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 2020, the agency communicated the 2% onboard goal for PWTD in: • Meetings and communications with collateral duty special emphasis program managers and their managers. • Thirty-one (31) demographic snapshots including diversity workforce data provided to senior leaders. • Monthly meetings between the OEOI Chief and the Deputy Director for Operations. • Meetings between the OEOI Chief and senior leaders from USCIS directorates and program offices. • The Annual State of EEO Briefing to the Deputy Director for Policy and senior leaders on 9/29/2020. • Ad hoc training sessions by HCT and OEOI on non-competitive hiring authorities for hiring managers. • Meetings with corporate recruiters about PWD and PWTD recruiting.

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.

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff by Employment Status Full Time</th>
<th># of FTE Staff by Employment Status Part Time</th>
<th># of FTE Staff by Employment Status Collateral Duty</th>
<th>Responsible Official (Name, Title, Office, Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>1</td>
<td>0</td>
<td>102</td>
<td>Sandra S. Curry Acting Division Chief, Diversity Management Operations, OEOI</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>17</td>
<td>0</td>
<td>0</td>
<td><a href="mailto:Gina.V.Barrett@uscis.dhs.gov">Gina.V.Barrett@uscis.dhs.gov</a></td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>Ken Moser Branch Chief and Section 508 Coordinator</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>5</td>
<td>0</td>
<td>49</td>
<td>Sandra S. Curry Acting Division Chief, Diversity Management Operations, OEOI</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>80</td>
<td>9</td>
<td>0</td>
<td><a href="mailto:Eric.J.Williams@uscis.dhs.gov">Eric.J.Williams@uscis.dhs.gov</a></td>
</tr>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>80</td>
<td>9</td>
<td>0</td>
<td><a href="mailto:Eric.J.Williams@uscis.dhs.gov">Eric.J.Williams@uscis.dhs.gov</a></td>
</tr>
</tbody>
</table>

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 No

In FY 2020, due to COVID-19 and financial constraints, training was limited. USCIS is evaluating training options for FY 2021 as the circumstances with COVID and the budget allow.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer Yes
Section III: Program Deficiencies in The Disability Program

Brief Description of Program Deficiency
C.2.b. Has the agency established disability reasonable accommodation procedures that comply with EEOC’s regulations and guidance? [see 29 CFR §1614.203(d)(3)].

Objective
The agency has revised disability reasonable accommodation procedures to comply with EEOC’s regulations and guidance.

Target Date
Sep 30, 2021

Completion Date
NA

Planned Activities #1
OEOI will draft revised Reasonable Accommodation procedures.
Target Date: Mar. 31, 2021

Planned Activities #2
OEOI will finalize revised Reasonable Accommodation procedures.
Target Date: Sep. 30, 2021

Accomplishments
Year: 2020
This is a new deficiency.

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 utilizes a variety of outreach and recruitment strategies to increase the number of qualified applicants with disabilities and targeted disabilities. In FY 2020, USCIS had limited outreach due to COVID-19, the potential furlough, and the hiring freeze. The agency: • Continued marketing 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. • Despite a hiring freeze from the end of Q2 through Q4, participated in 33 career fairs and outreaches (in-person and virtual) events and webinars targeting active duty or transitioning military and persons with disabilities and targeted disabilities. • Continued to refer disabled veterans’ 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 Vocational Rehabilitation and Employment Program the opportunity to obtain concurrent training and practical job experience. 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 were adapted for use by other DHS components and other federal agencies. • Developed fact sheets for major occupations to increase the number of qualified applicants with disabilities and targeted disabilities. FY 2021 Plans OEOI is collaborating with HCT corporate recruiting and HROC to develop a Schedule A non-competitive hiring process training and are working with program offices and directorates to deliver individualized non-competitive hiring process and hiring practice SOPs and procedures to put in place once the hiring freeze is lifted. USCIS will continue to expand its relationships with various organizations, including disabled veteran organizations and colleges and universities. USCIS will also continue to
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 2020, there was a 38% decrease in new hires due to COVID-19, a potential furlough, and a hiring freeze because of budget constraints. However, USCIS hired 1,265 new employees, of which 195 (15.42%) were veterans with disabilities. This is above the DHS 10% new hire goal for veterans with disabilities. There were 59 individuals hired using Schedule A (4.66% of new hires). USCIS has one of the largest Schedule A workforces at DHS. The agency continued to use 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 via a Veterans Administration (VA), Department of Labor (DoL), and Department of Defense (DoD) sponsored programs, 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. • 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. USCIS Selective Placement Program Coordinator continues to regularly engage in recruitment and outreach activities with job seekers with disabilities to provide assistance on the agency’s policy and procedures.

