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 below text.

     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 below text.

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

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

Grade Level Cluster (GS or Alternate Pay plan)	Total #	Reportable Disability 12% - #	Reportable Disability 12% - %	Targeted Disability 2% - #	Targeted Disability 2% - %
Numerical Goal	*	*	*	*	*
Grades GS-1 to GS-10	4752	1386	29.17	178	3.75
Grades GS-11 to SES	13326	3177	23.84	347	2.60

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

During FY 2021, the agency communicated the 2% onboard goal for PWTD: • Through the FY 2020 Annual EEO Program Status Report (MD-715) published agency-wide. • Ad hoc training sessions by HCT and OEOI on noncompetitive hiring authorities for persons with disabilities mentioned our goals of 12% persons with disabilities and 2% persons with targeted disabilities. • During recruitment strategy discussions to include competitive (job announcement) and noncompetitive options (special hiring authorities such as Schedule A for people with disabilities, 30% or more disabled veterans). • During meetings and training sessions the hiring goals were shared with Special Emphasis Program Managers (SEPM). The SEPMs are tasked to support targeted disability outreach and recruitment, as applicable. • During training sessions delivered by OEOI on diverse DEIA topics such as "Leadership Lessons: A Guide to Reasonable Accommodations for Employees" and "Fostering an Inclusive and Respectful Workplace." • OEOI's Disability Employment Program Manager frequently met with hiring managers and discussed the disability hiring goals and benefits of using Schedule A hiring. • OEOI's MD-715 coordinator provided senior management with Demographic Workforce Snapshots that included data related to the hiring goals for PWDs and PWTDs.

Section II: Model Disability Program

Under 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: No

OEOI will assess funding needs and develop and submit a plan to the USCIS Director.

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	0	89	0	shannon.r.sarbo@uscis.dhs
Answering questions from the public about hiring authorities that take disability into account	0	89	0	shannon.r.sarbo@uscis.dhs
Section 508 Compliance	0	1	0	Ken Moser Branch Chief and Section 508 Coordinator
Architectural Barriers Act Compliance	0	17	0	gina.v.barrett@uscis.dhs.gov
Special Emphasis Program for PWD and PWTD	0	1	120	Morenike. Ogebe, D&I Supv.EEO Specialist, OEOI
Processing reasonable accommodation requests from applicants and employees	5	0	49	Sandra M. Sutton DAP Supv.EEO Specialist, 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 2021, all full-time disability accommodations program staff attended a 2-day ADA training by the National Employment Law Institute (NELI). Training on the intersection between Reasonable Accommodation and FMLA was provided to two staff in addition to the ADA training.

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   No

OEOI will assess funding needs and develop and submit a plan to the USCIS Director.

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

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

Planned Activities
Target Date: 03/31/2021
Completion Date: 09/20/2021
Planned Activity: 1. OEOI will draft revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/30/2021
Completion Date: N/A
Planned Activity: 2. OEOI will finalize revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 3. OEOI will research reasonable accommodation systems that are compliant with MD-715 reporting.

Target Date: 09/30/2021
Completion Date: N/A
Planned Activity: 4. OEOI will submit a proposal for funding approval to the OCFO and senior leadership for a new reasonable accommodation tracking system to include funding needs.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 5. Secure contract for new reasonable accommodation tracking system.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 6. Install new reasonable accommodation tracking system.

Accomplishments

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

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

Target Date: 09/30/2021
Completion Date: 09/20/2021

Planned Activities

Target Date: 03/31/2021
Completion Date: N/A
Planned Activity: 1. OEOI will draft revised Reasonable Accommodation procedures.

Target Date: 09/30/2021
Completion Date: N/A
Planned Activity: 2. OEOI will finalize revised Reasonable Accommodation procedures.

Accomplishments

Fiscal Year Accomplishments 2020
This is a new deficiency.

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

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

Target Date: 09/30/2021
Completion Date: 09/20/2021

Planned Activities

Target Date: 03/31/2021
Completion Date: 09/30/2021
Planned Activity: 1. OEOI will draft revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/302021
Completion Date: N/A
Planned Activity: 2. OEOI will finalize revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/30/2022
Completion Date: 10/30/2020
Planned Activity: 3. OEOI will research reasonable accommodation systems that are compliant with MD-715 reporting.

Target Date: 09/30/2021
Completion Date: 09/30/2021
Planned Activity: 4. OEOI will submit a proposal for funding approval to the OCFO and senior leadership for a new reasonable accommodation tracking system to include funding needs.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 5. Secure contract for new reasonable accommodation tracking system.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 6. Install new reasonable accommodation tracking system.

Accomplishments

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

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

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

Planned Activities:

Target Date: N/A
Completion Date: N/A
Planned Activity: N/A

Brief Description of Program Deficiency
C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]

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

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

Planned Activities:

Target Date: 03/31/2021
Completion Date: 09/20/2021
Planned Activity: 1. OEOI will draft revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/30/2021
Completion Date: N/A
Planned Activity: 2. OEOI will finalize revised Reasonable Accommodation and Personal Assistance Services procedures.

Target Date: 09/30/2022
Completion Date: 10/30/2020
Planned Activity: 3. OEOI will research reasonable accommodation systems that are compliant with MD-715 reporting.

Target Date: 09/30/2021
Completion Date: 09/30/2021
Planned Activity: 4. OEOI will submit a proposal for funding approval to the OCFO and senior leadership for a new reasonable accommodation tracking system to include funding needs.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 5. Secure contract for new reasonable accommodation tracking system.

Target Date: 09/30/2023
Completion Date: N/A
Planned Activity: 6. Install new reasonable accommodation tracking system.

Accomplishments:

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

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

Target Date: 09/30/2021
Completion Date: 09/20/2021

Planned Activities:

Target Date: 03/31/2021
Completion Date: 09/20/2021
Planned Activity: 1. OEOI will draft revised Reasonable Accommodation and Personal Assistance Services procedures.

Accomplishments

Fiscal Year Accomplishments

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 2021, USCIS:
• Advised hiring managers about several paid and non-paid internship programs that are available for use including VA Non-Paid Work Experience Program, Workforce Recruitment Program (WRP), Operation Warfighter Program (OWFP). • Leveraged collateral-duty special emphasis program managers to conduct outreach and recruitment efforts with disability organizations and educational institutions.
• Continued to develop, update, and widely distribute recruitment materials at each recruitment outreach event to promote the use of special hiring authorities for persons with disabilities
• Encouraged hiring managers to use the Schedule A Hiring Authority prior to advertising positions and continued to refer disabled veterans' resumes to hiring managers to support veteran hiring goals.
• Promoted and encouraged employees and SEPMs to serve as recruiters for the Workforce Recruitment Program for College Students with Disabilities Participated at the Job Club Meetings sponsored by the Virginia Department for the Blind and Vision Impaired and Department of Aging and Rehabilitative Services' Job Club meetings during FY 2021. Representatives presented a USCIS overview, Schedule A hiring authority, steps in applying for positions via USAJOBS, interviewing techniques and writing a federal resume, evaluated elevator speeches, and ended with a Q&A session.
• Participated in Gallaudet University's mock interview sessions. At the end of the interviews, students were provided with feedback and tips to improve their interviewing skills. Approximately 12 students participated in the virtual sessions.
• Developed fact sheets for major occupations to increase the number of qualified applicants with disabilities and targeted disabilities.
• Revised the SEPM Briefing and training to include the importance and benefits of developing disability partnerships within their respective locations.
• Continued to develop, update, and widely distribute recruitment materials at each recruitment outreach event to promote the use of special hiring authorities for persons with disabilities.

