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

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

Section I: Efforts to Reach Regulatory Goals

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

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

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

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

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

2. Using the goal of 2% as the benchmark, does your agency have a trigger involving PWTD by grade level cluster in the permanent workforce? If "yes", describe the trigger(s) in the text box.

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

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

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	14787	3731	25.23	399	2.70
Grades GS-11 to SES	5696	1563	27.44	209	3.67

3. Describe how the agency has communicated the numerical goals to the hiring managers and/or recruiters.
    Through agency-wide publication of the FY 2022 Annual EEO Program Status Report (MD-715).
    • In ad hoc training sessions delivered by HCT and OEOI on non-competitive hiring authorities for persons with disabilities.
    • During recruitment strategy discussions with managers, HCT discussed the use of both competitive job announcements and non-competitive options like Schedule A for people with disabilities and 30% or more disabled veterans.
    • During the State of the Agency address to the Director and senior managers on June 27, 2023.
    • During EEO and DEIA POD Assessments conducted with program offices and directorates.

Section II: Model Disability Program

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

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

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

   Answer   Yes

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

Disability Program Task	# of FTE Staff By Employment Status, Full Time	# of FTE Staff By Employment Status, Part Time	# of FTE Staff By Employment Status, Collateral Duty	Responsible Official (Name, Title, Office Email)
Special Emphasis Program for PWD and PWTD	0	1	110	Morenike Ogebe D&I Supervisory EEO Specialist, OEOI Morenike.ogebe@uscis.dhs.gov
Processing applications from PWD and PWTD	0	84	0	Shannon Sarbo Branch Chief, Recruitment and Placement, HROC, HCT shannon.r.sarbo@uscis.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	0	84	0	Shannon Sarbo Branch Chief, Recruitment and Placement, HROC, HCT shannon.r.sarbo@uscis.dhs.gov
Section 508 Compliance	0	1	0	Ken Moser Branch Chief and Section 508 Coordinator kenneth.s.moser@uscis.dhs.gov
Processing reasonable accommodation requests from applicants and employees	6	0	50	Sandra M. Sutton DAP Supervisory. EEO Specialist, OEOI sandra.m.sutton@uscis.dhs.gov
Architectural Barriers Act Compliance	0	17	0	Katherine. D. Williamson, Chief, Facilities Management Division, Office of Administration katherine.d.williamson@uscis.dhs.gov

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

• DEIA Summit 2022: A Whole-of-Government Approach to Disability Employment (December 6, 2022)

• LRP Federal Webinar: "Getting Reasonable Accommodations of Disabilities Right for Federal Remote, In-Person and Hybrid Work" (February 15, 2023)

• DHS EEO and Diversity Training Conference: Governing Fair Employment Practices (September 13, 2023)

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer   Yes

Section III: Program Deficiencies in the Disability Program

A. Brief Description of Program Deficiency

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

B. Objectives

1. The agency revised its disability reasonable accommodation and personal assistance services procedures to comply with EEOC's regulations and guidance.
   Target Date: 09/30/2021
   Completion Date: 09/30/2021

2. Implement a new Reasonable Accommodation tracking system that is equipped to calculate processing time frames.
   Target Date: 06/30/2023
   Completion Date: 09/30/2023

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

- 2023: A new SharePoint data system was implemented in FY 2023 Q4, the Integrated Accommodation Management System (IAMS), which can calculate accommodation request processing times.

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.

- Leveraged collateral-duty SEPMs to conduct outreach and recruitment efforts with disability organizations and educational institutions and promoted and encouraged them to serve as recruiters for the Workforce Recruitment Program for College Students with Disabilities (WRP).

- Continued to develop, update, and widely distribute recruitment materials at each recruitment outreach event to promote the use of special hiring authorities for persons with disabilities.

- Encouraged hiring managers to use the Schedule A Hiring Authority prior to advertising positions and continued to refer disabled veterans' resumes to hiring managers to support veteran hiring goals.

- Utilized several non-paid work experience programs to include Operation Warfighter (OWF) that match qualified wounded, ill and injured service members with non-funded Federal internships, the VA Non-Paid Work Experience (NPWE) program that provides eligible veterans and service members with training and practical job experience, and the DoD SkillBridge Program encouraging service members to capitalize on training and development opportunities throughout their military career so they may grow and develop as professionals.

- Continued to recruit at diversity-focused career fairs, maintained rapport with local colleges and universities, collaborated with military installations, veterans' groups, and community organizations.

- Promoted the WRP in OEOI's Monthly Newsletter, SEPM training, and meetings with program offices and directorates.

FY 2024 Plans

- Partner with employee associations to enhance branding/marketing reach to underserved communities including persons with disabilities.

- Conduct outreach and employment related events to persons with disabilities to ensure the agency is meeting the established hiring goals.

- Conduct analysis on Schedule A conversions to limit untimely conversions.

- Update the resources on the Inclusive Recruitment and Hiring Hub, for example, "How to use the Hub" video, and additional marketing is planned.

- Maintain outreach contacts with local departments of veteran affairs, vocational rehabilitation offices, local disabled veteran organizations, Warrior Transition Units, Operation Warfighter, and other organizations that represent and serve disabled veterans.

- Increase the use of the Workforce Recruitment Program by providing hiring managers, resource managers and others involved in the hiring/recruiting process the link to the program and instructions on how register as an employer to view resumes.

- Expand long standing partnership with the Virginia Department for the Blind and Vision Impaired (DBVI) and Virginia Department of Aging and Rehabilitative Services (DARS) and promote and solicit program offices to participate in DBVI and DARS Weekly Club Meetings.

- Create a disability article that highlights the disability partnerships, disability hiring goals, and other disability related information.

2. Pursuant to 29 C.F.R. §1614.203(a)(3), describe the agency's use of hiring authorities that take disability into account (e.g., Schedule A) to recruit PWD and PWTD for positions in the permanent workforce.