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.

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. • HCT and OEOI collaborated to provide a Leadership Lessons Series (LLS) module on
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 2020, USCIS continued to partner with multiple disability organizations and educational institutions and formed new partnerships such as the Virginia Department of Blind and Vision Impaired, Council of State Administrators of Vocational Rehabilitation (CSAVR), North Carolina Central University, and Bowie State University. 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 onboard Operation Warfighter volunteers. • Promoted the Workforce Recruitment Program (WRP) Recruiter Program with (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 and VEMP worked on draft guidance that promotes the uses of several internship programs targeting veterans, especially disabled veterans including the on-going DoD Operation Warfighter (OWF), VA Non-Paid Work Experience (NPWE) internship and the newly added programs including DoD SkillBridge program. These programs help to provide participants with an opportunity to augment their employment readiness by building their resumés, exploring employment interests, developing job skills, and gaining valuable Federal government work experience that prepares them for the civilian workplace.

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

   A review of Table B6-1 reveals the following trigger: • 0343 – PWTD New Hires where the qualified applicant pool is 3.00% (3/69 total qualified) but there were no selections. This is a new trigger.

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 for PWTD: • 0301 – 4.29% Qualified Applicants (106/2,473 total qualified) and 1.83% promotion selectees (7/382 total selections). • 1802 – 5.10% Qualified Applicants (25/490 total qualified) and 2.99% promotion selectees (14/469 total selections). • 0930 – 3.89% Qualified Applicants (63/1,621 total qualified) and 1.07% promotion selectees (3/280 total selections). This is a new trigger. • 2210 – 6.25% Qualified Applicants (7/112 total qualified) and 5.17% promotion selectees (3/10 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 2020, 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. Between these two separate programs, 422 mentors and protégés were selected [exclusive of program participants that could not be identified in NFC or were reported multiple times]. Of the total number of selectees, 61 (14.45%) participants were PWDs and 13 (3.08%) participants were PWTDs [exclusive of 30% Vets and Schedule A employees who otherwise did not self-identify]; and • HCT continued to demonstrate agency commitment and dedication to our employees’ growth via 25 webinars and training events. For instance: “Developing a Plan to Further Your Career,” “Learn About the Aspiring Leaders Program,” “Learn About the USCIS Coaching Program,” etc. These webinars and trainings helped to build new skills and cultivate employees’ professional development. • USCIS employees participated in the DHS Disability Mentoring Program Pilot. In FY 2021, 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) Programs (GS 4-SES) • Coaching Program. • Mentoring program for (supervisors and non-supervisors (GS 5-15)). • Peer Networking program. • USCIS Aspiring Leaders Program (GS 4-11). • Homeland Security Investigations-Forensic Lab Training Program. • Pathways programs that include Internship, Recent Graduate, and Presidential Management Fellows. Of the programs identified, only the LEAD program involves a panel-based selection process. All programs require supervisor approval.

2. In the table below, please provide the data for career development opportunities that require competition and/or
supervisory recommendation/ approval to participate.


