

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 | Yes |

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce were Law Enforcement Officers (LEO), and 7,306 or 37% were non-Law Enforcement Officers (non-LEO). Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWD in the GS-11 to SES cluster was 10.13% in FY 2018, which falls below the benchmark. However, further analysis indicates that Law Enforcement Officers represent 30% of the ICE permanent workforce in the GS-11 to SES cluster, which includes a PWD representation of 2.2%. Non-Law Enforcement Officers represent 25% of the ICE permanent workforce in the GS-11 to SES cluster, which includes a PWD representation of 3%. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWD in the GS-1 to GS-10 cluster was 24.64% in FY 2018, which indicates that ICE does not have a trigger in the GS-1 to GS-10 cluster. However, further analysis indicates that Law Enforcement Officers represented 27% of the ICE permanent workforce in the GS-1 to GS-10 cluster, which includes a PWD representation of 6%. Non-Law Enforcement Officers represent 25% of the ICE permanent workforce in the GS-1 to GS-10 cluster, which includes a PWD representation of 3%. The physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD applicants, that adversely effects ICE's ability to reach the benchmark in regard to the GS-1 to GS-10 and the GS-11 to SES clusters within the permanent workforce.

*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 | Yes |

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce are Law Enforcement Officers (LEO), and 7,306 or 37% non-Law Enforcement Officers (non-LEO). Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWTD in the GS-11 to SES cluster was 0.89% in FY 2018, which falls below the benchmark. However, further analysis indicates that Law Enforcement Officers represent 30% of the ICE permanent workforce in the GS-11 to SES cluster, which includes a PWTD representation of 0.3%. Non-Law Enforcement Officers represent 25% of the ICE permanent workforce in the GS-11 to SES cluster, which includes a PWTD representation of 1%. Analysis of the permanent workforce data contained in Table B-4 indicates that the percentage of PWTD in the GS-1 to GS-10 cluster was 2.62%

in FY 2018, which indicates that ICE does not have a trigger in the GS-1 to GS-10 cluster. However, further analysis indicates that Law Enforcement Officers represented 27% of the ICE permanent workforce in the GS-1 to GS-10 cluster, which includes a PWD representation of 0.04%. Non-Law Enforcement Officers represent 25% of the ICE permanent workforce in the GS-1 to GS-10 cluster, which includes a PWD representation of 1%. The physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD applicants, that adversely effects ICE’s ability to reach the benchmark in regard to the GS-1 to GS-10 and the GS-11 to SES clusters within the permanent workforce.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	2451	604	24.64	65	2.65
Grades GS-11 to SES	17436	1767	10.13	155	0.89

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

Information regarding the numerical goals is shared with hiring officials, managers, and recruiters during the ICE Office of Human Capital training regarding special hiring authorities. The SEPM program provided training for 25 additional F-SEPM’s regarding the special hiring authorities, as well as the numerical goals. Additionally, EEO & Diversity Managers and Supervisors Update contains information regarding the numerical goals.

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 No

During FY 2018 the Disability program staff consisted of a Disability Program Manager and two Reasonable Accommodation Coordinators. During the year the team experienced multiple staffing changes which included, transitioning off the team, or transitioning to positions at other federal agencies. Although, the subsequent table provides the perception of sufficient staffing, as it lists six individuals processing requests, this is a false perception. The six individuals processing requests, included two collateral duty employees, whom joined the team in August 2018. Additionally, as you will note upon review of the table the ICE staff members responsible for implementing the agency’s disability program, full-time members of the Disability team and collateral duty employees participated on the team for varying amounts of time during the year. ODCR is providing additional training for all Disability Program team members. Training is being provided by the Disability Program Manager for a new reasonable accommodation coordinator. Additionally, team members are attending Excel, FDR, and EEOC Disability Program Manager (Basics) courses to bolster their knowledge and skills for processing reasonable accommodation requests. Furthermore, we are leveraging the current contractors to assist with data management, data analysis projects, submission of electronic purchase card transaction worksheets, submission of ITSR tickets, management of the reasonable accommodation mailbox and other projects in support of the Disability Program.

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

Disability Program Task	# of FTE Staff By Employment Status			Responsible Official (Name, Title, Office Email)
	Full Time	Part Time	Collateral Duty	
Processing applications from PWD and PWTB	2	0	0	Riza Takeda Office of Human resources Operations Center Team A – Staffing Branch Chief hrasstdro@ice.dhs.gov Ekron Tanwongprasert Office of human Resources Operations Center Team B – Acting Staffing Branch Chief DCS-HR-Staffing@ice.dhs.gov
Answering questions from the public about hiring authorities that take disability into account	2	0	0	Lynn Dickson, Disability Program Manager, Lynn.M.Dickson@ice.dhs.gov
Processing reasonable accommodation requests from applicants and employees	4	0	2	Lynn Dickson, Disability Program Manager June – September 2018 David Conner Reasonable Accommodation Coordinator October 2017 – August 2018 Merechia Davis Reasonable Accommodation Coordinator October 2017 – September 2018
Section 508 Compliance	1	0	0	Arva Parker, IT Specialist, ICE Section 508 Coordinator
Architectural Barriers Act Compliance	1	0	0	Lynn Dickson, Disability Program Manager
Special Emphasis Program for PWD and PWTB	1	0	0	Rita Bhanot, Special Emphasis Program Manager

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

Answer No

During FY 2019 The disability program staff will be attending the EEOC Disability Program Manager (Basics) course. The Disability Program manager will be attending EEOC’s 22nd Annual EXCEL Training Conference. Additionally, a reasonable accommodation coordinator will be attending the Federal Dispute Resolution (FDR) Training conference. Although, the disability program staff did not attend external trainings offered in FY 2018, the Disability Program Manager provided one-on-one training, and group training for full time and collateral duty RA Coordinators. Additionally, purchase Card training was provided by the ODCR purchase card holder for the full-time and collateral duty RA Coordinators.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer No

The ICE Central Accommodation Fund (CAF) established in FY16 remains in place and is sufficiently funded to meet the accommodation needs of ICE employees and applicants for employment. Additionally, the Disability Program receives support from our current contractors. The contractors assist with data management, data analysis projects, submission of electronic purchase card transaction worksheets, submission of ITSR tickets, management of the reasonable accommodation mailbox and other projects in support of the Disability Program.