FY 2022 Plans:
• Create recruitment materials in alternative formats (braille, electronic, large print, etc.). Expanding network to organizations that are led by and work with people with disabilities.
• Provide a Toolkit for Hiring Persons with Disabilities that includes information on special hiring authorities for Schedule A and 30% or more veterans, hiring goals, Workforce Recruitment Program, Operation Warfighter Program, and other disability resources.
Continue to update the hiring system to ensure that people with disabilities have fair and equal opportunities to demonstrate their qualifications. For example: providing extra time to complete hiring assessments based on reasonable accommodation request.
• Develop resources to promote the use of non-paid work experience programs for service members and veterans, many of whom may have a disability – DoD Operation Warfighter, DoD Skill bridge, and VA Non-Paid Work Experience Program.
• Develop a guidance document on various veterans' Non-Paid Work Experience Programs and promote the use of these programs.
• Update the OEOI's Disability Employment Program page to include the disability partnerships, the WRP, VA Non-Paid Work Experience Program, Operation Warfighter Program.

• Create a disability article that highlights the disability partnerships, disability hiring goals, and other disability related information.
• Continue to provide hiring managers, resource managers and others involved in the hiring/recruiting process the link to the Workforce Recruitment Program and instructions on how register as an employer.
• Continue to promote the WRP with hiring managers when conducting trainings and meetings.
• Continue to refer to the special hiring authorities as part of the briefing when meeting with hiring managers and supervisors.

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 uses all available hiring authorities to recruit and hire PWD and PWTD, including Schedule A and the 30% or more disabled veteran's appointment authority. Although the percentage of new hires remained low due to a hiring freeze, USCIS continued exceeding the 10% DHS goal for hiring veterans. As of the end of the Fiscal Year, veterans occupied 26.5% of the workforce of which 18.3.% were disabled veterans. There were 4 individuals hired using Schedule A out of 212 new hires (1.89%) during the FY.
• 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.

Applicants eligible under special hiring authorities can:

• Use their status under a special hiring authority to apply to various job opportunity announcements on USAJOBS. Eligibility is determined by HR Specialists prior to referral to the hiring office, by reviewing documentation submitted to support the eligibility (Schedule A letter, VA letter, etc.).

• Submit applications to hiring offices, outside of a job announcement. If offices are interested in considering the individual, eligibility is determined by an HR Specialist after the office has seen the application. Eligibility is determined by HR Specialists using the submitted documentation (Schedule A letter, VA letter, etc.). Applicants using special hiring authorities are referred when:

• Applications accepted through job announcements are referred on a certificate of eligibles through the applicant tracking system. Selections are made through these certificates and selectees are entered into the onboarding process in the applicant tracking system. Disability identification is obtained prior to entrance on duty (EOD), which is the first point in the process where the agency will collect information on the type of disability (including if it is a targeted disability).

• Applications submitted outside of USAJOBS may be sent directly to the hiring office by the applicant, or based on

connections made with an HR representative, candidate, and hiring office. Selections are made through direct communication between the hiring office and their HR Specialist. Selectees are entered into the onboarding process in the applicant tracking system as non-competitive selections. Disability identification is obtained prior to entrance on duty (EOD), which is the first point in the process where we will collect information on the type of disability (including if it is a targeted disability).

4. Has the agency provided training to all hiring managers on the use of hiring authorities that take disability into account (e.g., Schedule A)? If "yes", describe the type(s) of training and frequency. If "no", describe the agency's plan to provide this training.

                                                                Answer   Yes

USCIS employs diverse methods to train and inform its supervisors and managers about the use of hiring authorities that take disability into account, including:
• Mandatory annual online training titled "Employment of People with Disabilities: A Roadmap to Success" for supervisors, managers, and HR professionals.
• Offering the following optional training geared toward supervisors, hiring managers, and/or resource management employees, which include information about special hiring authorities, including recruiting/hiring individuals with disabilities: Strategic Recruiting – Utilizing the Schedule A Hiring Authority, Fundamentals of Mission Support Training – Recruitment and Placement Module.
The following additional ad hoc training is provided:
• 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 collaborate to provide a Leadership Lessons Series (LLS) module on Recruiting, Hiring and Retaining Persons with Disabilities, Managing Diversity and Inclusion, and Leveraging Diversity and Inclusion.
• HR Specialists monthly provide supervisors with lists of all excepted service employees, including Schedule A hires, who are eligible to convert to a competitive, permanent position.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

As highlighted in Section III.A.4., in FY 2021, USCIS continued to partner with multiple disability organizations and educational institutions with which connections were already established: Virginia Department for the Blind and Vision Impaired (VA DBVI), Texas Veterans Commission, Virginia Department for Aging and Rehabilitative Services (VA DARS), Gallaudet University, and State of Vermont Department of Labor. USCIS also built and maintained relationships with: Nebraska Vocational Rehab – Dept of Education, VA Veteran Readiness & Employment (VR&E) Employment Coordinators, DoD Operation Warfighter (OWF) Regional Coordinators, State Departments of Labor, and Disability/access offices for targeted colleges and universities.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

        a. New Hires for Permanent Workforce (PWD)   Answer   No

        b. New Hires for Permanent Workforce (PWTD)   Answer   No

New Hires	Total (#)	Reportable Disability Permanent Workforce (%)	Reportable Disability Temporary Workforce (%)	Targeted Disability Permanent Workforce (%)	Targeted Disability Temporary Workforce (%)
% of Total Applicants	3015	13.03	0.00	5.07	0.00
% of Qualified Applicants	2160	12.08	0.00	4.49	0.00
% of New Hires	149	35.57	0.00	6.04	0.00

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 below text.

       a. New Hires for MCO (PWD)   Answer   Yes

       b. New Hires for MCO (PWTD)   Answer   Yes

A review of *Table B6*-1 New hires by MCO was conducted. The applicant flow data was derived from Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections: 0343 A trigger was identified when comparing the qualified applicant pool for PWD (47.37%) and PWTDs (21.05%) to their selection rates 23.81%* and 0%, respectively. 930 A trigger was identified when comparing the qualified applicant pool for PWD (33.33%) to the selection rate of 27.27%. *This is a new trigger. 0301 A trigger was identified when comparing the qualified applicant pool for PWTDs (8.74%) to the selection rate of 5.26%. This is a new trigger. 2210 A trigger was identified when comparing the qualified applicant pool for PWTDs (9.49%) to the selection rate of 0%. This is a new trigger. *NOTE:* Some selections are higher than qualified applicants because per EEOC guidance, DHS uses actual hires for the selections. Actual hires come from the NFC while selections are from applicant flow data. There is no direct way to link the hires to the specific job announcements in the applicant flow data that led to those hires. As a result, DHS uses the job announcements that closed in the FY and hires that occurred in the FY, and these two different data sets can produce varied results as reported here.

