCT

Holly Hadfield Aguilar Chief, Diversity Management Operations, OEOI

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	1. OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.	Yes		09/30/2018
09/30/2018	2. HCT and OEOI will collaborate to review Schedule A processes and identify opportunities for efficiencies.	Yes		09/30/2018
09/30/2018	3. HCT and OEOI will develop a mechanism for tracking Schedule A appointees after conversion eligibility to identify reasons for non-conversion.	Yes	09/30/2020	
09/30/2019	4. OEOI and HCT will collaborate to analyze specific cases of non- conversion to determine reasons and develop a plan to address discrepancies.	Yes	09/30/2020	

**FY 2019 Accomplishments**

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.

**FY 2018 Accomplishments**

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.

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

Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?  
 Trigger 6. There are fewer PWD and PWTDS selected than applied to mentoring programs.

**STATEMENT OF BARRIER GROUPS:**

Barrier Group – People with Disabilities; People with Targeted Disabilities

**BARRIER ANALYSIS:**

Provide a description of the steps taken and data analyzed to determine cause of the condition.

**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. NA

**Objective**

Examine the trigger to determine the reasons for the underrepresentation of PWD and PWTD among applicants and selectees for promotion to the mentoring program.

**Date Objective Initiated:** Oct 1, 2017

**Target Date For Completion Of Objective:** Sep 30, 2019

**Responsible Officials**

Angelia Neal Chief, HR Policy and Performance Management Branch, HCT.

Danyale Corradi Chief, Policy, Planning and Resources, OEOI

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	1. OEOI will coordinate with HCT to benchmark and develop AFD framework for USCIS career development programs.	Yes	09/30/2020	
09/30/2020	2. OEOI will coordinate with HCT to review the mentoring program data collection process.	Yes		

**FY 2019 Accomplishments**

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.

**FY 2018 Accomplishments**

New Trigger.



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

Trigger 1: Planned Activity 3: Due to resources and staffing issues, this initiative completion date has been moved up to FY 2019. Planned Activity 4: PSC and VSC hiring managers were able to identify series and grades for entry level positions but FTEs were not available to be filled. Trigger 2: While the Activities were completed, they are ongoing. The government shutdown and furlough (December 22 to January 25, 2019) made a big impact on completing the planned activities, particularly on the key stakeholders of the Training and Career Development Division (TCDD) and payroll team. Due to multiple priorities, including: processing back pay and preparing for retroactive pay increases, their involvement was more limited than expected. Trigger 3: Planned Activity 1: Monitoring is ongoing. Planned Activity 3: The expected completion date is the end of FY 2019. Planned Activity 4: Anti-harassment training needs to be more comprehensive and ongoing. USCIS needs to continue to find new and efficient ways to train all managers and evaluate the effectiveness of the training. Planned Activity 5: The Anti-bullying initiative is a novel and new initiative with few models within the federal government. More research, benchmarking and partnering with USCIS stakeholders will be needed than originally expected. Trigger 4: The government shutdown and furlough (December 22 to January 25, 2019) impacted key stakeholders of the Training and Career Development Division (TCDD) and payroll teams. Due to multiple priorities, including: processing back pay and preparing for retroactive pay increases, their involvement was more limited than expected. Trigger 5: Planned Activities 1 and 2 need to continue to effectively monitor progress on the trigger. Trigger 6: This is a new trigger, however, unavailability of AFD by disability distribution to effectively analyze percentage of qualified applicants for career development opportunities, promotions, and new hires limits action as well as limited access to AFD using current systems.

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

Trigger 1: Planned Activity 3: Determined the scope of information needed to satisfy requests of support from the field. Planned Activity 4: Identified entry level positions conducive to PWDs/PWTDs and managers were trained in the process to use when FTE slots become available. Planned Activity 5: The CROP will be shared with each program office and hiring managers to assist with the development of FY 2019 hiring plan. Trigger 2: The agency manually tracked applicants and selectees for PWD and PWTD in limited career development programs for the first time enabling initial barrier analysis of these programs. This is ongoing; complete tracking of applicants will be done through Planned Activity #6. Trigger 3: Planned Activity 2: The policy was widely distributed by global email distribution and through USCIS Connect when it was issued. It is also distributed to new employees at onboarding and has increased awareness for the agency commitment to a harassment-free workplace. Trigger 5: Planned Activity 2: The identification of the issues will enable HCT and OEOI to better provide direct support to managers, for example, by providing training to on the use of the Schedule A appointment authority and increasing management awareness on how to manage their excepted service employees. Planned Activity 3: The Schedule A eligibility spreadsheet obtained from DHS allowed USCIS to determine that it has some success in hiring Schedule A candidates given that it has the largest number of Schedule As onboard and eligible for conversion of all DHS components. However, the trigger for conversion still remains. With the new data, USCIS can move to the next stage of analysis to identify specific reasons for eligible Schedule A candidates not being converted within allowable time frames.

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.

Trigger 1: HCT will continue to collaborate with OEOI to analyze the hiring data and work directly with the hiring managers to understand the issues related to the underrepresentation of PWDs/PWTDs in the major occupations and develop an effective action plan. Trigger 2: Next steps will involve further analyses of promotions and career development programs in working groups with DHS, OPM, and EEOC. Trigger 3: Planned Activity 2: USCIS is drafting a new anti-harassment policy. Planned Activity 4 and 5: USCIS will continue researching, benchmarking and partnering with USCIS stakeholders to further develop the Anti-harassment training and Anti-bullying initiative. Trigger 4: See planned activity 2. OEOI and HCT are scheduled to initiate the first review and trend analysis of the time off awards, cash awards and QSIs in FY 2019. Results of the review of the awards system will enable the agency to identify next steps. Trigger 5: All Planned Activities: In FY 2019, HCT will continue to work with OEOI and DHS to implement a tracking procedure customized to USCIS, continue to monitor the use of the Schedule A appointment authority, and further investigate specific reasons for lack of conversion.