Section III: Program Deficiencies In The Disability Program

Brief Description of Program Deficiency	A.2.b.3. Reasonable accommodation procedures? [see 29 CFR § 1614.203(d)(3)(i)] If so, please provide the internet address in the comments column.
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Brief Description of Program Deficiency	C.2.a.6. Do the agency’s training materials on its anti-harassment policy include examples of disability-based harassment? [see 29 CFR §1614.203(d)(2)]		
Objective	Develop training materials that include examples of harassment based on disability for both Manager/Supervisors and non-supervisory employees.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Dec 1, 2018		The Anti-Harassment Program Manager will meet with the Disability Program Manager to discuss disability-based harassment scenarios and training slides/data.
	Sep 30, 2019		Revise anti-harassment training to include disability-based harassment information and scenarios for Fiscal Year 2020.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	C.2.b.5. Does the agency process all initial accommodation requests, excluding ongoing interpretative services, within the time frame set forth in its reasonable accommodation procedures? [see MD-715, II(C)] If “no”, please provide the percentage of timely-processed requests, excluding ongoing interpretative services, in the comments column.		
Objective	Process reasonable accommodations requests within the time frame set forth in ICE reasonable accommodation procedures.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Sep 30, 2019		Provide updated plan to senior staff for consideration.
	Sep 30, 2019		Conduct research and bench marking with law enforcement entities and other Federal agencies to develop best practices and streamlining of strategies.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	C.2.c. Has the agency established procedures for processing requests for personal assistance services that comply with EEOC's regulations, enforcement guidance, and other applicable executive orders, guidance, and standards? [see 29 CFR §1614.203(d)(6)]		
Objective	Establish PAS procedures that comply with EEOC's regulations and enforcement guidance.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 28, 2018		The Disability Program Manager will draft the PAS procedures.
	Jun 28, 2018		Submit to the Chief Diversity Officer for review.
	Sep 2, 2018		Submit to ODCR's embedded Attorney for review.
	Oct 12, 2018		Post PAS FAQ's to ICE's public website. Additionally, PAS FAQ's are included in ICE-ODCR training for Managers and Supervisors.
	Aug 31, 2019		Submit draft procedures to DHS Office for Civil Rights and Civil Liberties and relevant ICE program offices for review.
	Sep 30, 2019		Submit final procedures to the EEOC for review and posting on the public website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	C.2.c.1. Does the agency post its procedures for processing requests for Personal Assistance Services on its public website? [see 29 CFR §1614.203(d)(5)(v)] If "yes", please provide the internet address in the comments column.		
Objective	Establish PAS procedures that comply with EEOC's regulations and enforcement guidance.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Jun 28, 2018		Submit to the Chief Diversity Officer for review.
	Jun 28, 2018		The Disability Program Manager will draft the PAS procedures.
	Sep 30, 2018		Submit to ODCR's embedded Attorney for review.
	Oct 12, 2018		Post PAS FAQ's to ICE's public website. Additionally, PAS FAQ's are included in ICE-ODCR training for Managers and Supervisors.
	Aug 31, 2019		Submit draft procedures to DHS Office for Civil Rights and Civil Liberties and relevant ICE program offices for review.
	Sep 30, 2019		Submit final procedures to the EEOC for review and posting on the public website.
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	D.1.c. Does the agency conduct exit interviews or surveys that include questions on how the agency could improve the recruitment, hiring, inclusion, retention and advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)(iii)(C)]		
Objective	Obtain information that aids ICE in creating strategies and tools to institute ways for agency to improve the recruitment, hiring, inclusion, retention and advancement of disabilities. Additionally, the Office of Diversity and Civil Rights (ODCR) is launching an educational campaign to encourage ICE employees to validate and/or update their disability status in their MyEPP profiles.		
Target Date	Sep 30, 2019		
Completion Date			
Planned Activities	<u>Target Date</u>	<u>Completion Date</u>	<u>Planned Activity</u>
	Oct 15, 2018		ODCR staff will draft information to be shared with all ICE employees which includes information regarding the re-survey, how the information is used, and the instructions for updating their information.
	Oct 22, 2018		An ICE Broadcast message will be sent out to all employees, providing information regarding the resurvey, and the steps for updating their information.
	Dec 1, 2018		ODCR will request a copy of the exit interview for review to ensure that questions regarding recruitment, hiring, inclusion, retention and advancement of individuals with disabilities are included.
	Jun 1, 2019		Schedule meeting with Office of Human Capital on a monthly basis to discuss possible tools to capture data on how agency can capture data related to individuals with disabilities.
	Sep 30, 2019		An ICE Broadcast message will be sent out to all employees, providing information regarding the resurvey, and the steps for updating their information. ONGOING
Accomplishments	<u>Fiscal Year</u>	<u>Accomplishment</u>	

Brief Description of Program Deficiency	E.4.b. Does the agency have a system in place to re-survey the workforce on a regular basis? [MD-715 Instructions, Sec. I]
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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.

The Selective Placement Program Coordinator (SPCC) conducts training on the Federal Hiring Process and assisting applicants with completing a federal resume at local Employment Centers, Military Installations and Rehabilitative Centers in the Washington DC metro area. The SPPC also coordinates with hiring managers to consider hiring noncompetitive applicants before announcing the job on usajobs.gov.

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

The Agency currently use the following authorities to hire persons with disabilities: 1.Schedule A for PWD and PWTD 2.Veterans with a 30% or greater disability rating 3.Wounded Warrior 4.Human Exploitation Rescue Operation (HERO) 5.Veterans’ Recruitment Appointment (VRA)

- 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.

Applications are submitted via USAJobs. The applicant can upload their Schedule A letter, and/or their Disabled Veteran documentation, to be considered under one of the special hiring authorities. The Office of Human Capital reviews the applicants resume to determine if they meet the minimum qualifications of the position for which they applied. If they are determined to meet the minimum qualifications of the position, they are referred to the hiring authority on a Schedule A/non-competitive cert, and/or Disabled Veteran 30% or more cert, for their consideration. Once the hiring official makes a selection, the applicant is notified and provided instructions for completing the pre-employment requirements as outlined in the tentative job offer. Once the applicant has completed and passed all pre-employment requirements they are provided an appointment letter.

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

Answer Yes

1.As part of the mandatory annual training for managers and supervisors offeredonline as "ICE Disabilities 201," the use of the Schedule A hiring authority iscovered. 2.The Schedule A and veterans hiring authorities are covered under the annualmandatory training for all hiring managers/supervisors and HR Specialists. 3.EEO & Diversity Managers and Supervisors Update includes informationregarding special hiring authorities.

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.

The SPPC provides training at 7 Employment Centers in the District of Columbia, Maryland and Virginia regarding Schedule A hiring and provides one-on-one resume assistance. ODCR and the ICE Office of Human Capital (OHC) meet monthly to share resources to share resources, including the utilization of Field Special Emphasis Program Managers at recruitment events and the development of targeted recruitment plans for increasing the representation of PWD's and PWTD's.

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

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce are Law Enforcement Officers (LEO), and 7,306 or 37% non-Law Enforcement Officers (non-LEO). Analysis of the permanent workforce data contained in Table B-8 indicates that 21.66% of new hires were PWDs, while 2.13% percent of new hires were PWTD. The analysis conducted indicates that ICE does not have a trigger regarding PWD or PWTD among new hires in the permanent workforce. However, ICE conducted further analysis to determine if ICE has a trigger regarding PWD or PWTD as it relates to our Law Enforcement workforce, or our non-Law Enforcement workforce. Analysis of ICE workforce data indicates that 45% of new hires to the permanent workforce were Law Enforcement Officers, and 55% of new hires to the permanent workforce were non-Law Enforcement Officers. Regarding, Law Enforcement Officers, 2% of new hires were PWD, and 1% were PWTD, which is below the respective benchmarks. The physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE has and will continue to have triggers in reaching the benchmarks PWD and PWTD in the permanent workforce as it relates to Law Enforcement officers among new hires. Regarding non-Law

Enforcement Officers, 11% of new hires were PWD, which is below the benchmark. Also, among non-Law Enforcement Officers, 3% were PWTD, which is above the benchmark.