- USCIS utilizes all available hiring authorities to recruit and hire PWD and PWTD, including Schedule A and the 30% or more disabled veteran's appointment authority USCIS continued exceeding the 10% DHS goal for hiring veterans. As of the end of the Fiscal Year, veterans occupied 25.0% of the workforce of which 17.1% were disabled veterans. There were 110 individuals hired using Schedule A during FY 2022 and 224 in FY 2023, a 103 64% increase.

- Utilized delegated examining unit job announcements to allow managers to recruit from all sources, which created larger applicant pools to reach disabled veterans, Schedule A eligible, and other best qualified candidates.

- Developed and launched an Inclusive Recruitment and Hiring Hub that assists hiring officials and senior leaders with recruitment and hiring resources such as use of Schedule A and other special hiring authorities.

- Created and distributed resources to hiring officials and potential candidates on special hiring authorities and DEIA initiatives.

- Conducted 17 recruitment and outreach activities for individuals with disabilities, including virtual events, webinars, panel talks, and information sessions on employment with USCIS.

- Continued to use the Schedule A Hiring Mailbox to advise eligible applicants about how to apply.

- Continued to encourage applicants to voluntarily self-identify if they have the types of disabilities covered by the programs via job announcements, job fairs, and hiring events.

3. When individuals apply for a position under a hiring authority that takes disability into account (e.g., Schedule A), explain how the agency (1) determines if the individual is eligible for appointment under such authority; and, (2) forwards the individual's application to the relevant hiring officials with an explanation of how and when the individual may be appointed.

Applicants eligible under special hiring authorities can:

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

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

  - Applications accepted through job announcements are referred on a certificate of 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 the Disability Program Manager, Selective Placement Program Coordinator, or hiring event. Selections are made through direct communication between the hiring office and their HR Specialist.

  - Selectees are entered into the onboarding process in the applicant tracking system as non-competitive selections. Disability identification is obtained prior to entrance on duty (EOD), which is the first point in the process where we will collect information on the type of disability (including if it is a targeted disability).

- The Veterans Employment Program Manager (VEPM) partnered with DHS and local military installations to provide employment workshops to transitioning service members and disabled veterans.

- In addition, USCIS also promoted non-paid work experience programs.

- The Selective Placement Program Coordinator partnered with Workforce Recruitment Program (WRP) Recruiter Program, the State and Federal Vocational Rehabilitation Programs, and DHS to provide individuals with disabilities more opportunities to prepare for, find, and maintain a job.

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

<div align="center">Answer   Yes</div>

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
  - Diversity Panel Discussion for USCIS Asylum Division Hiring Managers and Supervisors
  - Training modules: DEIA: Silence is Not an Option and DEIA: Taking the Mystery Out of Hiring

- o Career Development Programs that include DEIA content.
- The following additional ad hoc training is provided:
  - o Training on the Schedule A hiring authority upon request.
  - o HR Specialists provide hiring managers with an overview of the special hiring authorities as a regular part of their staffing and recruitment efforts.
  - o HCT and OEOI conduct training sessions in person and through webinars on non-competitive hiring authorities for hiring managers.
  - o HCT and OEOI collaborate to provide Leadership Lessons Series module on Recruiting, Hiring and Retaining Persons with Disabilities, Managing Diversity and Inclusion, and Leveraging Diversity and Inclusion.
  - o HR Specialists monthly provide supervisors with lists of all excepted service employees, including Schedule A hires, who are eligible to convert to a competitive, permanent position.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

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

- The Veterans Employment Program Manager (VEPM) partnered with DHS and local military installations to provide employment workshops to transitioning service members and disabled veterans. In addition, USCIS also promoted non-paid work experience programs.

- The Selective Placement Program Coordinator partnered with Workforce Recruitment Program (WRP) Recruiter Program, the State and Federal Vocational Rehabilitation Programs, and DHS to provide individuals with disabilities more opportunities to prepare for, find, and maintain a job.

C. PROGRESSION TOWARDS GOALS (RECRUITMENT AND HIRING)

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

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

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

New Hires	Total (#)	Reportable Disability Permanent Workforce (%)	Reportable Disability Temporary Workforce (%)	Targeted Disability Permanent Workforce (%)	Targeted Disability Temporary Workforce (%)
% of Total Applicants	50717	2.68	0.00	1.18	0.0
% of Qualified Applicants	43428	2.79	0.00	1.22	0.0
% of New Hires	3494	3.41	0.00	1.75	0.0

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

       a.New Hires for MCO (PWD)   Answer No

       b.New Hires for MCO (PWTD)   Answer Yes

A review of Table B6-1 New Hires by MCO was conducted. AFD was derived from USA Staffing and 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 MCO 2210, a trigger was identified when comparing the qualified applicant pool for PWTD (0.90%) to the selection rate of 0.00%.

New Hires to Mission-Critical Occupations	Total #	Reportable Disability New Hires	Targetable Disability New Hires
NUMERICAL GOAL	*	12%	2%
0301 MISCELLANEOUS ADMINISTRATION	98	4.08	3.06
0343 MANAGEMENT AND PROGRAM ANALYST	15	13.33	13.33
0930 REFUGEE AND ASYLUM OFFICER	526	3.99	2.28
1801 IMMIGRATION SERVICES OFFICER	1798	3.28	1.56
1802 IMMIGRATION SERVICES OFFICER	1019	3.14	1.57
2210 INFORMATION TECHNOLOGY SPECIALIST	38	2.63	0.00

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

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

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

Relevant applicant pool data is not available. Qualifications are not adjudicated until an applicant applies for a

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

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

    a.Promotions for MCO (PWD)   Answer Yes

    b.Promotions for MCO (PWTD)   Answer Yes

A review of Table B6-1 Internal Competitive Promotions by MCO was conducted. AFD was derived from USA Staffing and 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 (2.74%) to their selection rate of 2.18%.