<table>
<thead>
<tr>
<th>Career Development</th>
<th>Total Participants Applicants (#)</th>
<th>Total Participants Selectees (#)</th>
<th>PWD Applicants(%)</th>
<th>PWD Selectees (%)</th>
<th>PWTD Applicants (%)</th>
<th>PWTD Selectees (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coaching Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fellowship Programs</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<td>0</td>
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<tr>
<td>Detail Programs</td>
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<td>0</td>
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<td>0</td>
</tr>
<tr>
<td>Internship Programs</td>
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<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Mentoring Programs</td>
<td>429</td>
<td>422</td>
<td>Multi</td>
<td>Multi</td>
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<td>Multi</td>
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<tr>
<td>Training Programs</td>
<td>842</td>
<td>535</td>
<td>Multi</td>
<td>Multi</td>
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<td>Multi</td>
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<tr>
<td>Other Career Development Programs</td>
<td>416</td>
<td>43</td>
<td>Multi</td>
<td>Multi</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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 Yes
   b. Selections (PWD) Answer Yes

NOTE: HCT does not collect demographic data and detailed applicant flow data (AFD) for the career development programs identified above. USCIS will continue to work with HCT, DHS, and/or OPM to acquire access to applicant flow data as identified in the planned activities. Also, data excludes program participants that could not be identified in NFC or were reported multiple times. The benchmark is identified as (BM). A difference was noted in the participation rate among applicants to most career programs as compared with the relevant applicant pools of PWD in the permanent workforce. Where a program was not limited to a specific grade level, the relevant benchmark used was the overall onboard percentage of PWD (22.70%). Most LEAD programs fell below the benchmark for PWD applicants and selectees excluding the Leadership for a Democratic Society and the Executive Potential programs. The selection rate for PWDs in the mentoring and Peer Networking program was also below the benchmark of the applicant pool. For detailed breakouts including benchmarks by program area refer to full report.

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 Yes
   b. Selections (PWTD) Answer Yes

See the note in #3 above. A difference was noted in the participation rate among applicants to all career development programs (except mentoring programs) as compared to relevant applicant pools of PWTD in the permanent workforce. Where a program was not limited to specific grade levels, the relevant benchmark used was the overall onboard percentage of PWTDs (2.77%). There were no PWTDs who applied to or were selected for the mentoring (New Supervisors) and LEAD programs. For detailed breakouts including benchmarks by program area refer to full report.

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
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 $1,000 - $5,000 or more. There is a new trigger for PWDs and PWTDs who receive cash awards of $4,000 - $4,999. 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 triggers involving the percentage of PWD and PWTD who received a quality step increase and performance-based pay increases. The trigger for pay increases is new.

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If “yes”, describe the employee recognition program and relevant data in the text box.
   a. Other Types of Recognition (PWD) Answer No
   b. Other Types of Recognition (PWTD) Answer No

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

D. PROMOTIONS

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

The following triggers were found for PWTD based on Table B7-1: • There were no internal selectees for promotion at grade GS-15 where the qualified applicant pool was 1.89% (19/1,003). This is a new trigger category since FY 2019. • GS-14 selection rate was 2.37% (4/169) which was below the benchmark of 2.67% (52/1,944). • GS-13 selection rate was 2.60% (10/385) which was below the benchmark of 4.07% (62/1,522). Qualified applicant pool data is available but 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 No
c. New Hires to GS-14 (PWTD) Answer No
d. New Hires to GS-13 (PWTD) Answer No

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 No
   b. Managers
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD) Answer No
   c. Supervisors
      i. Qualified Internal Applicants (PWD) Answer N/A
      ii. Internal Selections (PWD) Answer No

Note: Executives are identified based on their hiring authority (e.g., SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. Relevant applicant pool data is not available to properly validate qualified internal applicants.

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

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

After a review of Table B8-1 there are several triggers for PWTD: • There were no Executives selected and the benchmark was 1.93% (19/986). • The Managers selection rate was 2.15% (2/93) which was below the benchmark of 3.03% (47/1,549). • The
Supervisors selection rate was 2.78% (86/3095) which was below the benchmark of 4.35% (16/368). Relevant applicant pool data is not available to properly validate qualified internal applicants.