New Hires	Total (#)	Reportable Disability		Targeted Disability	
		Permanent Workforce (%)	Temporary Workforce (%)	Permanent Workforce (%)	Temporary Workforce (%)
% of Total Applicants	1403	4.42	0.00	1.43	0.00
% of Qualified Applicants	1353	4.51	0.00	1.48	0.00
% of New Hires	477	13.84	0.21	1.47	0.00

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

- a. New Hires for MCO (PWD) Answer Yes
- b. New Hires for MCO (PWTD) Answer Yes

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce are Law Enforcement Officers (LEO), and 7,306 or 37% non-Law Enforcement Officers (non-LEO). In comparison to the benchmarks, triggers exist for PWD (2.29%) and PWTD (0.00%) among the qualified external applicants for Criminal Investigator series (1811) as mission critical positions. The physical requirements of the Criminal Investigator series (1811), are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE has and will continue to have triggers in reaching the benchmarks PWD and PWTD among the new hires for these mission-critical occupations. In comparison to the benchmarks, triggers exist for PWD (7.14%) and PWTD (0.89%) among the qualified external applicants for the Attorney/General Attorney series (0905). ICE conducted further analysis to determine if ICE has a trigger regarding PWD or PWTD as it relates to new hires among our mission critical positions. Analysis of ICE workforce data indicates that 54% of new hires to the permanent workforce were for mission critical positions, and 46% of new hires to the permanent workforce were for non-mission critical positions. Regarding, mission critical positions (series 1811, 1801, and 0905), 2% of the new hires were PWD, and 1% were PWTD, which is below the respective benchmarks.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0132INTELLIGENC OFFICER	0	0.00	0.00	0.00	0.00
0905GENERAL ATTORNEY	163	4.91	4.91	1.84	0.61
1801IMMIGRATION ENFORCEMENT AGENT	1240	4.27	3.31	1.37	0.32
1811CRIMINAL INVESTIGATOR	0	0.00	0.00	0.00	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 Yes
- b. Qualified Applicants for MCO (PWTD) Answer Yes

The available applicant pool data includes all applicants. ICE is unable to separate the data, to identify only the internal applicants for a position. Thus, identifying which current ICE employees would qualify for a job series that they are not currently assigned to is a difficult undertaking. The ICE Office of Human Capital does not adjudicate applicant qualifications until an applicant applies for a specific position, and the applicant may qualify based on experience obtained prior to entry into their current job series, or into ICE. Based on the fact we are unable to identify only internal applicants for a position, ICE has determined that most likely, there are triggers for PWD and PWTD regarding qualified applicants for Mission Critical Occupations.

- 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

The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to General Inspection, Investigation, Enforcement and Compliance job series (1801) positions. In conducting a comparison of the available information to the benchmarks, it appears that a trigger exists for PWD (2.24%) and PWTD (0.40%) among the selections for promotion involving the General Inspection, Investigation, Enforcement and Compliance job series (1801) during FY 2018. The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to Criminal Investigator job series (1811) positions. In conducting a comparison of the available information, the benchmarks, it appears that a trigger exists for PWD (0.21%) and PWTD (0.21%) among the selections for promotion involving the Criminal Investigator job series (1811) during FY 2018. The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to Attorney/General Attorney series (0905) positions. In conducting a comparison of the available information, the benchmarks, it appears that a trigger exists for PWD (0.00%) and PWTD (0.00%) among the selections for promotion involving the Attorney/General Attorney series (0905) during FY 2018. The available Applicant Flow Data contains all applicants for promotions, thus ICE is unable to truly identify the percentage of qualified internal PWTD applicants whom have been promoted to Intelligence Research Specialist job series (0132) positions. In conducting a comparison of the available information, the benchmarks, it appears that a trigger exists for PWD (2.13%) and PWTD (2.13%) among the selections for promotion involving the Intelligence Research Specialist job series (0132) during FY 2018.

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

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

A. ADVANCEMENT PROGRAM PLAN

Describe the agency’s plan to ensure PWD, including PWTD, have sufficient opportunities for advancement.

In FY 2018, ODCR provided training for Managers and Supervisor’s with the goal of increasing their knowledge in the areas of Diversity, Reasonable Accommodation and Anti-Harassment. ODCR’s goal for providing this training is to equip Managers and Supervisor’s with the tools and resources available for recruiting and effectively managing PWD and PWTD employees. These tools and resources equip ICE Managers and Supervisor’s to identify the unique qualities of PWD and PWTD employees. In FY 2019, the Disability Program Manager is working with the ICE Office of Leadership and Career Development, to ensure data will be collected regarding PWD and PWTD participation, and that all notifications/announcements contain information for requesting a

reasonable accommodation.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

ICE offers training opportunities for employees via the DHS Performance and Learning Management System (PALMS) online portal. In addition to completing required training, this portal allows ICE employees to complete certification(s) and career development courses, which may lead to career advancement. The ICE Office of Leadership and Career Development (OLCD) consists of the Leadership Development Center and the Training and Performance Support Division. OLCD provides training for employees, Supervisors and Managers. The trainings provided serve to enhance current skills, and build new skills, which may enhance opportunities for career advancement. The Leadership Development Center (LDC) provides resident, virtual and exported leadership and career development training to enhance the knowledge, skills and abilities of all employees. The LDC supports professional development of all leader- levels of the Department of Homeland Security Leader Development Program framework to include a variety of services. The courses available via the LDC provides opportunities for employees to increase knowledge, skills and abilities leading to opportunities for career advancement. Additionally, ICE employees can participate in training opportunities provided by Department of Homeland Security. The Department of Homeland Security offers academic programs, leader development, career development, mandatory training, professional development and technical skills training.

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 Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Internship Programs						
Fellowship Programs						
Detail Programs						
Other Career Development Programs						
Coaching Programs	190	190				
Mentoring Programs	658	658				
Training Programs	1216	1216				

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

- a. Applicants (PWD) Answer Yes
- b. Selections (PWD) Answer Yes

In FY 2018, triggers appear to exist for PWD among applicants and selectees for Career Development Programs, because the requested data was available for analysis.

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

- a. Applicants (PWTD) Answer Yes

b. Selections (PWTD)

Answer Yes

In FY 2018, triggers appear to exist for PWTD among applicants and selectees for Career Development Programs, because the requested data was available for analysis.

C. AWARDS

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

a. Awards, Bonuses, & Incentives (PWD)

Answer Yes

b. Awards, Bonuses, & Incentives (PWTD)

Answer Yes

In FY 2018, the agency identified a trigger involving the percentage of PWD and PWTD who received Time Off Awards of 9+ hours. In FY 2018, the agency identified a trigger involving the percentage of PWD and PWTD who received Cash Awards of \$500+.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards: 1-9 hours : Total Time-Off Awards Given	1452	33.68	61.64	3.79	29.89
Time-Off Awards: 9+ hours : Total Time-Off Awards Given	18957	8.77	89.95	0.70	8.07

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$100 - \$500: Total Cash Awards Given	377	29.97	70.03	2.12	27.85
Cash Awards: \$501+: Total Cash Awards Given	18726	9.85	90.15	0.93	8.92

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 No

b. Pay Increases (PWTD)

Answer No

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Quality Step Increases (QSI): Total QSIs Awarded	70	12.86	87.14	2.86	10.00
Performance Based Pay Increase	0	0.00	0.00	0.00	0.00

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

a. Other Types of Recognition (PWD)

Answer N/A

b. Other Types of Recognition (PWTD)

Answer N/A

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 Yes

ii. Internal Selections (PWD) Answer Yes

b. Grade GS-15

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

c. Grade GS-14

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

d. Grade GS-13

i. Qualified Internal Applicants (PWD) Answer Yes

ii. Internal Selections (PWD) Answer Yes

In FY 2018, the percentage of PWD among the qualified internal applicants for SES (0.00%) fell below the benchmark according to the available data in Table B 11. However, because the available Applicant Flow Data contains all applicants for promotions not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to SES positions. Thus, we have determined that ICE has a perceived trigger regarding PWD among qualified internal applicants and/or selectees to SES positions. In FY 2018, the percentage of PWD among the qualified internal applicants for grade GS-15 (2.28%) fell below the benchmark according to the available data in Table B 11. However, because the available Applicant Flow Data contains all applicants for promotions not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS- 15 positions. Thus, we have determined that ICE has a perceived trigger regarding PWD among qualified internal applicants and/or selectees to GS-15 positions. In FY 2018, the percentage of PWD among the qualified internal applicants for grade GS-14 (3.85%) fell below the benchmark according to the available data in Table B 11. However, because the available Applicant Flow Data contains all applicants for promotions not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS- 14 positions. Thus, we have determined that ICE has a perceived trigger regarding PWD among qualified internal applicants and/or selectees to GS-14 positions. In FY 2018, the percentage of PWD among the qualified internal applicants for grade GS-13 (5.52%) fell below the benchmark according to the available data in Table B 11. However, because the available Applicant Flow Data contains all applicants for promotions, not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS- 13 positions. Thus, we have determined that ICE has a perceived trigger regarding PWD among qualified internal applicants and/or selectees to GS-13 positions.