- 0343: A trigger was identified when comparing the qualified applicant pool for PWDs (2.50%) to their selection rate of 2.45% A trigger was identified when comparing the qualified applicant pool for PWTDs (1.07%) to their selection rate of 0.92%.

- 1802: A trigger was identified when comparing the qualified applicant pool for PWDs (4.33%) to their selection rate of 1.95% A trigger was identified when comparing the qualified applicant pool for PWTDs (3.07%) to their selection rate of 1.17%.

- 0930: A trigger was identified when comparing the qualified applicant pool for PWDs (1.26%) to their selection rate of 0.00% A trigger was identified when comparing the qualified applicant pool for PWTDs (0 32%) to their selection rate of 0.00%.

- 2210: A trigger was identified when comparing the qualified applicant pool for PWDs (2.65%) to their selection rate of 0.00% A trigger was identified when comparing the qualified applicant pool for PWTDs (1.33%) to their selection rate of 0.00%.

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 2023, the agency continued to engage in initiatives designed to ensure employees with disabilities and employees with targeted disabilities had sufficient advancement opportunities through:

- Internal merit promotion procedures; career ladder and upward mobility positions; and training and career development programs.

- All employees, including veterans and PWD/PWTD, are encouraged to participate in the variety of internal development programs and training opportunities that are advertised on the HCT website and in USCIS broadcast messages.

- USCIS promoted its mentoring programs for employees and for supervisors with less than two years of experience.

- USCIS continued to demonstrate agency commitment and dedication to employees' growth via webinars and training events. For instance: "Developing a Plan to Further Your Career," "Learn About the Aspiring Leaders Program," "Learn About the USCIS Coaching Program," etc. These webinars and trainings helped to build new skills and cultivate employees' professional development.

B. CAREER DEVELOPMENT OPPORTUNITES

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

- Advanced Supervisory Development (ASD) (supervisors)
- Leadership Education and Development (LEAD) Programs (GS-4-SES)
- Career Coaching Program (non-supervisory GS-9 -12)
- Coaching to Lead (supervisors through GS-15)
- Emerging Leaders Course (non-supervisory GS 12 – 14)
- LinkUp@USCIS
- Mentoring program for (supervisors and non-supervisors (GS-5-15))
- Peer Networking program
- USCIS Aspiring Leaders Program (ALP)(GS-4-12)
- Fundamentals of Mission Support Training (FMST) (GS-4-13)
- Workforce Development Program
- Pathways programs that include Internship, Recent Graduate, and
- Presidential Management Fellows

Two new Career Development Programs are: Linkup@USCIS, a job exploration and information sharing

program, and Workforce Development Program, a skill- building program via standalone workshop sessions. Of the programs identified, only the LEAD program involves a panel-based selection process.

All programs require supervisor approval.

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

Career Development Opportunities	Total Participant Applicants (#)	Total Participant Selectees (#)	PWD Applicants (%)	PWD Selectees (%)	PWTD Applicants (%)	PWTD Selectees (%)
Coaching Programs	308	306	TBD	TBD	TBD	TBD
Mentoring Programs	351	339	TBD	TBD	TBD	TBD
Training Programs	433	319	TBD	TBD	TBD	TBD
Internship Programs	0	100	TBD	TBD	TBD	TBD
Other Career Development Programs	369	312	TBD	TBD	TBD	TBD
Detail Programs	0	0	0	0	0	0

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

       a. Applicants (PWD)   Answer N/A

       b. Selections (PWD)   Answer N/A

NOTE FOR #2: TBD is due to analytics staffing shortage. The agency was unable to complete this analysis in FY 2023. In FY 2024 the analysis will be completed when positions are expected to be staffed.

NOTE FOR #3: USCIS does not collect demographic data and detailed AFD for the career development programs identified above. USCIS will continue to work with DHS and/or OPM to acquire access to AFD as identified in the planned activities. Data will exclude program participants who cannot be identified in NFC.

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

       a. Applicants (PWTD)   Answer N/A

       b. Selections (PWTD)   Answer N/A

See the note in #3 above.

C. AWARDS

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

  a. Awards, Bonuses, & Incentives (PWD)   Answer Yes

  b. Awards, Bonuses, & Incentives (PWTD)   Answer Yes

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 1-10 hours: for PWD is 78.83% and for PWTD is 77.80%. Both are below the benchmark of 83.83%.
- Time off Awards 21-30 hours: for PWTD is 14.30% and for PWTD is 15.95%. Both are below the benchmark of 17.32%.
- Cash Awards $1000-$1999: for PWD is 22 40% and for PWTD is 19.74%. Both are below the benchmark of 23.05%.
- Cash Awards $2000-$2999: for PWD is 18.55% and for PWTD is 17.11%. Both are below the benchmark of 19.36%.
- Cash Awards $3000-$3999: for PWD is 12.22% and for PWTD is 12.01%. Both are below the benchmark of 14.28%.
- Cash Awards $4000-$4999: for PWD is 7.63% and for PWTD is 7.24%. Both are below the benchmark of 11.15%.
- Cash Awards $5000 or more: for PWD is 3.23% and for PWTD is 3.13%. Both are below the benchmark of 7.51%.

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

  a. Pay Increases (PWD)   Answer Yes

  b. Pay Increases (PWTD)   Answer Yes

QSI Award for PWD is 1.02% and for PWTD is 0.66%. Both are below the benchmark of 1.34%. Performance Based Pay Increase for PWD is 0.17% and for PWTD is 0.16%. Both are below the benchmark of 0.38%.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	64	0.17	0.38	0.16	0.17

3. If the agency has other types of employee recognition programs, are PWD and/or PWTD recognized disproportionately less than employees without disabilities? (The appropriate benchmark is the inclusion rate.) If "yes", describe the employee recognition program and relevant data in the text box.