New Hires to Mission-Critical Occupations	Total #	Reportable Disability New Hires	Reportable Disability New Hires (%)
Numerical Goal	*	12%	2%
0301 MISCELLANEOUS ADMINISTRATION	19	47.37	5.26
0343 MANAGEMENT AND PROGRAM ANALYST	21	23.81	0.00
0930 REFUGEE AND ASYLUM OFFICER	11	27.27	0.00
1801 IMMIGRATION SERVICES OFFICER	43	34.88	11.63
1802 IMMIGRATION SERVICES OFFICER	46	39.13	6.52
2210 INFORMATION TECHNOLOGY SPECIALIST	9	33.33	0.00

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

         a. Qualified Applicants for MCO (PWD)   Answer   N/A

         b. Qualified Applicants for MCO (PWTD)   Answer   N/A

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

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

         a. Promotions for MCO (PWD)   Answer   Yes

         b. Promotions for MCO (PWTD)   Answer   Yes

A review of *Table B6-1* Internal Competitive Promotions by MCO was conducted. The applicant flow data was derived from Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following occupations for PWDs and PWTDs when comparing the qualified applicant pool to the number of selections for promotions: 1801 A trigger was identified when comparing the qualified applicant pool for PWDs (30.55%) and PWTDs (12.90%) to their selection rates 24.29% and 2.54%, respectively. 0301 A trigger was identified when comparing the qualified applicant pool for PWDs (34.33%) and PWTDs (16.47%) to their selection rates 29.89% and 1.85%, respectively 0343 A trigger was identified when comparing the qualified applicant pool for PWDs (49.55%) and PWTDs (18.51%) to their selection rates of 26.79% and 1.79%, respectively. 0930 A trigger was identified when comparing the qualified applicant pool for PWDs (33.77%) and PWTDs (15.58%) to their selection rates of 14.88%* and 1.53%. 1802 A trigger was identified when comparing the qualified applicant pool for PWTDs (11.21%) to their selection rate of 3.24%*. ***NOTE:** See note in C.2. above.

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

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

A. ADVANCEMENT PROGRAM PLAN

Describe the agency's plan to ensure PWD, including PWTD, have sufficient opportunities for advancement. USCIS provides sufficient advancement opportunities for those with disabilities through internal merit promotion procedures, career ladder and upward mobility positions, and training and career development programs. All employees, including veterans and PWD/ PWTD are encouraged to participate in the variety of internal development programs and training opportunities that are advertised on the HCT website and in USCIS broadcast messages. In FY 2021, the agency continued to engage in initiatives designed to ensure employees with disabilities and employees with targeted disabilities had sufficient advancement opportunities through: • Internal merit promotion procedures; career ladder and upward mobility positions; and training and career development

programs. • All employees, including veterans and PWD/ PWTD are encouraged to participate in the variety of internal development programs and training opportunities that are advertised on the HCT website and in USCIS broadcast messages. • USCIS promoted its mentoring programs for employees and for supervisors with less than two years of experience. • USCIS continued to demonstrate agency commitment and dedication to employees' growth via webinars and training events. For instance: "Developing a Plan to Further Your Career," "Learn About the Aspiring Leaders Program," "Learn About the USCIS Coaching Program," etc. These webinars and trainings helped to build new skills and cultivate employees' professional development. In FY 2022, 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) 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.

Career Development Opportunities	Total Participant Applicants (#)	Total Participant Selectees (#)	PWD Applicants (%)	PWD Selectees (%)	PWTD Applicants (%)	PWTD Selectees (%)
Fellowship Programs	0	0	0	0	0	0
Coaching Programs	310	274	Multi	Multi	Multi	Multi
Detail Programs	0	0	0	0	0	0
Internship Programs	0	0	0	0	0	0
Mentoring Programs	502	429	Multi	Multi	Multi	Multi
Training Programs	646	480	Multi	Multi	Multi	Multi
Other Career Development Programs	657	574	Multi	Multi	Multi	Multi

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 below text.

         a. Applicants (PWD)   Answer   Yes

         b. Selections (PWD)   Answer   Yes

NOTE: USCIS does not collect demographic data and detailed applicant flow data (AFD) for the career development programs identified above. USCIS will continue to work with HCT, DHS, and/or OPM to acquire access to applicant flow data as identified in the planned activities. Data excludes program participants that could not be identified in NFC. A difference was noted in the participation rate among applicants to six out of eight career programs reported (excluding the Mentoring Program for New Supervisors and Emerging Leaders Program) 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 (25.24%). The selection rate for PWDs in the Aspiring Leaders Program is slightly below the benchmark of the applicant pool.

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 below text.

         a. Applicants (PWTD)   Answer   Yes

         b. Selections (PWTD)   Answer   Yes

AWARDS

See the note in #3 above. A difference was noted in the participation rate among applicants to six out of eight career programs reported (excluding the Mentoring Program for New Supervisors and Aspiring Leaders Program) 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 (2.90%). The selection rate for PWDs in the Aspiring Leaders Program is slightly below the benchmark of the applicant pool.

5. 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 below text.

         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 PWDs who receive time off awards of 21-30 hours and cash awards of $501 - $4,999. There are triggers involving the percentage of PWTDs who receive time off awards of 11-30 hours and cash awards of $501 - $5,000 or more. The trigger for PWDs and PWTDs who receive cash awards of $501 - $999 is new. **Note:** The inclusion rate of PWD/PWTD is calculated by dividing the number of awards given PWD/PWTD in the category by the total number of PWD/PWTD in the permanent workforce and then multiplying by 100. Then the rate is compared to the corresponding inclusion rate of PWOD/PWOTD.

Time-Off Awards	Total (#)	Reportable Disability%	Without Reportable Disability %	Targeted Disability%	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	1217	11.97	4.65	14.67	11.61
Time-Off Awards 1 - 10 Hours: Total Hours	9232	91.69	35.04	118.29	88.24
Time-Off Awards 1 - 10 Hours: Average Hours	7.59	0.17	0.06	1.54	-0.01
Time-Off Awards 11 - 20 hours: Awards Given	1571	9.29	8.62	8.00	9.46
Time-Off Awards 11 - 20 Hours: Total Hours	25153	153.93	136.22	133.90	156.54
Time-Off Awards 11 - 20 Hours: Average Hours	16.01	0.36	0.12	3.19	0.00
Time-Off Awards 21 - 30 hours: Awards Given	4514	16.48	28.37	10.67	17.24
Time-Off Awards 21 - 30 Hours: Total Hours	115705	415.78	730.20	267.81	435.02
Time-Off Awards 21 - 30 Hours: Average Hours	25.63	0.55	0.20	4.78	0.00
Time-Off Awards 31 - 40 hours: Awards Given	2469	18.69	11.63	21.90	18.28
Time-Off Awards 31 - 40 Hours: Total Hours	86451	682.64	396.29	806.48	666.54
Time-Off Awards 31 - 40 Hours: Average Hours	35.01	0.80	0.26	7.01	-0.01
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability%	Without Targeted Disability%
Cash Awards: $501 - $999: Awards Given	4614	22.38	26.72	20.76	22.59
Cash Awards: $501 - $999: Total Amount	3352511.66	15793.65	19583.14	14833.02	15918.55
Cash Awards: $501 - $999: Average Amount	726.6	15.47	5.70	136.08	-0.21
Cash Awards	**Total (#)**	**Reportable Disability %**	**Without Reportable Disability %**	**Targeted Disability%**	**Without Targeted Disability%**
Cash Awards: $1000 - $1999: Awards Given	6881	36.75	38.52	33.14	37.22
Cash Awards: $1000 - $1999: Total Amount	10280714.16	53154.11	58326.30	47583.19	53878.41
Cash Awards: $1000 - $1999: Average Amount	1494.07	31.70	11.77	273.47	0.26
Cash Awards: $2000 - $2999: Awards Given	4468	18.89	27.09	15.43	19.34
Cash Awards: $2000 - $2999: Total Amount	10930752	44934.21	66780.49	37571.43	45891.48
Cash Awards: $2000 - $2999: Average Amount	2446.45	52.13	19.16	463.85	-1.40