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  No
   b. New Hires for Managers (PWD)  Answer  No
   c. New Hires for Supervisors (PWD)  Answer  No

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among these 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  No
   b. New Hires for Managers (PWTD)  Answer  Yes
   c. New Hires for Supervisors (PWTD)  Answer  No

   After a review of Table B8-1 there is one trigger for PWTD: • The Managers selection rate was 2.44% (1/41) which was below the benchmark of 2.50% (2/80).

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

   Answer  No

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

HCT tracks individuals who are on an excepted service appointment including those on a Schedule A appointment and provides reports to offices advising when a person is eligible for conversion to a competitive service appointment. Managers are responsible for conversion or any further action. In previous years, USCIS does not track reasons for non-conversion. OEOI and HCT reviewed the 58 FY 2019 Schedule A eligible non-conversions to analyze reasons for non-conversion and found: • 39 (67.24%) were ultimately converted, • 2 (3.45%) were hired/promoted, • 4 (6.90%) separated, • 8 (13.79%) had processing errors or were in the process of verification, and • 5 (8.62%) were unresolved. In FY 2020, USCIS converted 42 Schedule A employees out of 75 (56%) who were eligible. Of those converted: • 37 (88.10%) were converted non-competitively after two years of satisfactory service, • 5 (11.91%) were converted to career or career conditional before two years of service, and • 31 (41.33%) were eligible but not converted. • There were 13 separations of which 5 (38.46%) were Schedule A separations before conversion. This was a 46.55% decrease in eligible non-
 conversions from FY 2019. OEOI and HCT will review and analyze FY 2020 non-conversions, continue to closely monitor the progress of Schedule A, separations, and conversions, and is implementing an action plan to resolve the discrepancies.

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

   a. Voluntary Separations (PWTD) Answer Yes
   b. Involuntary Separations (PWTD) Answer Yes

Table B-1 was reviewed and there are triggers for the rate at which PWTD: • Voluntarily separated from the agency (7.50% or 40/533) as compared to the rate at which PWOTD did (3.46% or 647/18,677). • Involuntarily separated from the agency (3.75% or 20/533) as compared to the rate at which PWOTD did (2.52% or 470/18,677). The rates are comparable to triggers reported in FY 2019.

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 2020 USCIS exit survey data are insufficient to determine why PWD/PWTD separated.

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.

Four facilities (New Orleans Asylum and the Greer, Montgomery, and Oakland Park Field Offices) have had automatic door openers installed since September 2019. Sixty (60) facilities remain. USCIS plans to install automatic door openers at the remaining locations between fiscal years 2021 - 2023, as long as sufficient funding is available.

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
This information is not available for FY 2020 because the DHS-operated system used for tracking was updated and, as a result, reporting capabilities have been negatively impacted. USCIS continues to research 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 2020, USCIS received 1,228 requests and processed 1,043 requests for accommodations. The program trained 353 supervisors on reasonable accommodation processes through a partnership between OEOI and the Training and Career Development Division (TCDD) of HCT as part of the USCIS LLS. As noted earlier, USCIS is researching more accurate systems to better track accommodation requests and improve its ability to identify trends. The agency will revise Reasonable Accommodations procedures to comply with EEOC requirements in FY2021. See Part H 5.

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

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

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

USCIS personal assistance service requests are handled through the agency’s reasonable accommodation procedures. The management directive on Disability Accommodations for Employees and Job Applicants and EEOC guidance on PAS and on the new rule implementing Section 501 were posted to the USCIS external and internal websites (https://www.uscis.gov/about-us/ affirmative-action-plan-recruitment-hiring-advancement-and-retention-persons-disabilities). 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 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 FY 2020: In response to question one, PWDs alleged harassment in 43 out of 139 formal complaints (30.93%) which is higher than the government-wide average of 20.82% and the FY 2019 rate of 23.47% (27/115). • In response to question two, there were 5 settlement agreements and 2 findings of discrimination. • The corrective measures taken by the agency included: training and disciplinary action against responsible officials.
B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

   Answer Yes

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

   Answer Yes

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

   In FY 2020: In response to question one, PWDs alleged failure to provide reasonable accommodation in 35 out of 139 formal complaints (25.18%) which is higher than the government-wide average of 14.02% and the FY 2019 rate of 23.47% (27/115). • In response to question two, there were 11 settlement agreements and 2 findings of discrimination. • Corrective measures taken include training and consideration of disciplinary action.