> a. Other Types of Recognition (PWD)   Answer Yes
>
> b. Other Types of Recognition (PWTD)   Answer Yes

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

D. PROMOTIONS

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

> a. SES
>
> > i. Qualified Internal Applicants (PWD)   Answer   N/A
> >
> > ii. Internal Selections (PWD)   Answer   No
>
> b. Grade GS-15
>
> > i. Qualified Internal Applicants (PWD)   Answer   N/A
> >
> > ii. Internal Selections (PWD)   Answer   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

A review of Table B7-1 Internal Competitive Promotions in Senior Grade Levels was conducted. AFD was derived from USA Staffing and Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following grades for PWDs when comparing the qualified applicant pool to the number of selections for promotions:

- GS-15: A trigger was identified when comparing the qualified applicant pool for PWDs (1.83%) to their selection rate (0.00%).

- GS-14: A trigger was identified when comparing the qualified applicant pool for PWDs (2.55%) to their selection rate (1.53%).

- GS-13: A trigger was identified when comparing the qualified applicant pool for PWDs (2.34%) to their selection rate (1.87%).

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

    a. SES

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

        ii. Internal Selections (PWTD)   Answer No

    b. Grade GS-15

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

        ii. Internal Selections (PWTD)   Answer Yes

    c. Grade GS-14

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

        ii. Internal Selections (PWTD)   Answer Yes

    d. Grade GS-13

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

A review of Table B7-1 Internal Competitive Promotions in Senior Grade Levels was conducted. AFD was derived from USA Staffing and Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following grades for PWTDs when comparing the qualified applicant pool to the number of selections for promotions:

- GS-15: A trigger was identified when comparing the qualified applicant pool for PWTDs (0.85%) to their selection rate (0.00%).
- GS-14: A trigger was identified when comparing the qualified applicant pool for PWTDs (0.93%) to their selection rate (0.92%).
- GS-13: A trigger was identified when comparing the qualified applicant pool for PWTDs (0.95%) to their selection rate (0.83%).

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

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

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

c. New Hires to GS-14 (PWD)   Answer No

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

A review of Table B7-1 New Hires in Senior Grade Levels was conducted. AFD was derived from Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following grades for PWDs when comparing the qualified applicant pool to the number of selections for promotions:

- GS-15: A trigger was identified when comparing the qualified applicant pool for PWDs (1.76%) to their selection rate (0.00%).

- GS-13: A trigger was identified when comparing the qualified applicant pool for PWDs (4.26%) to their selection rate (1.49%).

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

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

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

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

A review of Table B7-1 New Hires in Senior Grade Levels was conducted. AFD was derived from USA Staffing and Monster and compared with the actual hires data from the National Finance Center via AXIS. Triggers exist for the following grades for PWDs when comparing the qualified applicant pool to the number of selections for promotions:
- GS-15: A trigger was identified when comparing the qualified applicant pool for PWDs (0.88%) to their selection rate (0.00%).
- GS-13: A trigger was identified when comparing the qualified applicant pool for PWDs (1.87%) to their selection rate (0.00%).

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

a. Executives

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

ii. Internal Selections (PWD)   Answer   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 Yes

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 (1.99%) to their promotion rate (0.00%).

- Managers: A trigger was identified when comparing the qualified internal applicants for PWDs (1.96%) to their promotion rate (1.54%).

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

    a. Executives

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

        ii. Internal Selections (PWTD)   Answer Yes

    b. Managers

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

        ii. Internal Selections (PWTD)   Answer Yes

    c. Supervisors

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

        ii. Internal Selections (PWTD)   Answer No

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 (0.83%) to their promotion rate (0.00%).

- Managers: A trigger was identified when comparing the qualified internal applicants for PWTDs (0.54%) to their promotion rate (0.44%).

6. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWD among the selectees for new hires to supervisory positions? If "yes", describe the trigger(s) in the

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

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

Based on Table B8-1: Triggers were identified for New Hire selectees of PWDs to supervisory positions when comparing the rate of selections to the percentage of qualified applicants by supervisory position.

- Executives: A trigger was identified when comparing the qualified internal applicants for PWDs (1.77%) to their selection rate (0.00%).

- Managers: A trigger was identified when comparing the qualified internal applicants for PWDs (3.70%) to their selection rate (0.00%).

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

a. New Hires for Executives (PWTD)	Answer	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 Hire selectees of PWTDs to supervisory positions when comparing the rate of selections to the percentage of qualified applicants by supervisory position.

- Executives: A trigger was identified when comparing the qualified internal applicants for PWTDs (0.88%) to their selection rate (0.00%).

- Managers: A trigger was identified when comparing the qualified internal applicants for PWTDs (1.82%) to their selection rate (0.00%).

Section VI: Plan to Improve Retention of Persons with Disabilities

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

A. VOLUNTARY AND INVOLUNTARY SEPARATIONS

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

Answer	No

USCIS tracks individuals who are on an excepted service appointment including those on a Schedule A appointment and provides reports to offices advising when a person is eligible for conversion to a competitive service appointment. Managers are responsible for conversion or any further action OEOI and HCT will review FY 2023 Schedule A eligible non-conversions to analyze reasons for non-conversions in FY 2023, will continue to closely monitor the progress of Schedule A separations and conversions, and is implementing an action plan to resolve the discrepancies. In FY 2023, USCIS converted 13 Schedule A employees out of 23 (56.52%) who were eligible. This is a decrease of 25.59% compared with FY 2022. Of those converted:

- Four (30.77%) were converted to career/career-conditional appointments before 24 months.

- Ten (43.48%) were eligible but not converted (an increase of 35% from FY 2022).

- There were zero separations before conversion, a decrease from the one (1.39%) separation before conversion in FY 2022. During FY 2023, USCIS had five total separations (2.23%).

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 (4.27%) to the PWODs inclusion rate (3.08%). The PWD rate decreased 1.07% from FY 2022.
- Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWDs (2.66%) to the PWODs inclusion rate (1.75%). The PWD rate decreased 0.49% from FY 2022.