2. 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 (PWT) Answer Yes

ii. Internal Selections (PWTD)	Answer	Yes
b. Grade GS-15		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
c. Grade GS-14		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes
d. Grade GS-13		
i. Qualified Internal Applicants (PWTD)	Answer	Yes
ii. Internal Selections (PWTD)	Answer	Yes

In FY 2018, the percentage of PWTD among the qualified internal applicants for SES (0.00%) fell below the benchmark. However, because the available Applicant Flow Data contains all applicants for promotions, not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to SES positions. Thus, we have determined that ICE has a perceived trigger regarding promotions to SES positions. In FY 2018, the percentage of PWTD among the qualified internal applicants for grade GS-15 (1.47%) fell below the benchmark. However, because the available Applicant Flow Data contains all applicants for promotions, not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS-15 positions. Thus, we have determined that ICE has a perceived trigger regarding promotions to GS-15 positions. In FY 2018, the percentage of PWTD among the qualified internal applicants for grade GS-14 (1.84%) fell below the benchmark. However, because the available Applicant Flow Data contains all applicants for promotions, not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS-14 positions. Thus, we have determined that ICE has a perceived trigger regarding promotions to GS-14 positions. In FY 2018, the percentage of PWTD among the qualified internal applicants for grade GS-13 (2.76) is above the benchmark. However, because the available Applicant Flow Data contains all applicants for promotions, not only Qualified Internal Applicants, ICE is unable to truly identify the percentage of qualified internal PWD applicants whom have been promoted to GS-13 positions. Thus, we have determined that ICE has a perceived trigger regarding promotions to GS-13 positions.

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

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce are Law Enforcement Officers (LEO), and 7,306 or 37% non-Law Enforcement Officers (non-LEO). The physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE may experience barriers in reaching the PWD benchmark as it relates to Law Enforcement officers among selectees for promotion. Analysis of Table B-11, indicates that 10% of new hires to SES were PWD, which is below the respective benchmark. Analysis of Table B-11, indicates that 9.09% of new hires to GS-15 were PWD, which is below the respective benchmark. Analysis of Table B-11, indicates that 9.86% of new hires to GS-14 were PWD, which is below the respective benchmark. The analysis conducted indicates that ICE has a trigger regarding PWTD among new hires senior grade levels, regarding SES, GS-15 and GS-14. However, ICE conducted

further analysis to determine if ICE has a trigger regarding PWD or PWTD as it relates to our Law Enforcement workforce, or our non-Law Enforcement workforce. Analysis of ICE workforce data indicates that 45% of new hires were Law Enforcement Officers, and 55% of new hires were non-Law Enforcement Officers. Regarding selectees for SES positions, four (4) individuals were selected, of which 25% were Law Enforcement Officers, and 75% were non-Law Enforcement. Additionally, of the four (4) selectees for SES positions 0.00% were PWD which falls below the respective benchmark. Regarding selectees for GS-15 positions, nineteen (19) individuals were selected, of which 11% were Law Enforcement Officers, and 89% were non-Law Enforcement Officers. Additionally, of the nineteen (19) selectees 11% were PWD which falls below the respective benchmark. Regarding selectees for GS-14 positions, 134 individuals were selected, of which 3% were Law Enforcement Officers, and 97% were non-Law Enforcement Officers. Additionally, of the 134 selectees, 10% were PWD which falls below the respective benchmark. Regarding selectees for GS-13 positions, 151 individuals were selected, of which 6% were Law Enforcement Officers, and 94% were non-Law Enforcement Officers. Additionally, of the 151 selectees, 7% were PWD which falls below the respective benchmark.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTD among the new hires to the senior grade levels? For non-GS pay plans, please use the approximate senior grade levels. If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
 - a. New Hires to SES (PWTD) Answer Yes
 - b. New Hires to GS-15 (PWTD) Answer Yes
 - c. New Hires to GS-14 (PWTD) Answer Yes
 - d. New Hires to GS-13 (PWTD) Answer No

The ICE total workforce in FY 2018 consisted of 19,896, permanent employees of which 12,589 or 63% of the workforce are Law Enforcement Officers (LEO), and 7,306 or 37% non-Law Enforcement Officers (non-LEO). The physical requirements of the Law Enforcement positions at ICE, are a barrier for PWD and PWTD applicants, that cannot be resolved, therefore ICE may experience barriers in reaching the PWTD benchmark as it relates to Law Enforcement officers among selectees for promotion. Analysis of Table B-11, indicates that 0.00% of new hires to SES were PWTD, which falls below the respective benchmark. Analysis of Table B-11, indicates that 0.57% of new hires to GS-15 were PWTD, which falls below the respective benchmark. Analysis of Table B-11, indicates that 0.70% of new hires to GS-14 were PWTD, which is below the respective benchmark. The analysis conducted indicates that ICE has a trigger regarding PWTD among new hires senior grade levels, regarding SES, GS-15 and GS-14. However, ICE conducted further analysis to determine if ICE has a trigger regarding PWTD as it relates to our Law Enforcement workforce, or our non-Law Enforcement workforce. Analysis of ICE workforce data indicates that 45% of new hires were Law Enforcement Officers, and 55% of new hires were non-Law Enforcement Officers. Regarding selectees for SES positions, four (4) individuals were selected, of which 25% were Law Enforcement Officers, and 75% were non-Law Enforcement. Additionally, of the four (4) selectees for SES positions 0.00% were PWTD which falls below the respective benchmark. Regarding selectees for GS-15 positions, nineteen (19) individuals were selected, of which 11% were Law Enforcement Officers, and 89% were non-Law Enforcement Officers. Additionally, of the nineteen (19) selectees 0.00% were PWTD which falls below the respective benchmark. Regarding selectees for GS-14 positions, 134 individuals were selected, of which 3% were Law Enforcement Officers, and 97% were non-Law Enforcement Officers. Additionally, of the 134 selectees, 0.7% were PWTD which falls below the respective benchmark. Regarding selectees for GS-13 positions, 151 individuals were selected, of which 6% were Law Enforcement Officers, and 94% were non-Law Enforcement Officers. Additionally, of the 151 selectees, 5% were PWTD which falls below the respective benchmark.

5. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to supervisory positions? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) If “yes”, describe the trigger(s) in the text box. Select “n/a” if the applicant data is not available for your agency, and describe your plan to provide the data in the text box.
 - a. Executives
 - i. Qualified Internal Applicants (PWD) Answer Yes
 - ii. Internal Selections (PWD) Answer Yes

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

Applicant Flow data is not available in a means to which ICE has access to Qualified Internal Applicant data for populating the B tables. ICE follow's OPM's guidance with applicant flow data and uses "Public=No" for promotions applicant flow data. Due to this, the comparison of workforce data to Qualified in the applicant flow data is not as intended. We have determined that due to the lack of data that ICE most likely has triggers regarding Qualified Internal Applicants within Executives, Managers and Supervisors at all levels .Due to the inability to identify only Qualified Internal Applicants, we have determined that ICE most likely has triggers in Qualified Internal Applicants within Executives, Managers and Supervisors at all levels. According to data provided by CRCL it appears that a trigger exists for PWD among the selectees for promotions to GS-15 and SES as 9.71% of the selectees were PWD. According to data provided by CRCL it appears that a trigger exists for PWD among the selectees for promotions to GS 13 - 14 as 10.97% of the selectees were PWD. According to the data provided by CRCL it appears that a trigger exists for PWD among the selectees for promotions to GS 12 and below as 0.00% of the selectees were PWD.