Cash Awards: $3000 - $3999: Awards Given	1505	6.42	9.16	7.81	6.24
Cash Awards: $3000 - $3999: Total Amount	5029291	21347.14	30652.23	26330.67	20699.21
Cash Awards: $3000 - $3999: Average Amount	3341.72	72.86	26.00	642.21	-1.17
Cash Awards: $4000 - $4999: Awards Given	459	2.02	2.74	1.90	2.03
Cash Awards: $4000 - $4999: Total Amount	2001317	8835.85	11951.19	8351.05	8898.89
Cash Awards: $4000 - $4999: Average Amount	4360.17	96.04	33.86	835.10	-0.05
Cash Awards: $5000 or more: Awards Given	39	0.33	0.18	0.00	0.37
Cash Awards: $5000 or more: Total Amount	201561	1678.33	931.48	0.00	1896.53
Cash Awards: $5000 or more: Average Amount	5168.23	111.89	40.50	0.00	126.44

6. 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 below text.

       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.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability%	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	50	0.13	0.33	0.19	0..12

7. 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 below text.

       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.

C. 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 below text.

   a. SES

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

         ii. Internal Selections (PWD)   Answer   N/A

   b. Grade GS-15

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

         ii. Internal Selections (PWD)   Answer   Yes

   c. Grade GS-14

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

         ii. Internal Selections (PWD)   Answer   Yes

   d. Grade GS-13

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

         ii. Internal Selections (PWD)   Answer   Yes

Based on Table B7-1: Triggers were identified for selections of PWDs at the senior grade levels when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. GS-15 A trigger was identified when comparing the qualified internal applicants for PWDs (24.11%) to their selection rate of 17.39%. GS-14 A trigger was identified when comparing the qualified internal applicants for PWDs (34.84%) to their selection rate of 22.11%. GS-13 A trigger was identified when comparing the qualified internal applicants for PWDs (40.03%) to their selection rate of 20.85%. These triggers are new. There was no AFD to validate qualified internal applicants or selections for SES candidates. NOTE: Relevant applicant pool data is not available to properly validate qualified internal applicants. Relevant applicant pool data is not available. Internal announcements often have an area of consideration that is broader than the agency. They may be government-wide to expand the applicant pool and recruit the best talent into the agency. As a result, the current USCIS workforce, or a subset of it (employees in an MCO, employees at next lower grade level, and so forth) is not a relevant applicant pool. Identifying which current USCIS employees would qualify for a job series they are not currently in is a difficult undertaking. HCT does not adjudicate applicant qualifications until an applicant applies for a specific position. The applicant may qualify based on experience obtained prior to entry into their current job series. USCIS has not attempted to develop estimated relevant applicant

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 below text.

   a. SES

         i. Qualified Internal Applicants (PWTD)   Answer   N/A

ii. Internal Selections (PWTD)   Answer   N/A

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

Based on Table B7-1: Triggers were identified for selections of PWTDs at the senior grade levels when comparing the participation rate of selections to the percentage of qualified internal applicants by senior grade levels. GS-15 A trigger was identified when comparing the qualified internal applicants for PWTDs (12.50%) to their selection rate of 2.17%. GS-14 A trigger was identified when comparing the qualified internal applicants for PWTDs (9.79%) to their selection rate of 1.01%. GS-13 A trigger was identified when comparing the qualified internal applicants for PWTDs (16.14%) to their selection rate of 2.37% were PWTDs. There was no AFD to validate qualified internal applicants or selections for SES candidates. Relevant applicant pool data is not available to properly validate qualified internal applicants. *See note*

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 below text. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the below text.

    a. New Hires to SES (PWD)   Answer   N/A

    b. New Hires to GS-15 (PWD)   Answer   Yes

    c. New Hires to GS-14 (PWD)   Answer   Yes

    d. New Hires to GS-13 (PWD)   Answer   No

Based on Table B7-1: Triggers were identified for new hires of PWDs at the senior grade levels when comparing the participation rate of new hires to the percentage of qualified internal applicants by senior grade levels. GS-15 A trigger was identified when comparing the qualified internal applicants for PWDs (37.50%) to their selection rate of 9.09%*. GS-14 A trigger was identified when comparing the qualified internal applicants for PWDs (31.91%) to their selection rate of 24.24%. These are new triggers. There was no AFD to validate new hires of SES candidates. ***NOTE:** Some selections are higher than qualified applicants (or referred applicants) because per EEOC guidance, DHS uses actual hires for the selections. Actual hires come from the NFC while selections are from applicant flow data. There is no direct way to link the hires to the specific job announcements in the applicant flow data that led to those hires. As a result, DHS uses the job announcements that closed in the FY and hires that occurred in the FY, and these two different data

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 below text.

a. New Hires to SES (PWTD) Answer N/A

b. New Hires to GS-15 (PWTD) Answer Yes

c. New Hires to GS-14 (PWTD) Answer Yes

d. New Hires to GS-13 (PWTD) Answer Yes

Based on Table B7-1: Triggers were identified for new hires of PWTDs at the senior grade levels when comparing the participation rate of new hires to the percentage of qualified internal applicants by senior grade levels. GS-15 A trigger was identified when comparing the qualified internal applicants for PWTDs (12.50%) to their New Hire rate of 9.09%. * GS-14 A trigger was identified when comparing the qualified internal applicants for PWTDs (17.02%) to their New Hire rate of 3.03%. GS-13 A trigger was identified when comparing the qualified internal applicants for PWTDs (5.56%) to their New Hire rate of 5.26%. These triggers are new. There was no AFD to validate new hires of SES candidates.

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

    a. Executives

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

        ii. Internal Selections (PWD) Answer Yes

    b. Managers

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

        ii. Internal Selections (PWD) Answer Yes

    c. Supervisors

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

        ii. Internal Selections (PWD) Answer No

Based on Table B8-1: Triggers were identified for promotions of PWDs to supervisory positions when comparing the participation rate of promotions to the percentage of qualified internal applicants by supervisory position. Executives A trigger was identified when comparing the qualified internal applicants for PWDs (21.88%) to their promotion selection rate of 16.91%*. Managers A trigger was identified when comparing the qualified internal applicants for PWDs (36.18%) to their promotion selection rate of 25.98%. These are new triggers. Executives are identified based on their hiring authority (for example, SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. Relevant applicant pool data is not available to properly validate qualified internal applicants. **NOTE:** See note in D.3. above.

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 below text. Select "n/a" if the applicant data is not available for your agency and describe your plan to provide the data in the below text.