NOTE: For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	124	0.75	0.55
Permanent Workforce: Resignation	356	2.34	1.51
Permanent Workforce: Retirement	342	1.89	1.58
Permanent Workforce: Other Separations	298	1.89	1.29

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

   a. Voluntary Separations (PWTD)   Answer   Yes

   b. Involuntary Separations (PWTD)   Answer   Yes

Table B-1 was reviewed. PWTDs in the permanent workforce are exceeding the inclusion rate benchmark for voluntary and involuntary separations.

- Voluntary Separations: A trigger was identified when comparing the inclusion rate for PWTDs (6.09%) to

the PWODs inclusion rate (3.08%). The PWTD rate increased 1.20% from FY 2022.

- Involuntary Separations: A trigger was identified when comparing the inclusion rate for PWTDs (3.45%) to the PWODs inclusion rate (1.75%). The PWD rate decreased 0.35% from FY 2022. NOTE: For reporting purposes, resignations and retirements are counted as voluntary separations. Reductions in force, removal, and other separations are counted as involuntary separations.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	124	1.30	0.58
Permanent Workforce: Resignation	356	3.91	1.66
Permanent Workforce: Retirement	342	2.12	1.64
Permanent Workforce: Other Separations	298	2.12	1.42
Permanent Workforce: Total Separations	1120	9.45	5.31

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.

NOTE: USCIS was unable to complete the analysis of exit survey data in FY 2023 because the agency lacked an exit survey mechanism. This issue has been addressed and USCIS will conduct an analysis in FY 2024.

B. ACCESSIBILITY OF TECHNOLOGY AND FACILITIES

Pursuant to 29 CFR §1614.203(d)(4), federal agencies are required to inform applicants and employees of their rights under Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. § 794(b), concerning the accessibility of agency technology, and the Architectural Barriers Act of 1968 (42 U.S.C. § 4151-4157), concerning the accessibility of agency facilities. In addition, agencies are required to inform individuals where to file complaints if other agencies are responsible for a violation.

1. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under Section 508 of the Rehabilitation Act, including a description of how to file a complaint.

The public website notice of Section 508 accessibility is located at: https://www.uscis.gov/website-policies/accessibility. The internal website also has a notice of Section 508 accessibility and provides a help desk number and email for employees with issues of accessibility.

2. Please provide the internet address on the agency's public website for its notice explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

The notice is located at: https://www.uscis.gov/website-policies/accessibility.

3. Describe any programs, policies, or practices that the agency has undertaken, or plans on undertaking over the next fiscal year, designed to improve accessibility of agency facilities and/or technology.

USCIS continues to improve accessibility to its facilities. In FY 2023, USCIS installed automatic door openers in 12

additional locations: El Paso Field Office, Long Island Field Office and Applicant Service Center (ASC), Texas Service Center, Reno Field Office and ASC, Central NJ Field Office, Baltimore District Office, Seattle District Office and ASC, Boise Field Office and ASC, New Orleans District Office and ASC, Las Vegas Field Office and ASC, San Fernando Field Office, and Syracuse Field Support Office and ASC. Additional sites will be retrofitted with automatic door openers in fiscal years 2024 and 2025, or as offices relocate.

C. REASONABLE ACCOMMODATION PROGRAM

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

1. Please provide the average time frame for processing initial requests for reasonable accommodations during the reporting period. (Please do not include previously approved requests with repetitive accommodations, such as interpreting services.)

This information is not available for FY 2023 because the DHS-operated system used for tracking requests for reasonable accommodation was updated in FY 2019 and, as a result, reporting capabilities have been negatively impacted. USCIS identified and commenced work on an alternative system with the ability to provide accurate data regarding processing time for reasonable accommodation. The system was completed 9/30/2023.

2. Describe the effectiveness of the policies, procedures, or practices to implement the agency's reasonable accommodation program. Some examples of an effective program include timely processing requests, timely providing approved accommodations, conducting training for managers and supervisors, and monitoring accommodation requests for trends.

- In FY 2023, OEOI received 1933 requests for reasonable accommodation resulting in a 233% increase over FY 2022. This included, but was not limited to, requests for telework/remote work, job duty modification, schedule change, assistive technology such as hardware/software, ergonomic chairs, and sign language interpreters.

- USCIS continued the best practice of utilizing a central accommodation fund which provided $3,000,000 in funding for reasonable accommodation requests in FY 2023.

- USCIS trained 618 supervisors and 489 non-supervisory employees on the reasonable accommodation process during FY 2023 with a total of 13 sessions held.

- USCIS continued to provide captioning and remote sign language interpreters for meetings and trainings.

- USCIS streamlined the approval and provisioning of accommodation software to provide a more efficient and expedited process for employees with disabilities.

- USCIS gained approval and allocated funding for an updated reasonable accommodation tracking system.

- Reasonable accommodation and personal assistance services procedures were approved by the EEOC in April 2023.

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

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

USCIS personal assistance services requests are handled through the agency's reasonable accommodation procedures. The updated management directive on Disability Accommodation and Personal Assistance Services for Employees and Job Applications (MD256-006) were submitted to the EEOC and approved on April 21, 2023.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer   Yes

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

Answer   Yes

3. If the agency had one or more findings of discrimination alleging harassment based on disability status during the last fiscal year, please describe the corrective measures taken by the agency.

- In response to question one, PWDs alleged harassment in 30 out of 110 formal complaints (27%), which is higher than the government-wide average of 23.12% and slightly higher than the FY 2022 rate of 26.92%.

- In response to question two, there were seven settlement agreements and one finding of discrimination.

- Corrective Measures include $150,000 compensatory damages, re- instatement, back-pay from Complainant's termination date through the date Complainant is re-employed, retroactive tax-deferred contributions to TSP, $99,797.92 reimbursement of medical bills, four hours of in-person training for leadership, consideration of disciplinary action of RMOs, $58,912.50 in attorney's fees, and expungement of negative information in eOPF.