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
Source of the Trigger: Workforce Data (if so identify the table)
Specific Workforce DataTable: Workforce Data Table - B6

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 targeted disabilities among new hires and qualified internal applicants and selectees for promotions to certain senior grade levels and supervisory positions.

STATEMENT OF BARRIER GROUPS:
Barrier Group - People with Targeted Disabilities
Barrier Analysis Process Completed?: N
Barrier(s) Identified?: N

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

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

OBJECTIVE(S) AND DATES FOR EEO PLAN
Date Initiated 10/01/2017
Target Date 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified 09/30/2021
Date Completed
Objective Description Examine the reason for the trigger.

RESPONSIBLE OFFICIAL(S)
Title/Name/Standards Address The Plan?
Chief, HR Policy and Performance Management, HCT/Angelia Neal/No
Division Chief, Policy, Planning and Resources, OEOI/Danyale Corradi/No
Acting Division Chief, Diversity Management Operations, OEOI/Sandra Curry/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE
### REPORT OF ACCOMPLISHMENTS

#### Fiscal Year 2020 Accomplishments

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

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

#### Fiscal Year 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.

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<table>
<thead>
<tr>
<th>Target Date</th>
<th>Planned Activities</th>
<th>Sufficient Staffing &amp; Funding?</th>
<th>Modified Date</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/30/2018</td>
<td>1. OEOI and HCT will partner to identify and implement strategies to increase recruitment of PWTD.</td>
<td>Yes</td>
<td>09/30/2018</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>2. OEOI will monitor applicant data of PWTD in major occupations to identify trends.</td>
<td>Yes</td>
<td>09/30/2018</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>3. OEOI will develop a Quick Reference Guide for Disability hiring for managers. (Now activity 1-1)</td>
<td>Yes</td>
<td>09/30/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>4. OEOI will develop and conduct a pilot program to identify entry level and promotional opportunities for PWDs. (Now activity 2-1).</td>
<td>Yes</td>
<td>09/30/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>5. OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach Plan (CROP).</td>
<td>Yes</td>
<td>09/30/2018</td>
<td></td>
</tr>
<tr>
<td>09/30/2019</td>
<td>7. OEOI and HCT will collaborate to develop a plan to review policies, practices and procedures related to promotion. (Now activity 5-1).</td>
<td>Yes</td>
<td>09/30/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2020</td>
<td>8. OEOI and HCT will review and analyze results of the Merit Promotion study. (Now activity 6-1 and 3-2).</td>
<td>Yes</td>
<td>03/31/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2020</td>
<td>9. OEOI and HCT will work with DHS CRCL to access AFD by disability to effectively analyze percent of qualified candidates for promotions as required by MD-715. (Now activity 7-1).</td>
<td>Yes</td>
<td>09/30/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2021</td>
<td>10. OEOI will develop a disability demographic snapshot and distribute to HCT and senior leadership. (Now activity 8-1).</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>09/30/2019</td>
<td>6. OEOI and HCT will collaborate to monitor and review promotions and identify trends. (Now activity 3-1).</td>
<td>Yes</td>
<td>09/30/2020</td>
<td>09/30/2020</td>
</tr>
</tbody>
</table>
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 FY2020.