    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

Based on Table B8-1: Triggers were identified for promotions of PWTDs to supervisory positions when comparing the participation rate of promotions to the percentage of qualified internal applicants by supervisory position. Executives A trigger was identified when comparing the qualified internal applicants for PWTDs (10.42%) to their promotion rate of 0%. There were no Executives selected. Managers A trigger was identified when comparing the qualified internal applicants for PWTDs (12.21%) to their promotion rate of 2.36%. Supervisors A trigger was identified when comparing the qualified internal applicants for PWTDs (21.43%) to their promotion rate of 2.86%*. Relevant applicant pool data is not available to properly validate qualified internal applicants. Executives are identified based on their hiring authority (for example, SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. ***NOTE:** *See note D.3.*

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 below text.

      a. New Hires for Executives (PWD)   Answer   Yes

      b. New Hires for Managers (PWD)   Answer   Yes

      c. New Hires for Supervisors (PWD)   Answer   No

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

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

      a. New Hires for Executives (PWTD)   Answer   Yes

      b. New Hires for Managers (PWTD)   Answer   Yes

      c. New Hires for Supervisors (PWTD)   Answer   No

Based on Table B8-1: Triggers were identified for new hires of PWTDs to supervisory positions when comparing the participation rate of new hires to the percentage of qualified applicants by supervisory position. Executives A trigger was identified when comparing the qualified applicants for PWTDs (12.50%) to their new hire rate of 0%. The trigger for Executives is new. Managers A trigger was identified when comparing the qualified applicants for PWTDs (28.57%) to their new hire rate of 5.26%*. Executives are identified based on their hiring authority (for example, SES), managers are GS-13 and GS-14, and supervisors are GS-12 and below. *NOTE*: *See note in D.3. above.*

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.

<div align="right">Answer   No</div>

USCIS tracks individuals who are on an excepted service appointment including those on a Schedule A appointment and provides reports to offices advising when a person is eligible for conversion to a competitive service appointment. Managers are responsible for conversion or any further action. OEOI and HCT will review FY 2021 Schedule A eligible non-conversions to analyze reasons for non-conversions in FY 2022, will continue to closely monitor the progress of Schedule A separations and conversions, and is implementing an action plan to resolve the discrepancies. In FY 2021, USCIS converted 80 Schedule A employees out of 110 (73%) who were eligible. This is an increase of 17% compared with FY 2020. Of those converted: • 80 (72.72%) were converted to career or career- conditional appointments, • 20 (18.18%) were eligible but not converted (a decrease of 11 or 23.15% from FY 2020), • There were 17 separations of which 10 (9.09%) were Schedule A separations before conversion.

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

Table B-1 was reviewed. PWDs in the permanent workforce are exceeding the inclusion rate benchmark for voluntary and involuntary separations. Voluntary Separations: A trigger was identified when comparing the inclusion rate for PWDs (4.65%) to the PWODs inclusion rate of 3.47%. The PWD rate increased 0.36% (25) from FY 2020. Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWDs (3.27%) to the PWODs inclusion rate of 2.27%. The PWD rate decreased 0.35% (9) from FY 2020. *NOTE*: For reporting purposes, resignations and retirement are counted as voluntary separations.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	50	0.28	0.27
Permanent Workforce: Resignation	291	2.26	1.38
Permanent Workforce: Retirement	386	2.35	2.05
Permanent Workforce: Other Separations	413	2.96	2.04
Permanent Workforce: Total Separations	1140	7.86	5.73

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

      a. Voluntary Separations (PWTD)   Answer No

      b. Involuntary Separations (PWTD)   Answer Yes

Table B-1 was reviewed. PWTDs in the permanent workforce are exceeding the inclusion rate benchmark for involuntary separations. Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWTDs (3.62%) to the PWODs inclusion rate of 2.53%. The PWTD rate decreased slightly from FY 2020. In FY 2020 there was a trigger for PWTD voluntarily separating from the agency.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Removal	50	0.38	0.27
Permanent Workforce: Resignation	291	1.89	1.59
Permanent Workforce: Retirement	386	1.70	2.14
Permanent Workforce: Other Separations	413	3.22	2.24
Permanent Workforce: Total Separations	1140	7.20	6.24

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 2021 USCIS exit survey data was not disaggregated by demographics. There was a 26.40% response rate on the survey (301/1,140 separations). When asked "What specific reasons are affecting your decision as it relates to diversity/inclusion barriers? (Select all that apply)" 4/19 (21.05%) respondents selected disability. Data from the FY 2021 USCIS EEO and Diversity Climate Survey show that there are differences in perception between PWD and PWOD of the climate for diversity and inclusion with PWDs having a less favorable view. Among the PWD who indicated an intent to leave their positions 29.65% planned to leave USCIS and 9.69% planned to retire. By comparison, 20.57% PWOD planned to leave and 7.23% planned to retire.

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: 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.

Eight facilities (Charleston Field Office, Helena Field Office, Honolulu Field Office, Memphis Field Office, Mt. Laurel Field Office, West Palm Beach Field Office, Louisville Field Office, and Newark Asylum Office) have had automatic door openers installed in fiscal year 2021. Fifty-two facilities remain. USCIS plans to install automatic door openers at the remaining locations between fiscal years 2022-2025.

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 2021 because the DHS-operated system used for tracking reasonable accommodations does not have capability to calculate processing time frames or to produce reports that comply with the MD-715. USCIS has identified an alternative system with the ability to provide accurate data regarding processing time for reasonable accommodations. A decision on funding is pending.

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.

There were 550 employees who submitted requests for accommodation resulting in 787 specific accommodations. This included, but was not limited to, electronic equipment, ergonomic chairs, telework, job duty modification, alternative work schedules, software, and sign language interpreters. • In order to accommodate an employee needing Communication Access Realtime Translation (CART) services, RAIO created a Position Description and announced the position on USAJOBS. • USCIS continued the best practice of an internally funded centralized accommodation fund which was allocated $3,420,537 for FY 2021, and 93% of the allocated amount was executed. USCIS trained 408 supervisors and 466 employees on the reasonable accommodation process during FY 2021 with a total of eight sessions held. • USCIS also

worked on process improvements through the modification of management directives, updates to forms used in the reasonable accommodations process, and proposed enhancements to the tracking system utilized by USCIS, the Accessibility Compliance Management System (ACMS). • Reasonable accommodation procedures were submitted to the EEOC on 9/20/2021 and are pending review. *See Part H 4.*

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 updated management directive on Disability Accommodation and Personal Assistance Services for Employees and Job Applicants are under review by the EEOC and pending update to the USCIS external and internal websites. The current procedures and EEOC guidance on PAS and new rule implementing Section 501 are posted to the USCIS external and internal websites (uscis.gov/ about-us/affirmative-action-plan-recruitment-hiring).

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 2021: • In response to question one, PWDs alleged harassment in 22 out of 88 formal complaints (25.00%) which is higher than the government-wide average of 22.10% and higher than the FY 2020 rate of 20.82%. • In response to question two, there were 10 settlement agreements and no findings of discrimination.

Section VIII: Identification and Removal of Barriers

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

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

   Answer   Yes

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

   Answer   Yes

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

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

Specific Workforce Data Table: Workforce Data Table - B6

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:
Trigger 1. Lower than expected participation among PWD and/or PWTDs in 1) new hires and promotions for MCOs, in senior grades, and for supervisory positions.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

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

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

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

Objective(s) and Dates for EEO Plan:
Date Initiated: 10/01/2017
Target Date: 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified: 12/31/2023
Date Completed: 12/31/2023

Objective Description
Examine the reason for the trigger.