- Section VI.A.3 and B.3 refer to the same case. There were 3 separate accepted issues: the harassment issue, the RA denial, and a termination during probationary period.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

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

Answer   Yes

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

Answer   Yes

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

- In response to question one, PWDs alleged harassment in 26 out of the 110 formal complaints (24%), which is higher than the government-wide average (13.79%).

- In response to question two, there were ten settlement agreements and one finding of discrimination.

- Corrective Measures include $150,000 compensatory damages, re-instatement, back-pay from Complainant's termination date through the date Complainant is re-employed, retroactive tax-deferred contributions to TSP, $99,797.92 reimbursement of medical bills, four hours of in-person training for leadership, consideration of disciplinary action of RMOs, $58,912.50 in attorney's fees, and expungement of negative information in eOPF.

- Section VI. A.3 and B.3 refer to the same case. There were 3 separate accepted issues: the harassment issue, the RA denial, and a termination during probationary period.

Section VIII: Identification and Removal of Barriers

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

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

Answer   No

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

Answer   Yes

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

A. TRIGGER ONE

- **Source of the Trigger:** Workforce Data

- **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 new hires and promotions for MCOs, in senior grades, and for supervisory positions.

- **STATEMENT OF BARRIER GROUPS:** People with Disabilities, People with Targeted Disabilities

- **Barrier Analysis Process Completed?** No

- **Barrier(s) Identified?** No

- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger One

Date Initiated	Target Date	Sufficient Funding & Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2018	Yes	09/30/2024		Examine the reason for the trigger.

Responsible Officials

Title	Name	Standards Address The Plan?
Branch Chief, HROC, Human Capital and Training (HCT)	Robyn Logsdon	No
Division Chief, Complaints Resolution Division, OEOI	Rebecca Arsenault-Herize	No
Supv. Equal Employment Specialist, Diversity and Inclusion Division, OEOI	Morenike Ogebe	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	1. OEOI and HCT will partner to identify and implement strategies to increase recruitment of PWTD.	Yes		09/30/2018
09/30/2018	2. OEOI will monitor applicant data of PWTD in major occupations to identify trends.	Yes		09/30/2018
09/30/2018	3. OEOI will develop a Quick Reference Guide for Disability hiring for managers. (Now activity 1-1)	Yes	09/30/2022	09/30/2021
09/30/2018	4. OEOI will develop and conduct a pilot program to identify entry level and promotional opportunities for PWDs. (Now activity 2-1).	Yes	09/30/2024	
09/30/2018	5. OEOI will collaborate with HCT to develop the annual Coordinated Recruitment and Outreach Plan (CROP).	Yes		09/30/2018
09/30/2019	7. OEOI and HCT will collaborate to develop a plan to review policies, practices and procedures related to promotion. (Now activity 5-1).	Yes	09/30/2024	
09/30/2020	8. OEOI and HCT will review and analyze results of the Merit Promotion study. (Now activity 6-1 and 3-2).	Yes	09/30/2024	
09/30/2020	9. OEOI and HCT will work with DHS CRCL to access AFD by disability to effectively analyze percent of qualified candidates for promotions as required by MD-715. (Now activity 7-1).	Yes	09/30/2024	
09/30/2021	10. OEOI will develop a disability demographic snapshot and distribute to HCT and senior leadership. (Now activity 8-1).	Yes	12/31/2023	
09/30/2019	6. OEOI and HCT will collaborate to monitor and review promotions and identify trends. (Now activity 3-1).	Yes	09/30/2020	09/30/2020
09/30/2020	4-1 OEOI and HCT will collaborate to review merit promotion data for indications of triggers/barriers.	Yes	09/30/2024	

Report of Accomplishments

2018: The statement of the trigger and objective was modified. In comparison with the qualified applicant pool, a trigger no longer exists for PWTD among new hires for the Management Program Analyst Mission Critical Occupation (0343). However, new triggers exist for PWTDs among employees promoted to the 1801, 0301, 0343, and 1802 MCOs and for new hires and/or promotions to the higher grades and supervisory positions.

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

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

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

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

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

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

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

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

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).

2021: 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.

2022: Activities 1-1 to 8-1

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

Activities 1-6

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

Activities 2-1

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

Activities 4-1

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

Activities 5-1

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

Activities 7-1

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

Activities 8-1

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

DEIA plan.

2023: Activities 1-1 to 8-1

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

Activity 1-6

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

Activity 2-1

The HROC STAR Branch has included DEIA efforts and ERI/S data in their ongoing discussions with hiring managers and recruitment/outreach efforts. During FY 2023 OEOI has drafted a DEIA plan.

Activity 4-1

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

Activity 5-1

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

Activity 7-1

During FY 2023 USCIS began to transition from MHME back to the USA Staffing platform. This will allow for readily accessible AFD for continued analysis. HCT conducted a validation study to measure the effectiveness of the predictive assessments used in the hiring process at USCIS. Based on the results of the study USCIS also paused the use of the use of predictive assessment in most positions.

Activity 8-1

OEOI continued to prepare an annual demographic snapshot that is posted on its internal site. OEOI and HCT continued to develop an HR dashboard that includes real-time ERI/S workforce data in Tableau. The HROC STAR Branch has included DEIA efforts and ERI/S data in their ongoing discussions with hiring managers.

B. TRIGGER TWO

- **Source of the Trigger:** Workforce Data
- **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.
- **STATEMENT OF BARRIER GROUPS:** People with Disabilities, People with Targeted Disabilities
- **Barrier Analysis Process Completed?** No
- **Barrier(s) Identified?** No
- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger Two

Date Initiated	Target Date	Sufficient Funding & Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2018	Yes	09/30/2024		Examine the trigger to determine the reasons why PWD and PWTD are separating from the agency at higher rates than persons without disabilities or targeted disabilities.