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

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

Applicant Flow data is not available in a means to which ICE has access to Qualified Internal Applicant data for populating the B tables. ICE follow's OPM's guidance with applicant flow data and uses "Public=No" for promotions applicant flow data. Due to this, the comparison of workforce data to Qualified in the applicant flow data is not as intended. We have determined that due to the lack of data that ICE most likely has triggers regarding Qualified Internal Applicants within Executives, Managers and Supervisors at all levels. Due to the inability to identify only Qualified Internal Applicants, we have determined that ICE most likely has triggers in Qualified Internal Applicants within Executives, Managers and Supervisors at all levels. According to data provided by CRCL it appears that a trigger exists for PWTD among the selectees for promotions to GS-15 and SES as 0.97% of the selectees were PWTD. According to data provided by CRCL it appears that a trigger exists for PWTD among the selectees for promotions to GS 13 - 14 as 0.42% of the selectees were PWTD. According to the data provided by CRCL it appears that a trigger exists for PWTD among the selectees for promotions to GS 12 and below as 0.00% of the selectees were PWTD.

7.

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

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

According to data provided by CRCL it appears that a trigger exists for PWD among the selectees for new hires to GS-15 and SES as 11.11% of the selectees were PWD. According to the data provided by CRCL it appears that a trigger exists for PWD among the selectees for new hires to GS 12 and below as 0.00% of the selectees were PWD.

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

- a. New Hires for Executives (PWTD) Answer Yes
- b. New Hires for Managers (PWTD) Answer Yes
- c. New Hires for Supervisors (PWTD) Answer Yes

According to data provided by CRCL it appears that a trigger exists for PWTD among the selectees for new hires to GS-15 and SES as 0.00% of the selectees were PWTD. According to the data provided by CRCL it appears that a trigger exists for PWTD among the selectees for new hires to GS-13 to14 as 0.00% of the selectees were PWTD. According to the data provided by CRCL it appears that a trigger exists for PWTD among the selectees for new hires to GS-12 and below as 0.00% of the selectees were PWTD.

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

All Schedule A employees, whom were eligible for conversion to competitive service in FY 2018 were not converted. ODCR has received updated data regarding the ICE Schedule A employees eligible for conversion and is working with the Office of Human Capital to ensure those who have satisfactorily completed their two years are converted to competitive service, as appropriate.

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 No
- b. Involuntary Separations (PWD) Answer No

Utilizing the inclusion rate as the benchmark, the percentage of PWD among voluntary and involuntary separations was 7.52% for PWD, which is lower than the corresponding percentages for persons without disabilities. The analysis conducted utilizing the inclusion rate, indicates that ICE does not trigger regarding PWD among voluntary or involuntary separations. However, ICE conducted further analysis utilizing available workforce data to evaluate the percentage of Law Enforcement Officers versus non-Law Enforcement Officers whom separated from ICE during FY 2018. Additionally, analysis was conducted with the corresponding workforce data to determine the percentage of PWD separations versus the separations of employees without disabilities. According to the available workforce data, 1209 employees separated from the agency during FY 2018, which included 60 involuntary separations, and 1149 voluntary separations. The PWD's whom voluntarily separated from the agency represented 8% of the total voluntary separations, of which 1.5% were Law Enforcement Officers. The PWD's whom were involuntarily separated from the agency represented 13% of the involuntary separations, of which 1.6% were Law Enforcement Officers.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permenant Workforce	19896	11.93	88.07
Total Separations	1043	17.26	82.74
Voluntary Separations	1000	16.70	83.30
Involuntary Separations	43	30.23	69.77

3. Using the inclusion rate as the benchmark, did the percentage of PWTD among voluntary and involuntary separations exceed that of persons without targeted disabilities? If “yes”, describe the trigger below.
- a. Voluntary Separations (PWTD) Answer No
 - b. Involuntary Separations (PWTD) Answer No

Utilizing the inclusion rate as the benchmark, the percentage of PWD among voluntary and involuntary separations was 10.71% for PWTD, which are lower than the corresponding percentages for persons without disabilities. The analysis conducted utilizing the inclusion rate, indicates that ICE does not trigger regarding PWTD among voluntary or involuntary separations. However, ICE conducted further analysis utilizing available workforce data to evaluate the percentage of Law Enforcement Officers versus non-Law Enforcement Officers whom separated from ICE during FY 2018. Additionally, analysis was conducted with the

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permenant Workforce	19896	1.11	98.89
Total Separations	1043	2.30	97.70
Voluntary Separations	1000	2.30	97.70
Involuntary Separations	43	2.33	97.67

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.

Not applicable

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.

A notice of employees' and applicants' rights under Section 508 appears at: <https://www.ice.gov/doclib/about/offices/dcr/pdf/noticeOfRightsABA.pdf>.

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.

A notice of employees' and applicants' rights under the Architectural Barriers Act appears at: <https://www.ice.gov/doclib/about/offices/dcr/pdf/noticeOfRightsABA.pdf>.

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.

ODCR staff is currently working with supervisors in various locations throughout ICE to address identified architectural barriers. Additionally, ODCR staff is drafting a plan to assess ICE facilities to identify potential Architectural Barriers. ODCR staff will be conducting a walkthrough of ICE facilities in Washington DC during FY 2019. F-SEPM's will be provided training in FY 2020 to conduct walkthroughs of ICE Facilities. The F-SEPM's will be utilized to complete walkthroughs of ICE Facilities, during which they will complete a checklist and return a written report to the Disability Program Manager. We will implement strategies to resolve the identified Architectural Barriers from the Washington DC inspections in FY 2020. ODCR staff is currently working with OCIO and the 508 Compliance Office to resolve issues related to the use of JAWS on the ICE network, to improve accessibility for visually impaired employees to the ICE network.

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.)

The average processing time for reasonable accommodation requests in FY 2018 was 90.5 days.

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

In FY 2018, the reasonable accommodation internal tracking system was revised to include additional information to facilitate the identification of barriers within the processing of requests. The gathering of this additional information has provided us the opportunity to streamline our processes, with the goal of reducing the number of processing days. To date, in FY 2019 on average we have reduced the number of processing days by nine percent (9%). Standardized emails were developed to aid reasonable accommodation coordinators when requesting needed information from employees and decision-makers. The development of these standardized emails has led to an increase in responses from employees and decision-makers. Additionally, we have noted that decision-makers are providing more in-depth responses regarding decisions as well as an increase in decision-makers providing alternative accommodations if the requested accommodation would not be effective.

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.

Beginning in the third quarter of FY 2018, ICE commenced drafting PAS procedures and the corresponding templates. The draft PAS procedures and templates are now undergoing internal clearance. The draft Statement of Work has been prepared, as well as the market research report. In the interim, ICE provided PAS FAQ's to Managers and Supervisors during FY 2018 mandatory EEO training and published them on ICE's intranet site, and available to all employees.

Section VII: EEO Complaint and Findings Data

A. EEO COMPLAINT DATA INVOLVING HARASSMENT

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

Answer No

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 No

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.

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 No

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 No

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.

Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than expected participation of PWD (10.13%) in the permanent workforce, regarding grade GS-11 to SES, as compared to the goal of 12%.</p>				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <hr/> <p>People with Disabilities</p>				
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>					
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>				
<p>Objective</p>	<p>To determine if barriers exist for GS-11 to SES in the permanent workforce regarding PWD.</p> <table border="1" data-bbox="440 938 1513 1085"> <tr> <td data-bbox="440 938 649 993">Date Objective Initiated</td> <td data-bbox="659 938 1513 993">Oct 1, 2019</td> </tr> <tr> <td data-bbox="440 1001 649 1085">Target Date For Completion Of Objective</td> <td data-bbox="659 1001 1513 1085">Sep 30, 2020</td> </tr> </table>	Date Objective Initiated	Oct 1, 2019	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Oct 1, 2019				
Target Date For Completion Of Objective	Sep 30, 2020				
<p>Responsible Officials</p>	<p>Robin Kilgore Deputy Assistant Director ODCR Lynn Dickson Disability Program Manager Scott Lanum Assistant Director ODCR Rita Bhanot Acting Deputy Chief DMD Stacie Jones Chief Diversity Officer</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis to identify any potential barriers.	No		
01/31/2020	Draft a plan of action to resolve identified barriers.	No		
01/31/2020	Develop a state by state list of local disability agencies whom serve potential job candidates.	No		
01/31/2020	Develop a state by state list of local disability agencies whom serve potential job candidates.	No		
06/30/2020	Implement plans of action to resolve identified barriers.	No		
06/30/2020	Develop a state by state list of universities and colleges whom provide career development services for individuals with disabilities.	No		
09/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants at community events.	No		
09/30/2019	Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	Yes		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		
09/30/2019	Conduct a pilot walk-through of ICE facilities in Washington DC to identify Architectural Barriers.	Yes		
12/30/2019	Conduct a pilot walk-through of ICE facilities in Baltimore to identify Architectural Barriers.	Yes		
01/31/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Washington DC.	Yes		
06/30/2020	Implement resolutions for identified Architectural Barriers for ICE Facilities in Washington DC.	Yes		
03/30/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Baltimore.	Yes		
06/30/2020	Implement resolutions for identified Architectural Barriers for ICE Facilities in Washington DC.	Yes		
03/30/2020	Develop training for F-SEPM's regarding the identification of Architectural Barriers	Yes		
06/30/2020	Provide training for F-SEPM's for conducting independent inspections to identify Architectural Barriers,	Yes		
09/30/2020	Establish a national strategy to conduct Architectural Barrier investigations of ICE facilities.	Yes		
09/30/2020	Establish a national strategy to conduct Architectural Barrier investigations of ICE facilities.	Yes		
Fiscal Year	Accomplishments			

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Reasonable Accommodation program lacks sufficient staffing to process requests within the 15-day business day time frame set forth in the agency procedures for reasonable accommodations.</p>
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>

<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>	
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<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>An ineffective reasonable accommodation program, involving the untimely processing of requests.</p>
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<p>Objective</p>	<p>Improve the timeliness of processing reasonable accommodation requests.</p> <table border="1" data-bbox="446 955 1503 1102"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2019				
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<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager Stacie Jones Chief Diversity Officer Scott Lanum Assistant Director for Civil Rights Robin Kilgore Deputy Assistant Director for Civil Rights Rita Bhanot Acting Deputy Chief Diversity Officer</p>
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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2020	Continue to monitor and revise the tracking system for reasonable accommodation program, to identify bottlenecks.	Yes		
09/30/2019	Revise the tracking system for reasonable accommodation, to gather needed data for MD 715 reporting.	Yes		
09/30/2019	Revise ICE Reasonable Accommodation policy and procedures and re-assess via benchmarking the requirement to process RA requests within 15 business days.	Yes		
12/31/2019	Revise ODCR internal SOP and templates for processing RA requests.	Yes		
06/30/2020	Develop reasonable accommodation training regarding the revised procedures.	No		
09/30/2020	Provide training for managers, supervisors, and employees regarding the revised reasonable accommodation procedures	Yes		
09/30/2019	Coordinate with Project Manager for the current contract to facilitate the assignment of RA projects to available contractors.	No		
09/30/2019	Review the current staffing plan and submit requests to fill vacant positions.	Yes		

Fiscal Year	Accomplishments
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	ICE has a perceived trigger involving PWD and PWTD among qualified internal applicants for mission critical occupations.
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STATEMENT OF BARRIER GROUPS:	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>
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BARRIER ANALYSIS:	
Provide a description of the steps taken and data analyzed to determine cause of the condition.	

STATEMENT OF IDENTIFIED BARRIER:	Data is not available for Qualified Internal Applicants.
Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	

Objective	Obtain applicant flow data for qualified internal applicants.				
	<table border="0"> <tr> <td style="padding-right: 5px;">Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td style="padding-right: 5px;">Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2019				
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Responsible Officials	<p>Lynn Dickson Disability Program Manager</p> <p>Stacie Jones Chief Diversity Officer</p> <p>RIta Bhanot Acting Deputy Chief of Diversity</p> <p>Scott Lanum Assistant Director for Civil Rights</p> <p>Robin Kilgore Deputy Assistant Director</p>
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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Monitor updates regarding the availability of updated Internal Applicant Data.	No		
09/30/2020	Conduct barrier analysis to determine if triggers exist, once data is available.	No		

Fiscal Year	Accomplishments
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>ICE has a perceived trigger involving PWD and PWTD among employees promoted to mission critical occupations.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>							
<p>Objective</p>	<p>Obtain applicant flow data for qualified internal applicants.</p> <table border="1" data-bbox="440 957 1513 1104"> <tr> <td data-bbox="440 957 646 1020">Date Objective Initiated</td> <td data-bbox="646 957 1513 1020">Sep 30, 2019</td> </tr> <tr> <td data-bbox="440 1020 646 1104">Target Date For Completion Of Objective</td> <td data-bbox="646 1020 1513 1104">Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2019							
Target Date For Completion Of Objective	Sep 30, 2020							
<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager</p> <p>Stacie Jones Chief Diversity Officer</p> <p>Rita Bhanot Acting Deputy Chief Diversity Officer</p> <p>Scott Lanum Assistant Director</p> <p>Robin Kilgore Deputy Assistant Director</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/30/2019</p>	<p>Monitor updates regarding the availability of updated Internal Applicant Data.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Conduct barrier analysis to determine if triggers exist, once data is available.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Has the agency provided sufficient funding and other resources to successfully implement the disability program during the reporting period?</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>Insufficient resources for processing reasonable accommodation requests and implementation of the disability program.</p>							
<p>Objective</p>	<p>Leverage available resources for processing reasonable accommodation requests, and implementation of the disability program.</p> <table border="1" data-bbox="483 987 649 1125"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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<p>Responsible Officials</p>	<p>Lynn Dickson Divisibility Program Manager Stacie Jones Chief Diversity Officer Rita Bhanot Acting Deputy Chief Diversity Officer Scott Lanum Assistant Director for Civil Rights Robin Kilgore Deputy Assistant Director for Civil Rights</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/30/2019</p>	<p>Provide additional training for reasonable accommodation staff, and contractors.</p>	<p>No</p>						
<p>09/30/2019</p>	<p>Coordinate with Project Manager for the current contract to facilitate the assignment of RA projects to available contractors.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than expected participation of PWTD applicants and/or selectees for Career Development Programs.</p>				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>				
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>					
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>To date no barrier has been identified.</p>				
<p>Objective</p>	<p>Identify potential barriers to participation and enhance data gathering for PWTD participants for Career Development Programs.</p> <table border="1" data-bbox="483 989 649 1129"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2021</td> </tr> </table>	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2021
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<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager Stacie Jones Chief Diversity Officer Rita Bhanot Acting Deputy Chief of Diversity Scott Lanum Assistant Director for Civil Rights Robin Kilgore Deputy Assistant Director for Civil Rights</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Schedule a meeting with the Office of Leadership and Career Development to discuss data gathering requirements.	No		
10/31/2019	Schedule a meeting with the ICE Chiefs of Staff office to discuss detail assignments and data gathering requirements.	No		
11/30/2019	Schedule a meeting with the Office of Leadership and Career Development to discuss Internship and Fellowship programs and data gathering requirements.	No		
12/30/2019	Schedule a meeting with the PALMS point of contact to ensure information is available regarding reasonable accommodations.	No		
12/31/2019	Review application for Leadership and Career Development programs to ensure it contains information regarding reasonable accommodations.	No		
12/31/2019	Coordinate with Leadership and Career Development to ensure all announcements contain information for requesting reasonable accommodation.	No		
03/20/2020	ICE Broadcast to workforce informing them that Reasonable Accommodations are available for individuals participating in Career Development programs.	No		
09/30/2020	Develop Reasonable Accommodation marketing materials that can be distributed by OCLD, and other ICE Career Development programs, providing information on how to request a RA for participation in a Career Development program.	No		
09/30/2020	Disability Awareness month fair, to include community partner demonstrations, info sessions and career development sessions.	No		
09/30/2021	Collaborate with OCLD to update the website regarding reasonable accommodations and ensure 508 compliance.	No		
Fiscal Year	Accomplishments			