Responsible official(s)
Title/Name/Standards Address the Plan?
   o   Division Chief, Complaints Resolution Division, OEOI/ Rebecca Arsenault-Herize/ No
   o   Human Resources Specialist, Human Capital and Training (HCT)/ Robyn Logsdon/ No
   o   Supervisory. Equal Employment Specialist, Diversity and Inclusion Division, OEOI/ Morenike Ogebe/ No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018
Planned Activities: 1. OEOI and HCT will partner to identify and implement strategies to increase recruitment of PWTD.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2018
Planned Activities: 2. OEOI will monitor applicant data of PWTD in major occupations to identify trends.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2022
Completion Date: 09/30/2018

Target Date: 09/30/2018
 Planned Activities: 3. OEOI will develop a Quick Reference Guide for Disability hiring for managers. (*Now activity 1-1*)
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2022
Completion Date: 09/30/2021

Target Date: 09/30/2018
 Planned Activities: 4. OEOI will develop and conduct a pilot program to identify entry level and promotional
 opportunities for PWDs. (*Now activity 2-1*).
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2023
Completion Date: N/A

Target Date: 09/30/2020
 Planned Activities: 4-1 OEOI and HCT will collaborate to review merit promotion data for indications of triggers/barriers.
Sufficient Staffing & Funding? Yes
Modified Date: 12/30/2022
Completion Date: N/A

Target Date: 09/30/2018
 Planned Activities: 5. OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach Plan
 (CROP).
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2019
Planned Activities: 6. OEOI and HCT will collaborate to monitor and review promotions and identify trends. (*Now activity 3-1*).
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2019
Completion Date: 09/30/2020

Target Date: 09/30/2019
Planned Activities: 7. OEOI and HCT will collaborate to develop a plan to review policies, practices and procedures related to promotion. (*Now activity 5-1*).
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2023
Completion Date: N/A

Target Date: 09/30/2020
Planned Activities: 8. OEOI and HCT will review and analyze results of the Merit Promotion study. (*Now activity 6-1 and 3-2*).

Sufficient Staffing & Funding: Yes
Modified Date: 12/31/2023
Completion Date: N/A

Target Date: 09/30/2020
 Planned Activities: 9. OEOI and HCT will work with DHS CRCL to access AFD by disability to effectively analyze
 percent of qualified candidates for promotions as required by MD-715. (*Now activity 7-1*).
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2023
Completion Date: N/A

Target Date: 09/30/2021
 Planned Activities: 10. OEOI will develop a disability demographic snapshot and distribute to HCT and senior
 leadership. (*Now activity 8-1*).
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2022
Completion Date: N/A

Report of Accomplishments

Fiscal Year Accomplishment 2018

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

Planned Activity 3:
Conducted a baseline study of best practices from other federal agencies and created a project outline for submission to leadership for approval. HCT/ SPPC received approval to visit other DHS' Components to understand more about components' procedures, processes, and policies.

Planned Activity 4: Held meetings with several hiring offices including the Potomac Service Center (PSC) and the Vermont Service Center (VSC).

Planned Activity 5:
HCT in partnership with OEOI developed and submitted the Coordinated Recruitment and Outreach Plan (CROP) for FY19 to the Department (DHS). The plan supports a strategic and unified approach to recruit a diverse workforce while improving the performance and efficiency of USCIS operations. OEOI provided a race, ethnicity, and gender profile for FY18 and a mission critical position gap analysis was conducted to identify the groups with low representation rates in the 1801 series 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.

Fiscal Year Accomplishment 2019
Modifications: Updated planned activities to include responsible POCs. The trigger statement was combined with former trigger number 6, to address the triggers together more effectively; this resulted in additional planned activities #6-10. The 0301 MCO for new hires was no longer a trigger so it was removed and the 2210 MCO for new hires and promotions was added as a new trigger.

Accomplishments: A planned activity was added to develop further awareness among senior managers and

HCT staffing about triggers among the disability workforces.

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

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

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

Report of Accomplishments

Fiscal Year Accomplishment 2020

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

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

Fiscal Year Accomplishment 2021

Modifications and Accomplishments:

Activities X-1

Continued activities identified in FY2020.

Quick Reference Guide was prepared and is pending senior management review.

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

• OEOI collaborated with HCT (HROC) and developed.

• USCIS' Disability Recruiting Posters to be used at outreach and recruitment events and activities that targeted PWDs.

• Four EEO Disability One Pagers.

• HCT revised the Special Hiring Authorities Brochure that highlights the Schedule A Hiring Authority.

• OEOI collaborated with Nebraska Service Center to explore identifying several positions for Schedule A hires (ongoing) (*See 2-1*).

• HCT (HROC) developed a webinar on "Strategic Recruiting: Utilizing the Schedule A Hiring Authority for Individuals with Disabilities."

• OEOI, HROC and OP&Q met and discussed Neurodiversity hiring and identified and met with Microsoft and CACI to learn their best practices in recruiting and retaining employees who are neurodivergent.

• Solicited and expanded collaboration with program offices and directorates' participation in disability outreach

• Administered My EPP Disability Resurvey Campaign during National Disability Employment Awareness Month through the end of FY 2021.

• Disability Employment Toolkit for Hiring Managers was finalized.

• HCT has initiated over 200 enhancements from Monster Hiring Management Enterprise to include changes to better track AFD by ERIG and disability and manage assessments of persons with disabilities (*see 7-1 and 1-2, and Part H.6.*)

• Activity 8-1 was modified to include DEIA initiatives.

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

next year's report.

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:
Trigger 2. A higher number of PWD and PWTD voluntarily and involuntarily separated from the agency than persons without disabilities/ targeted disabilities.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:
Barrier Group ~ People with Disabilities and People with Targeted Disabilities
Barrier Analysis Process Completed? No
Barrier(s) Identified? No

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

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

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017
Target Date: 09/30/2018
Sufficient Funding/ Staffing? Yes
Date Modified: 12/31/2023
Date Completed: N/A

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

Responsible Official(s)
Title/Name/Standards Address the Plan?
- o   Supervisory Equal Employment Specialist, Diversity, and Inclusion Division, OEOI / Morenike Ogebe / No
- o   Human Resources Specialist, HCT / Robyn Logsdon / No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018
Planned Activities: 1. OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018
Planned Activities: 2. OEOI will monitor separation data of PWD to identify trends.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2018
Planned Activities: 3. OEOI will monitor exit survey results for separation trends of PWD.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2018
Planned Activities: 4. OEOI will review tracking of ERIG and disability in career development programs.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2018
Planned Activities: 5. OEOI will conduct the third bi-annual EEO Climate Survey.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2020
Planned Activities: 5-2 OEOI will analyze Climate Survey results.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2022
Completion Date: N/A

Target Date: 09/30/2018
Planned Activities: 6. OEOI and HCT will continue to partner with DHS and OPM to develop best practices to access and track AFD for internal promotions. (*Now activity 1-2*)
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2023
Completion Date: N/A

Target Date: 09/30/2019
Planned Activities: 7. OEOI and HCT will collaborate to conduct a review of merit promotions for indications of barriers. (*Now activity 2-2*).
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2023
Completion Date: N/A

Target Date: 03/31/2021

Planned Activities: 8. OEOI and HCT will collaborate to review and analyze results of merit promotions study. (*Now activities 6-1 and 3-2*).
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2023
Completion Date: N/A

Target Date: 09/30/2019
 Planned Activities: 9. OEOI will analyze Climate survey results for retention data on PWD/PWT.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2019

Target Date: 09/30/2020
Planned Activities:10. OEOI will administer fourth EEO and Diversity Climate Survey with questions focused on PWD/PWTD triggers. (*Now activity 4-2*).
Sufficient Staffing & Funding? Yes
Modified Date: 07/14/2021
Completion Date: N/A

Report of Accomplishments

Fiscal Year Accomplishment 2018
Modifications: Modified the trigger statement and objective to include a trigger for persons with targeted disabilities in involuntary and voluntary separations; added clarification to Planned Activity #4; added Planned Activity #8.