Responsible Officials

Title	Name	Standards Address The Plan?
Supv. Equal Employment Specialist, Diversity and Inclusion Division, OEOI	Morenike Ogebe	No
Branch Chief, Human Resources Operations Center, HCT	Robyn Logsdon	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	1. OEOI and HCT will partner to identify and implement strategies to increase retention of PWD.	Yes		09/30/2018
09/30/2018	2. OEOI will monitor separation data of PWD to identify trends.	Yes		09/30/2018
09/30/2018	3. OEOI will monitor exit survey results for separation trends of PWD.	Yes		09/30/2018
09/30/2018	4. OEOI will review tracking of ERIG and disability in career development programs.	Yes		09/30/2018
09/30/2018	5. OEOI will conduct the third bi-annual EEO Climate Survey.	Yes		09/30/2018
09/30/2019	6. OEOI and HCT will continue to partner with DHS and OPM to develop best practices to access and track AFD for internal promotions. (Now activity 1-2)	Yes	12/31/2023	09/30/2022
09/30/2019	7. OEOI and HCT will collaborate to conduct a review of merit promotions for indications of barriers. (Now activity 2-2).	Yes	09/30/2024	
03/31/2021	8. OEOI and HCT will collaborate to review and analyze results of merit promotions study. (Now activities 6-1 and 3-2).	Yes	09/30/2024	
09/30/2019	9. OEOI will analyze Climate survey results for retention data on PWD/PWTD.	Yes		09/30/2019
09/30/2020	10. OEOI will administer fourth EEO and Diversity Climate Survey with questions focused on PWD/PWTD triggers. (Now activity 4-2).	Yes	07/14/2021	07/14/2021
09/30/2020	5-2 OEOI will analyze Climate Survey results.	Yes	09/30/2022	09/30/2023

Report of Accomplishments

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

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

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

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

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

Planned Activity 7: HCT & OEOI are reviewing an outline of the Merit Promotion Program Review Plan which will take placed in FY2019. HCT is establishing a review working group including a staffing team, data analysis team, training team, Labor and Employee Relations, and payroll team, who will contribute to the final plan.

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.

2020: Modifications: Activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. Former activity 8 was also added to trigger 1 (activity 6-1 and 3-2). Dates were extended to allow reasonable time to accomplish objectives. Former OEOI continued to partner with HCT to identify and implement strategies to increase retention of PWDs such as: monitoring separation data like exit survey data for trends and reviewing participation of PWDs in career development programs.

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.

2022: Activities 1-2

• USCIS is anticipating access to more AFD data as the Agency is transferring systems from MHME to USA Staffing. OEOI manually tracks career development programs and cross maps applicant data with demographics using information from HCT. Working group formed with HCT for merit promotion review.
Activities 2-2

• Formed monthly OEOI-HCT DEIA working group in the TEAMS platform for document sharing.
Activities 5-2

OEOI briefed agency senior leadership on the results of the FY 2021 EEO and Diversity Climate Survey on May 5, 2022, and results were distributed to Program Offices and Directorates.

2023: Activity 1-2

USCIS is anticipating access to more AFD data as the agency is transferring systems from MHME to USA Staffing. OEOI manually tracks career development programs and cross maps applicant data with demographics using information from HCT.
Activity 2-2

Formed monthly OEOI-HCT DEIA working group in Teams for document sharing.
Activity 5-2

OEOI briefed agency senior leadership on the results of the FY 2021 EEO and Diversity Climate Survey on May 5, 2023, and results were distributed to Program Offices and Directorates. Further analysis was conducted and briefed to PODS during EEO and DEIA POD assessments. A new climate survey is planned for 2024.

C. TRIGGER THREE
- **Source of the Trigger:** EEO Complaints
- **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.
- **STATEMENT OF BARRIER GROUPS:** People with Disabilities
- **Barrier Analysis Process Completed?** No
- **Barrier(s) Identified?** No
- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger Three

Date Initiated	Target Date	Sufficient Funding & Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2019	Yes	09/30/2021		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 Officials

Title	Name	Standards Address The Plan?
Supv. Equal Employment Opportunity Specialist, Disability Accommodations Program, OEOI	Sandra Sutton	No
Division Chief, Complaints Resolution, OEOI	Rebecca Arsenault-Herize	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	1. OEOI will review and monitor harassment and reasonable accommodation complaints by PWD and identify trends.	Yes	09/30/2020	09/30/2020
03/31/2018	2. OEOI will issue a new EEO policy statement with strong language on anti-harassment.	Yes		12/13/2019
09/30/2019	3. OEOI will review the reasonable accommodations process and identify opportunities for efficiencies.	Yes	09/30/2020	09/30/2020
09/30/2018	4. OEOI will identify and implement ways to educate managers on prevention of harassment, discrimination, and reprisal.	Yes		09/11/2018
09/30/2018	5. OEOI will create and implement an Anti-Bullying initiative. (Now activity 2-3)	Yes	09/30/2020	09/30/2020
09/30/2020	1-3. OEOI will issue a new EEO policy statement with strong language on anti-harassment.	Yes	09/30/2021	09/30/2021

Report of Accomplishments

2018: Modification: The statement of the trigger has been modified to reflect a change in FY 2017 462 Report data on the government wide averages for harassment complaints and failure to accommodate complaints by PWD which changed from 14.23% to 18.05% and from 9.74% to 12.50%, respectively.

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

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

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

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

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

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.

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:

    ο   Collected trend data on complaints. Plans were discussed to convene a working group to exchange data on reasonable accommodation complaints and EEO trends.

    ο   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.

    ο   HCT offered anti-bullying training to all employees.

2021: Accomplishments X-3

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

2022: Activities identified are ongoing.

2023: Activities are ongoing.