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than expected participation of PWD applicants and/or selectees for Career Development Programs.</p>				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>				
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<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>				
<p>Objective</p>	<p>Identify potential barriers to participation and enhance data gathering for PWD participants for Career Development Programs.</p> <table border="1" data-bbox="483 989 649 1129"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>	Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Schedule a meeting with the Office of Leadership and Career	Yes		03/27/2019
10/31/2019	Schedule a meeting with the ICE Chiefs of Staff office to discuss detail assignments and data gathering requirements.	No		
11/30/2019	Schedule a meeting with the Office of Leadership and Career Development to discuss Internship and Fellowship programs and data gathering requirements.	No		
12/31/2019	Review application for Leadership and Career Development programs to ensure it contains information regarding requesting a reasonable accommodation.	No		03/28/2019
12/31/2019	Review application for Leadership and Career Development programs to ensure it contains information regarding requesting a reasonable accommodation.	No		03/28/2019
12/31/2019	Schedule a meeting with the PALMS point of contact to ensure information is available regarding reasonable accommodations.	No		
03/30/2020	ICE Broadcast to workforce informing them that Reasonable Accommodations are available for individuals participating in Career Development programs.	No		
09/30/2020	Develop Reasonable Accommodation marketing materials that can be distributed by OCLD, and other ICE Career Development programs, providing information on how to request a RA for participation in a Career Development program.	No		
09/30/2020	Disability Awareness month fair, to include community partner demonstrations, info sessions and career development sessions.	No		
09/30/2021	Collaborate with OCLD to update the website regarding reasonable accommodations and ensure 508 compliance.	No		
Fiscal Year	Accomplishments			

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for promotions to supervisory positions.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
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<p>Objective</p>	<p>Obtain applicant flow data for Qualified Internal Applicants.</p> <table border="1" data-bbox="483 961 1502 1108"> <tr> <td>Date Objective Initiated</td> <td>Oct 1, 2018</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Oct 1, 2018	Target Date For Completion Of Objective	Sep 30, 2020
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<p>09/30/2019</p>	<p>Monitor updates regarding the availability of updated Internal Applicant Data.</p>	<p>Yes</p>						
<p>09/20/2020</p>	<p>Conduct barrier analysis to identify potential triggers, upon receipt of updated available.</p>	<p>Yes</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The low number of selections of PWD among new hires to supervisory positions.</p>																							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>																							
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<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>																							
<p>Objective</p>	<p>To identify and resolve potential barriers resulting in an Increase in the number PWTD selectees among new hires to supervisory positions.</p> <table border="1" data-bbox="487 961 1507 1108"> <tr> <td>Date Objective Initiated</td> <td>Oct 1, 2018</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Jun 30, 2020</td> </tr> </table>				Date Objective Initiated	Oct 1, 2018	Target Date For Completion Of Objective	Jun 30, 2020																
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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)																				
09/30/2019	Conduct additional analysis to identify any potential barriers.	No																						
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The low number of selections of PWTB among new hires to supervisory positions.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Targeted Disabilities</p> <p>People with Targeted Disabilities</p>							
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<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>							
<p>Objective</p>	<p>To identify and resolve potential barriers resulting in an Increase in the number PWTB selectees among new hires to supervisory positions.</p> <table border="1" data-bbox="487 987 649 1134"> <tr> <td>Date Objective Initiated</td> <td>Oct 1, 2018</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Oct 1, 2018	Target Date For Completion Of Objective	Sep 30, 2020
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<p>09/30/2019</p>	<p>Conduct additional analysis to identify any potential barriers.</p>	<p>No</p>						
<p>01/31/2020</p>	<p>Draft a plan of action to resolve identified barriers.</p>	<p>No</p>						
<p>06/30/2020</p>	<p>Implement plans of action to resolve identified barriers.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>All Schedule A employees eligible for conversion, were not converted into the competitive service after two years of satisfactory service.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>							
<p>Objective</p>	<p>All Schedule A employees eligible for conversion, will be converted into the competitive service after two years of satisfactory service.</p> <table border="1" data-bbox="487 955 1502 1102"> <tr> <td>Date Objective Initiated</td> <td>Oct 1, 2018</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Jun 30, 2020</td> </tr> </table>				Date Objective Initiated	Oct 1, 2018	Target Date For Completion Of Objective	Jun 30, 2020
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<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The low number of selections of PWD and PWTD regarding new hires for Mission Critical Positions; Criminal Investigator (1811), Attorney/General Attorney (0905), as compared to the goal(s) of 12% and 2%.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>A barrier exists for PWD and PWTD candidates for the Criminal Investigator (1811) series because of the physical requirements. To date, a barrier has not been identified in regard to Attorney/General Attorney (0905).</p>							
<p>Objective</p>	<p>To increase the number of PWD and PWTD selections (new hires) for Mission Critical Positions.</p> <table border="1" data-bbox="441 961 1513 1108"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2021</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2021
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Target Date For Completion Of Objective	Sep 30, 2021							
<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager Scott Lanum Assistant Director for Civil Rights Stacie Jones Chief Diversity Officer Rita Bhanot Acting Deputy Diversity Officer Robin Kilgore Deputy Assistant Director for Civil Rights</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/19/2019</p>	<p>Conduct additional analysis to identify any potential barriers regarding Attorney/General Attorney (0905).</p>	<p>No</p>						
<p>01/31/2020</p>	<p>Draft a plan of action to resolve identified barriers.</p>	<p>No</p>						
<p>06/30/2020</p>	<p>Implement plans of action to resolve identified barriers.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>ODCR and the Office of Human Capital will share resources, including the utilization of Field Special Emphasis Program Managers at recruitment events.</p>	<p>No</p>						
<p>01/31/2021</p>	<p>ODCR and the Office of Human Capital will share resources and participate in recruitment events for Gallaudet University and the National Technical Institute for the Deaf (NTID) at the Rochester Institute of Technology.</p>	<p>No</p>						
<p>09/30/2021</p>	<p>Develop marketing materials to be provided to the Disability Program Point of Contact at these institutions.</p>	<p>No</p>						
<p>03/30/2021</p>	<p>Develop a state by state list of Law Schools and their Disability Program Point of Contact.</p>	<p>No</p>						
<p>06/30/2021</p>	<p>Draft an outreach plan in partnership with Office of Human Capital to target these institutions.</p>	<p>No</p>						

Fiscal Year	Accomplishments
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than expected representation of PWD and PWTD whom received time off awards of 9+ hours, and cash awards 500+.</p>
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STATEMENT OF BARRIER GROUPS:	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>
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BARRIER ANALYSIS:	<p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>
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STATEMENT OF IDENTIFIED BARRIER:	N/A
<p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	

Objective	<p>Identify and resolve potential barriers regarding PWD and PWTD within the awards programs.</p> <p>Date Objective Initiated Sep 30, 2019</p> <hr/> <p>Target Date For Completion Of Objective Jun 30, 2020</p>
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Responsible Officials	<p>Robin Kilgore Deputy Assistant Director</p> <p>Lynn Dickson Disability Program Manager</p> <p>Stacie Jones Diversity Chief</p> <p>Rita Bhanot Acting Deputy Diversity Chief</p> <p>Scott Lanum Assistant Director for Civil Rights</p>
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Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct additional analysis to identify any potential barriers.	No		
03/30/2020	Conduct a focus group with supervisors.	No		
04/30/2020	Conduct a focus group with employees.	No		
01/31/2020	Establish a plan of action to resolve identified barriers.	No		
06/30/2020	Implement plans of action to resolve identified barriers.	No		