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.
Source of the Trigger: Workforce Data (if so identify the table)
Specific Workforce DataTable: Workforce Data Table - B1

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 BARRIER GROUPS:
Barrier Group – People with Disabilities; People with Targeted Disabilities
Barrier Analysis Process Completed?: N
Barrier(s) Identified?: N

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

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

OBJECTIVE(S) AND DATES FOR EEO PLAN
Date Initiated 10/01/2017
Target Date 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified 09/30/2023
Date Completed
Objective Description
Examine the trigger to determine the reasons why PWD and PWTD are separating from the agency at higher rates than persons without disabilities /targeted disabilities.

RESPONSIBLE OFFICIAL(S)
Title/Name/Standards Address The Plan?
Acting Division Chief, Diversity Management Operations, OEOI/Sandy Curry/No
Branch Chief, HR Policy and Performance Management, HCT/Angelia Neal/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE
<table>
<thead>
<tr>
<th>Target Date</th>
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<th>Sufficient Staffing &amp; Funding?</th>
<th>Modified Date</th>
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</tr>
</thead>
<tbody>
<tr>
<td>09/30/2018</td>
<td>1. OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.</td>
<td>Yes</td>
<td></td>
<td>09/30/2018</td>
</tr>
<tr>
<td>09/30/2018</td>
<td>2. OEOI will monitor separation data of PWD to identify trends.</td>
<td>Yes</td>
<td></td>
<td>09/30/2018</td>
</tr>
<tr>
<td>09/30/2018</td>
<td>3. OEOI will monitor exit survey results for separation trends of PWD.</td>
<td>Yes</td>
<td></td>
<td>09/30/2018</td>
</tr>
<tr>
<td>09/30/2018</td>
<td>4. OEOI will review tracking of ERIG and disability in-career development programs.</td>
<td>Yes</td>
<td></td>
<td>09/30/2018</td>
</tr>
<tr>
<td>09/30/2018</td>
<td>5. OEOI will conduct the third bi-annual EEO Climate Survey.</td>
<td>Yes</td>
<td></td>
<td>09/30/2018</td>
</tr>
<tr>
<td>09/30/2019</td>
<td>6. OEOI and HCT will continue to partner with DHS and OPM to develop best practices to access and track AFD for internal promotions. (Now activity 1-2)</td>
<td>Yes</td>
<td>09/30/2021</td>
<td></td>
</tr>
<tr>
<td>09/30/2019</td>
<td>7. OEOI and HCT will collaborate to conduct a review of merit promotions for indications of barriers. (Now activity 2-2).</td>
<td>Yes</td>
<td>09/30/2021</td>
<td></td>
</tr>
<tr>
<td>03/31/2021</td>
<td>8. OEOI and HCT will collaborate to review and analyze results of merit promotions study. (Now activities 6-1 and 3-2).</td>
<td>Yes</td>
<td>03/31/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2019</td>
<td>9. OEOI will analyze Climate survey results for retention data on PWD/PWTD.</td>
<td>Yes</td>
<td></td>
<td>09/30/2019</td>
</tr>
<tr>
<td>09/30/2020</td>
<td>10. OEOI will administer EEO and Diversity Climate Survey with questions focused on PWD/PWTD triggers. (Now activity 4-2).</td>
<td>Yes</td>
<td>09/30/2021</td>
<td></td>
</tr>
</tbody>
</table>

**REPORT OF ACCOMPLISHMENTS**

**Fiscal Year 2020 Accomplishments**

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

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

**Fiscal Year 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 valued 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.
Source of the Trigger: EEO Complaint(s)
Specific Workforce DataTable: Workforce Data Table - B1

STATEMENT OF CONDITION THAT WASA 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 informal EEO complaints is higher than the government-wide average.