Planned Activity 1:
HCT and OEOI collaborated to work on several recruitment actions for PWD and PWTD as reported in this plan. See Part H, B.3.a. and Part J, Section III A, above.

Planned Activity 2 and 3:
Separation data and exit survey data were collected and reviewed and results are reported in this plan.

Planned Activity 4:
OEOI worked with HCT Training and Career Development Division (TCDD) and established a new procedure to manually collect applicant data on programs to initiate tracking of demographic data by ERIG and disability. The data was reviewed, analyzed, and reported in this plan.

Planned Activity 4 and 6:
HCT is testing a Human Capital Business Systems (HCBS) end-to-end (E2E) solution by Monster Government Solutions which is intended to support all personnel action processing throughout an employee's lifecycle and interface with the National Finance Center (NFC) and the Office of Personnel Management (OPM) to allow HR Specialists to service all human capital functions including recruitment, assessment, selection, onboarding, awards. With this acquisition, USCIS plans to address limitations to the applicant flow identified above. (See additional detail in Part H, measures E.4.a.2. and E.4.a.4.)

Fiscal Year Accomplishment 2019
Modification: Planned activities were updated to include responsible POCs.

Accomplishments: FY 2018 EEO and Diversity Climate Survey results were reviewed to analyze PWD responses as compared with PWOD ones. PWD revealed that they believed they were more likely to be discriminated against and witness/experience discrimination/harassment than PWOD.

PWD witnessed or experienced discrimination on the bases of age, gender, and disability, respectively more than any other bases.

The most prevalent issues witnessed or experienced by PWDs were Work Assignments (54%), Promotion/Non-Selection (41%) and Performance/Evaluation (41%) in contrast with all respondents to the survey who identified harassment, promotion/non-selection, and work assignments, respectively.

Although PWDs value diversity and have a favorable view of the organization, it is less favorable than PWOD. PWDs were considering leaving more than PWOD with 54.15% responding affirmatively.

OEOI partnered with HCT to discuss with Monster solutions about requirements to track AFD. There have been improvements in accessibility to AFD each year but, as identified in Part H, there remain some deficiencies.

Two additional career development programs were tracked and reported on by HCT this year and OEOI manually provided the demographic data. USCIS continues to monitor trends on separations. A merit promotion review will be conducted in FY 2020.

Fiscal Year Accomplishment 2020

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

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 Accomplishment 2021

Activities X-2

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

Planned Activity 7:

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

Source of the Trigger: EEO Complaint(s)
Specific Workforce Data Table: Workforce Data Table - B1

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

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

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:

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

STATEMENT OF IDENTIFIED BARRIER:

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

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

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017
Target Date: 09/30/2019
Sufficient Funding / Staffing? Yes
Date Modified: 09/30/2021
Date Completed: N/A

Objective Description

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

Responsible Official(s)

Title / Name / Standards Address the Plan?
- o Supervisory Equal Employment Opportunity Specialist, Disability Accommodations Program, OEOI /Sandra Sutton / No
- o Division Chief, Complaints Resolution, OEOI / Rebecca Arsenault-Herize / No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018
Planned Activities: 1. OEOI will review and monitor harassment and reasonable accommodation complaints by PWD and identify trends.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2020
Completion Date: 09/30/2020

Target Date: 03/31/2018
Planned Activities: 2. OEOI will issue a new EEO policy statement with strong language on anti-harassment.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 12/13/2019

Target Date: 09/30/2019
Planned Activities: 3. OEOI will review the reasonable accommodations process and identify opportunities for efficiencies.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2020
Completion Date: 09/30/2020

Target Date: 09/30/2018
Planned Activities: 4. OEOI will identify and implement ways to educate managers on prevention of harassment, discrimination, and reprisal.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/11/2018

Target Date: 09/30/2018
Planned Activities: 5. OEOI will create and implement an Anti-Bullying initiative. (*Now activity 2-3*)
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2020
Completion Date: 09/30/2020

Target Date: 09/30/2020
Planned Activities: 1-3. OEOI will issue a new EEO policy statement with strong language on anti-harassment.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2021
Completion Date: 09/30/2021

Report of Accomplishments

Fiscal Year Accomplishments 2018

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

Planned Activity 1:
This activity is extended and will be ongoing in FY 2019.

Planned Activity 2:
The USCIS Director issued the USCIS Equal Employment Opportunity and Harassment Policy Statement on January 19, 2018, reaffirming the agency's commitment to equal employment opportunity and non-tolerance for discrimination, including workplace harassment.

Planned Activity 3:
In collaboration with OIDP, OEOI initiated a review of the Reasonable Accommodation program in 2018 with a focus on process improvement, particularly in contracting services. The standard operating procedures (SOP) are in development and recommendations are pending. In addition, DHS CRCL began an agency wide overhaul of ACMS, the database that tracks accommodation requests, the enhancements are ultimately intended to build efficiencies into the system for tracking and reporting. These projects are ongoing.

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

Planned Activity 5:
This is an ongoing initiative. Some research and benchmarking were done to baseline the initiative

Fiscal Year Accomplishment 2019

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

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

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

Fiscal Year Accomplishment 2020

Modifications: Activities were revised and renumbered to consolidate them.

Activities: OEOI continued to review and monitor harassment and reasonable accommodation complaints by PWDs, identified trends and opportunities for efficiencies in the reasonable accommodations process, and worked on identifying and implementing ways to educate managers on prevention of harassment, discrimination, and reprisal (*former activities 1, 3, and 4*) including:
- 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 Accomplishments 2021

Accomplishments X-3

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

Source of the Trigger: Workforce Data (*if so, identify the table*)
Specific Workforce Data Table: Workforce Data Table - B9

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:
Trigger 4. PWD and PWTD received less time off awards, cash awards, and Quality Step Increases (QSIs) of specific denominations as compared with persons without disabilities and persons without targeted disabilities.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS:
Barrier Group ~ People with Disabilities and People with Targeted Disabilities
Barrier Analysis Process Completed? No
Barrier(s) Identified? No

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

Objective(s) and Dates for EEO Plan

Date Initiated: 10/01/2017
Target Date: 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified: 09/30/2025
Date Completed: N/A

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

Responsible Official(s)
Title / Name / Standards Address the Plan?
- o   Human Resources Specialist, HCT / Robyn Logsdon / No
- o   Supervisory EEO Specialist, Disability Accommodations Program, OEOI / Sandra Sutton / No

Planned Activities Toward Completion of Objective

Target Date: 09/30/2018
Planned Activities: 1-4 OEOI and HCT will collaborate to track and benchmark performance and awards (time off awards, cash awards, QSIs, recognition). (*Former activities 1 and 2*).
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2023
Completion Date: N/A

Planned Activities Toward Completion of Objective

Target Date: 09/30/2019
Planned Activities: 3. OEOI and HCT will review and analyze performance and awards (time off awards, cash awards and QSIs, recognition). (*Former activity 4-3; Now activity 2-4*).
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2024
Completion Date: N/A

Target Date: 09/30/2021
Planned Activities: 4. OEOI and HCT will collaborate with DHS CRCL/ OCHCO to review and develop best practices in recognition and awards policies and procedures and determine next steps. *(Now activity 3-4)*.
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2025
Completion Date: N/A

Report of Accomplishments

Fiscal Year Accomplishment 2018
Modifications: The statement of the objective was modified. Planned activity 1 was modified to initiate an analysis of awards and activity 2 was modified to complete the analysis 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.