D. TRIGGER FOUR
- **Source of the Trigger:** Workforce Data
- **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.
- **STATEMENT OF BARRIER GROUPS:** People with Disabilities, People with Targeted Disabilities
- **Barrier Analysis Process Completed?** No
- **Barrier(s) Identified?** No
- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger Four

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

Responsible Officials

Title	Name	Standards Address The Plan?
Branch Chief, HROC, HCT	Robyn Logsdon	No
Supervisory EEO Specialist, Disability Accommodations Program, OEOI	Sandra Sutton	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	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).	Yes	09/30/2024	
09/30/2019	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).	Yes	09/30/2024	
09/30/2021	4. OEOI and HCT will collaborate with DHS CRCL/ OCHCO to review and develop best practices in recognition and awards policies and procedures and determine next steps. (Now activity 3-4).	Yes	09/30/2025	

Report of Accomplishments

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

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.

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).

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.

2022: Activities 1-4, 2-4 and 3-4 - USCIS will continue to collect and monitor MD-715 awards and compensation data. Ongoing discussions about creating performance award policies will be held.

As USCIS continues to collect data on time off awards, cash awards, and QSIs and will partner with DHS CRCL/OCHCO to develop best practices.

2023: Activities 1-4, 2-4, and 3-4 - Activities to address this trigger are ongoing.

E. TRIGGER FIVE
- **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.
- **STATEMENT OF BARRIER GROUPS:** People with Disabilities, People with Targeted Disabilities
- **Barrier Analysis Process Completed?** No
- **Barrier(s) Identified?** No
- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger Five

Date Initiated	Target Date	Sufficient Funding & Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2018	Yes	12/31/2022		Examine the reason for the trigger and Increase conversion rates of eligible Schedule A employees into competitive service.

Responsible Officials

Title	Name	Standards Address The Plan?
Branch Chief, HROC, HCT	Robyn Logdon	No
Disability Accommodations Program, Supv. Equal Employment Specialist, OEOI	Sandra Sutton	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2018	1. OEOI and HCT will collaborate to monitor and review Schedule A conversions and identify trends.	Yes		09/30/2018
09/30/2018	2. HCT and OEOI will collaborate to review Schedule A processes and identify opportunities for efficiencies.	Yes		09/30/2018
09/30/2018	3. HCT and OEOI will review and analyze procedures and develop best practices for Schedule A eligible for conversion who are not converted. (Now activity 1-5).	Yes	12/31/2022	
09/30/2019	4. OEOI and HCT will collaborate to analyze specific cases of non-conversion to determine reasons and develop a plan to address discrepancies. (Former 3 & 4; Now activity 2-5)	Yes	09/30/2020	09/30/2020

Report of Accomplishments

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

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

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

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.

2020: Modifications: Most activities were delayed or put on hold due to potential administrative furlough events in Q3 and Q4. Activities were revised and renumbered to consolidate them. For example, activities 3 and 4 were combined. Dates were extended to allow reasonable time to accomplish objectives.

Activities: HCT and OEOI continued to collaborate to monitor and review Schedule A processes and conversions, identify trends and opportunities for efficiencies including:
- Conducted a review of the FY 2019 non-conversions and identified reasons for non-conversion.
- Discussed plan to address non-conversions. Will review and modify HCT procedure for notification by developing a manager's checklist, updating the HCT Connect page, and marketing the Schedule A program in HCT fora.

2021: Accomplishments: Activities X-5 - 1-5 date modified to allow time to achieve target.

2022: Activities 1-5 and 2-5 - DEIA Strategic Plan Goals 2 (Diversity) and 4 (Inclusion) align with these activities. Monthly reports are sent to hiring office staffing POCs for review and reminders. Non-timely conversions are reviewed by HCT to determine the cause of the delay. Data will continue to be collected and monitored.

2023: Activities 1-5 and 2-5 - DEIA Strategic Plan Goals 2 (Diversity) and 4 (Inclusion) align with these activities Monthly reports are sent to hiring office staffing POCs for review and reminders. Non-timely conversions are reviewed by HCT to determine the cause of the delay Data will continue to be collected and monitored.

G. TRIGGER SIX
- **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.
- **STATEMENT OF BARRIER GROUPS:** People with Disabilities, People with Targeted Disabilities
- **Barrier Analysis Process Completed?** No
- **Barrier(s) Identified?** No
- **STATEMENT OF IDENTIFIED BARRIER:** Barriers have not been identified.

Objective and Dates for EEO Plan for Trigger Six

Date Initiated	Target Date	Sufficient Funding & Staffing?	Date Modified	Date Completed	Objective Description
10/01/2017	09/30/2019	Yes	09/30/2024		Examine the trigger to determine the reasons for the underrepresentation of PWD and PWTD among applicants and selectees for career development programs.

Responsible Officials

Title	Name	Standards Address The Plan?
Supv. Equal Employment Specialist, Diversity and Inclusion Division, OEOI	Morenike Ogebe	No
Branch Chief, HROC, HCT	Robyn Logsdon	No

Planned Activities Toward Completion of Objective

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2019	1. OEOI will coordinate with HCT to benchmark and develop AFD framework for USCIS career development programs. (Now activity 1-6).	Yes	12/31/2024	
09/30/2020	2. OEOI will coordinate with HCT to review and analyze career development program policies and procedures. (Now activity 2-6).	Yes	09/30/2024	

Report of Accomplishments

2018: New trigger.

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.

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.

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

2022: Activities 1-6 and 2-6 - DEIA Strategic Plan Goal 3 (Equity) has strategies and activities on improved collection of career data and increased access to career development. Together with the activities in this plan, the quarterly/annual reporting will help ensure targets are met. HCT plans to conduct voluntary surveys at the end of the mentoring program that include questions that allow for self-identification of disability and other demographics.

2023: Activities 1-6 and 2-6 - Activities to address this issue are ongoing.

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

Some planned activities were completed, others are ongoing. FY 2023 enhancements were approved for the EEO and DEIA programs, these enhancements will assist with other barrier analysis in FY 2023.

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

NA

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

NA