STATEMENT OF BARRIER GROUPS:

Barrier Group - People with Disabilities
Barrier Analysis Process Completed?: N
Barrier(s) Identified?: N

STATEMENT OF IDENTIFIED BARRIER:

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

Barrier Name: Barriers have not been identified
Description of Policy, Procedure, or Practice: NA

OBJECTIVE(S) AND DATES FOR EEO PLAN

Date Initiated 10/01/2017
Target Date 09/30/2019
Sufficient Funding /Staffing? Yes
Date Modified 09/30/2020
Date Completed

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

RESPONSIBLE OFFICIAL(S)

Title/Name/Standards Address The Plan?
Division Chief, Complaints Resolution, OEOI/Rebecca Arsenault-Herize/No
Acting Division Chief, Diversity Management Operations, OEOI/Sandra Curry/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE
REPORT OF ACCOMPLISHMENTS

Fiscal Year 2020 Accomplishments

Modifications: Activities were revised and renumbered to consolidate them.

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

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

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

Planned Activity 4:
This is an ongoing initiative. USCIS conducted two new Anti-harassment webinar lunch and learn sessions for employee and managers. The Anti-harassment lunch and learns reached over 200 USCIS employees and managers. USCIS was 99% compliant with the new DHS Anti-harassment training requirement in FY2018.

Planned Activity 5:
This is an ongoing initiative. Some research and benchmarking was done to baseline the initiative.
Source of the Trigger: Workforce Data
Specific Workforce DataTable: Workforce Data Table – B9

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

STATEMENT OF BARRIER GROUPS:

<table>
<thead>
<tr>
<th>Barrier Group</th>
<th>People with Disabilities and People with Targeted Disabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barrier Analysis Process Completed?</td>
<td>N</td>
</tr>
<tr>
<td>Barrier(s) Identified?</td>
<td>N</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Barrier Name</th>
<th>Barriers have not been identified</th>
</tr>
</thead>
<tbody>
<tr>
<td>Description of Policy, Procedure, or Practice</td>
<td>NA</td>
</tr>
</tbody>
</table>

OBJECTIVE(S) AND DATES FOR EEO PLAN

<table>
<thead>
<tr>
<th>Date Initiated</th>
<th>10/01/2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Target Date</td>
<td>09/30/2018</td>
</tr>
<tr>
<td>Sufficient Funding /Staffing?</td>
<td>Yes</td>
</tr>
<tr>
<td>Date Modified</td>
<td>09/30/2025</td>
</tr>
<tr>
<td>Date Completed</td>
<td></td>
</tr>
<tr>
<td>Objective Description</td>
<td>Identify policy, practice or procedures that may be impacting award distribution for PWD and PWTDs.</td>
</tr>
</tbody>
</table>

RESPONSIBLE OFFICIAL(S)

<table>
<thead>
<tr>
<th>Title/Name/Standards Address The Plan?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Branch Chief, HR Policy and Performance Management, HCT /Angelia Neal/No</td>
</tr>
<tr>
<td>Acting Division Chief, Diversity Management Operations, OEOI/Sandra Curry/No</td>
</tr>
</tbody>
</table>

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE
DHS - Citizenship and Immigration Services

REPORT OF ACCOMPLISHMENTS

Fiscal Year 2020 Accomplishments

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

Activities: OEOI met with HCT corporate recruiters to incorporate Schedule A into the hiring process. OEOI and HCT have set timetables for review of all major employment areas starting with merit promotions. 2-4 discussed adding questions to EEO Program Questionnaire for analysis. Also see Parts H7-H9 (measures C.4.a, C.4.c, E.4.a.2 and E.4.a.4).

Fiscal Year 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.

Fiscal Year 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.

Page 25
Source of the Trigger: Other
Specific Workforce DataTable: Workforce Data Table – B1

STATEMENT OF CONDITION THAT WASA 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 and People with Targeted Disabilities
Barrier Analysis Process Completed?: N
Barrier(s) Identified?: N

STATEMENT OF IDENTIFIED BARRIER:
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.
Barrier Name: Barriers have not been identified
Description of Policy, Procedure, or Practice: NA

OBJECTIVE(S) AND DATES FOR EEO PLAN
Date Initiated 10/01/2017
Target Date 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified 09/30/2022
Date Completed
Objective Description Examine the reason for the trigger and increase conversion rates of eligible Schedule A employees into competitive service.