Fiscal Year Accomplishment 2019
Modifications: Planned activities were updated to include responsible POCs. The statement of the trigger was modified to include time off awards of various amounts of hours. Planned Activity #4 was added to ensure an effective program review and because it will be the inaugural review of the awards program. Activities are pending.

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

Fiscal Year Accomplishment 2020
Modifications: Description of the trigger was modified. Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Former activities 1 and 2 were combined. Dates were extended to allow reasonable time to accomplish objectives.

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

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

Fiscal Year Accomplishment 2021

Accomplishments: Activities X-4

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

• 1-4 date modified to allow time to achieve target.

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER
Trigger 5. Based on Schedule A workforce data. The agency did not convert all eligible Schedule A employees with a disability into the competitive service after two years of satisfactory service.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

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

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

OBJECTIVE(S) AND DATES FOR EEO PLAN

Date Initiated: 10/01/2017
Target Date: 09/30/2018
Sufficient Funding / Staffing? Yes
Date Modified: 09/30/2022
Date Completed: N/A

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

Responsible Official(s)
Title / Name / Standards Address the Plan?
- o   HR Specialist, HCT / Robyn Logdon / No
- o   Disability Accommodations Program, Supervisory Equal Employment Specialist, OEOI /Sandra Sutton / No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Planned Activities: 1. OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.
Target Date: 09/30/2018
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2018
Planned Activities: 2. HCT and OEOI will collaborate to review Schedule A processes and identify opportunities for efficiencies.
Sufficient Staffing & Funding? Yes
Modified Date: N/A
Completion Date: 09/30/2018

Target Date: 09/30/2018
Planned Activities: 3. HCT and OEOI will review and analyze procedures and develop best practices for Schedule A eligible for conversion who are not converted. *(Now activity 1-5)*.
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2022
Completion Date: N/A

Target Date: 09/30/2019
Planned Activities: 4. OEOI and HCT will collaborate to analyze specific cases of non-conversion to determine reasons and develop a plan to address discrepancies. *(Former activity 3 and 4; Now activity 2-5)*
Sufficient Staffing & Funding? Yes
Modified Date: 09/30/2020
Completion Date: 09/30/2020

Report of Accomplishments

Fiscal Accomplishment 2018
Modifications: The statement of the objective was modified for clarity and action plan 4 was initiated to continue to another level of the barrier analysis.

Planned Activity 1 and 2:
A working group was established in FY 2018 to identify best practices and areas where efficiencies may be needed to track the life cycle of Schedule A employees. The group has identified areas in the Schedule A lifecycle where processing may be ineffective and is working on an action plan to address the issues. Reports on "excepted service" employees including Schedule A employees are provided to managers and Selective Placement Coordinator (SPPC) on a monthly basis. The report includes the list of Schedule A employees whose appointments are due for conversion. Also, the SPC will track and contact supervisors directly to discuss employees who are appointed under Schedule A for longer than two years.

Planned Activity 3 (Closed out):
HCT began this process but did not complete it mostly because current HR reporting systems were not capable of generating a single comprehensive report. Separate databases contain different sets of data and required manual tracking to combine the data to make it useful. However, DHS CRCL provided USCIS with Schedule A conversion data for FY 2018 and has agreed to continue extracting and sharing Schedule A data for the foreseeable future. An initial review of the data indicates that not all eligible Schedule A employees were converted (73 were converted out of 109 eligible) for a variety of reasons that are not clear. Further analysis needs to be done in collaboration with HCT to investigate the reasons the specific personnel identified were not converted therefore Planned Activity 4 was initiated.

Fiscal Accomplishment 2019
Planned Activities 3 and 4: HCT and OEOI began discussions and shared ideas on how to determine reasons for non-conversion and has a working group identified to begin work on this trigger.

Fiscal Accomplishment 2020

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

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

o   Conducted a review of the FY 2019 non-conversions and identified reasons for non-conversion.

o   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 Accomplishment 2021

Accomplishments: Activities X-5

1-5 date modified to allow time to achieve target.

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

STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER
Trigger 6. There are fewer PWD and PWTDs selected than applied to specific career development programs.

Provide a brief narrative describing the condition at issue.

How was the condition recognized as a potential barrier?

STATEMENT OF BARRIER GROUPS
Barrier Group ~ People with Disabilities and People with Targeted Disabilities
Barrier Analysis Process Completed**?** No
Barrier(s) Identified? No

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

OBJECTIVE(S) AND DATES FOR EEO PLAN

Date Initiated: 10/01/2017
Target Date: 09/30/2019
Sufficient Funding / Staffing? Yes
Date Modified: 09/30/2024
Date Completed: N/A

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

Responsible Official(S)
Title/ Name/ Standards Address the Plan?
   o   Supervisory Equal Employment Specialist Diversity and Inclusion Division, OEOI / Morenike Ogebe / No
   o   Human Resources Specialist, HCT /Robyn Logsdon/No

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2019
Planned Activities: 1. OEOI will coordinate with HCT to benchmark and develop AFD framework for USCIS career development programs. (Now activity 1-6).
Sufficient Staffing & Funding? Yes
Modified Date: 12/31/2023
Completion Date: N/A

PLANNED ACTIVITIES TOWARD COMPLETION OF OBJECTIVE

Target Date: 09/30/2024
Planned Activities: OEOI will coordinate with HCT to review and analyze career development program policies and procedures. *(Now activity 2-6).*
Sufficient Staffing & Funding: Yes
Modified Date: 09/30/2024
Completion Date: N/A

Report of Accomplishments

Fiscal Year Accomplishments Fiscal Year 2018
New trigger.

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

The primary reason activities were not timely completed was due to a lack of resources.

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

N/A

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

N/A

Fiscal Year Accomplishments 2019
Modification: Due date for Planned Activity #1 has been pushed back to 9/30/2020. HCT (TCDD) and OEOI will discuss and establish a baseline on required training and career development reporting for USCIS HQ programs.

Accomplishments: Data on the USCIS mentoring programs was reviewed in FY 2019. However, further review is needed to determine if all relevant data was properly collected on applicants and selectees throughout the process. Some initial training/career development policies were identified
for review. HCT continued to test and discuss Monster Solutions for the potential collection of demographic data in multiple areas including training and career development programs. See Part H E.4.a.2. and E.4.a.4.

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

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

Fiscal Year Accomplishments 2021
Accomplishments: Activities X-6
1-6 date modified to align with revised activities. Aligns with Part H.6.