RESPONSIBLE OFFICIAL(S)
Title/Name/Standards Address The Plan?
Branch Chief, HR Policy and Performance Management, HCT / Angelia Neal / No
Acting Division Chief, Diversity Management Operations, OEOI / Sandra Curry / No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE
<table>
<thead>
<tr>
<th>Target Date</th>
<th>Planned Activities</th>
<th>Sufficient Staffing &amp; Funding?</th>
<th>Modified Date</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/30/2018</td>
<td>1. OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.</td>
<td>Yes</td>
<td>09/30/2018</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>2. HCT and OEOI will collaborate to review Schedule A processes and identify opportunities for efficiencies.</td>
<td>Yes</td>
<td>09/30/2018</td>
<td></td>
</tr>
<tr>
<td>09/30/2018</td>
<td>3. HCT and OEOI will review and analyze procedures and develop best practices for Schedule A eligible for conversion who are not converted. (Now activity 1-5).</td>
<td>Yes</td>
<td>09/30/2022</td>
<td></td>
</tr>
<tr>
<td>09/30/2019</td>
<td>4. OEOI and HCT will collaborate to analyze specific cases of non-conversion to determine reasons and develop a plan to address discrepancies. (Former activity 3 and 4; Now activity 2-5)</td>
<td>Yes</td>
<td>09/30/2020</td>
<td>09/30/2020</td>
</tr>
</tbody>
</table>

**REPORT OF ACCOMPLISHMENTS**

**Fiscal Year 2020 Accomplishments**

Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. For example, activities 3 and 4 were combined. Dates were extended to allow reasonable time to accomplish objectives.

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

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

**Fiscal Year 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.

**Fiscal Year 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.
Source of the Trigger: Other
Specific Workforce DataTable: Workforce Data Table – B1

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 specific career development programs.

STATEMENT OF BARRIER GROUPS:
Barrier Group - People with Disabilities and People with Targeted Disabilities
Barrier Analysis Process Completed?: N
Barrier(s) Identified?: N

STATEMENT OF IDENTIFIED BARRIER:
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.
Barrier Name: Barriers have not been identified
Description of Policy, Procedure, or Practice: NA

OBJECTIVE(S) AND DATES FOR EEO PLAN
Date Initiated 10/01/2017
Target Date 09/30/2019
Sufficient Funding /Staffing? Yes
Date Modified 09/30/2024
Date Completed
Objective Description Examine the trigger to determine the reasons for the underrepresentation of PWD and PWTD among applicants and selectees for career development programs.

RESPONSIBLE OFFICIAL(S)
Title/Name/Standards Address The Plan?
Branch Chief, HR Policy and Performance Management, HCT /Angelia Neal/No
Chief, Policy Planning and Resources, OEOI/Danyale Corradi/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

<table>
<thead>
<tr>
<th>Target Date</th>
<th>Planned Activities</th>
<th>Sufficient Staffing &amp; Funding?</th>
<th>Modified Date</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>09/30/2019</td>
<td>1. OEOI will coordinate with HCT to benchmark and develop AFD framework for USCIS career development programs. (Now activity 1-6).</td>
<td>Yes</td>
<td>09/30/2023</td>
<td></td>
</tr>
<tr>
<td>09/30/2020</td>
<td>2. OEOI will coordinate with HCT to review and analyze career development program policies and procedures. (Now activity 2-6).</td>
<td>Yes</td>
<td>09/30/2024</td>
<td></td>
</tr>
</tbody>
</table>

REPORT OF ACCOMPLISHMENTS
Fiscal Year 2020 Accomplishments
Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Description of the trigger was revised. Dates were extended to allow reasonable time to accomplish objectives.

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

Fiscal Year 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.

Fiscal Year 2018 Accomplishments

New trigger.

4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.
   Most planned activities were put on hold due to potential administrative furlough events in Q3 and Q4 FY 2020; funding for multiple contracts were also cancelled.

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

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.
   NA