Fiscal Year	Accomplishments
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<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for promotions to the senior grade levels.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>							
<p>Objective</p>	<p>Obtain applicant flow data for qualified internal applicants.</p> <table border="1" data-bbox="440 957 1513 1104"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
Date Objective Initiated	Sep 30, 2019							
Target Date For Completion Of Objective	Sep 30, 2020							
<p>Responsible Officials</p>	<p>Rita Bhanot Acting Deputy Chief Diversity Officer Scott Lanum Assistant Director for Civil Rights Lynn Dickson Disability Program Manager Stacie Jones Chief Diversity Officer Robin Kilgore Deputy Assistant Director</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>09/30/2019</p>	<p>Monitor updates regarding the availability of updated Internal Applicant Data.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Conduct barrier analysis to identify potential triggers, upon receipt of updated available.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than anticipated rate of selectees from the qualified applicant pool for PWD new hires from GS – 14 to SES.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>							
<p>Objective</p>	<p>To identify and resolve potential barriers, resulting in an Increase in the number of PWD selectees for GS – 14 to SES.</p> <table border="1" data-bbox="483 982 649 1129"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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Target Date For Completion Of Objective	Sep 30, 2020							
<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager</p> <p>Stacie Jones Chief Diversity Officer</p> <p>Scott Lanum Assistant Director for Civil Rights</p> <p>Robin Kilgore Deputy Assistant Director</p> <p>Rita Bhanot Acting Deputy Chief Diversity Officer</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>01/31/2020</p>	<p>Establish a plan of action to resolve identified barriers.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Implement plans of action to resolve identified barriers.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.</p>	<p>No</p>						
<p>09/30/2019</p>	<p>Conduct additional analysis to identify any potential barriers.</p>	<p>Yes</p>						
<p>01/31/2020</p>	<p>Develop a list of state by state disability agencies whom serve potential job candidates.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Develop reasonable accommodation materials to be provided to perspective job applicants at community events.</p>	<p>No</p>						
<p>09/30/2019</p>	<p>Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than expected participation of PWTD (0.89%) in the permanent workforce, regarding grade GS-11 to SES.</p>				
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <hr/> <p>People with Targeted Disabilities</p>				
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>					
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>				
<p>Objective</p>	<p>To determine if barriers exist for GS-11 to SES in the permanent workforce regarding PWTD.</p> <table border="1" data-bbox="440 940 1495 1087"> <tr> <td data-bbox="440 940 646 993"> <p>Date Objective Initiated</p> </td> <td data-bbox="654 940 1495 993"> <p>Sep 30, 2019</p> </td> </tr> <tr> <td data-bbox="440 1003 646 1087"> <p>Target Date For Completion Of Objective</p> </td> <td data-bbox="654 1003 1495 1087"> <p>Sep 30, 2020</p> </td> </tr> </table>	<p>Date Objective Initiated</p>	<p>Sep 30, 2019</p>	<p>Target Date For Completion Of Objective</p>	<p>Sep 30, 2020</p>
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<p>Target Date For Completion Of Objective</p>	<p>Sep 30, 2020</p>				
<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager Stacie Jones Chief of Diversity Rita Bhanot Acting Deputy Chief of Diversity Scott Lanum Assistant Director for Civil Rights Robin Kilgore Deputy Assistant Director for Civil Rights</p>				

Target Date (mm/dd/yyyy)	Planned Activities	Sufficient Staffing & Funding (Yes or No)	Modified Date (mm/dd/yyyy)	Completion Date (mm/dd/yyyy)
09/30/2019	Conduct barrier analysis to identify any potential barriers.	No		
01/31/2020	Draft a plan of action to resolve identified barriers.	No		
06/30/2020	Implement plans of action to resolve identified barriers.	No		
01/31/2020	Develop a state by state list of local disability agencies whom serve potential job candidates.	No		
06/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants.	No		
06/30/2020	Develop a state by state list of universities and colleges whom provide career development services for individuals with disabilities.	No		
09/30/2020	Develop reasonable accommodation materials to be provided to perspective job applicants at community events.	No		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		
09/30/2020	Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	No		
09/30/2020	Conduct a pilot walk-through of ICE facilities in Washington DC to identify Architectural Barriers.	No		
09/30/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Washington DC.	No		
06/30/2020	Implement resolutions for identified Architectural Barriers for ICE Facilities in Washington DC.	No		
01/31/2020	Draft a plan to address identified Architectural Barriers for ICE Facilities in Washington DC.	No		
03/30/2020	Develop training for F-SEPM's regarding the identification of Architectural Barriers	No		
06/30/2020	Provide training for F-SEPM's for conducting independent inspections to identify Architectural Barriers	No		
09/30/2020	Draft a plan to expand investigations related to Architectural Barriers to other geographic locations.	No		
09/30/2020	Establish a national strategy to conduct Architectural Barrier investigations of ICE facilities.	No		
Fiscal Year	Accomplishments			

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>Reasonable Accommodations Staff have not received sufficient training to carry out their responsibilities, due to a high volume of RA staff turnover during FY 2018.</p>							
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>							
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>								
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>An ineffective reasonable accommodation program, due insufficiently trained Reasonable Accommodation Staff.</p>							
<p>Objective</p>	<p>Provide specialized training for Reasonable Accommodation Coordinators during FY 2019.</p> <table border="1" data-bbox="440 961 1515 1115"> <tr> <td>Date Objective Initiated</td> <td>Jun 1, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 20, 2020</td> </tr> </table>				Date Objective Initiated	Jun 1, 2019	Target Date For Completion Of Objective	Sep 20, 2020
Date Objective Initiated	Jun 1, 2019							
Target Date For Completion Of Objective	Sep 20, 2020							
<p>Responsible Officials</p>	<p>Lynn Dickson Disability Program Manager</p> <p>Stacie Jones Chief Diversity Officer</p> <p>Rita Bhanot Acting Deputy Chief Diversity Officer</p> <p>Scott Lanum Assistant Director for Civil Rights</p> <p>Robin Kilgore Deputy Assistant Director for Civil Rights</p>							
<p>Target Date (mm/dd/yyyy)</p>	<p>Planned Activities</p>	<p>Sufficient Staffing & Funding (Yes or No)</p>	<p>Modified Date (mm/dd/yyyy)</p>	<p>Completion Date (mm/dd/yyyy)</p>				
<p>06/01/2019</p>	<p>DPM will develop and provide in- house training for Reasonable Accommodation Coordinators.</p>	<p>No</p>						
<p>06/30/2019</p>	<p>Reasonable Accommodation Coordinators will participate in EEOC Disability Program Manager (Basics)</p>	<p>No</p>						
<p>09/30/2019</p>	<p>DPM will provide one-on-one training as needed to assist Reasonable Accommodation Coordinators in developing skills needed for processing RA cases</p>	<p>Yes</p>						
<p>09/30/2019</p>	<p>DPM will attend the EEOC Excel Training Conference</p>	<p>No</p>						
<p>09/30/2019</p>	<p>A Reasonable Accommodation Coordinator will attend the FDR 2019 conference.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Maintain contact with DEOMI registration staff regarding training opportunities, for non-DOD entities.</p>	<p>No</p>						
<p>09/30/2020</p>	<p>Participate in DEOMI training opportunities, when available.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for promotions to the senior grade levels.</p>											
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p> <p>People with Targeted Disabilities</p>											
<p>BARRIER ANALYSIS:</p> <p>Provide a description of the steps taken and data analyzed to determine cause of the condition.</p>												
<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>											
<p>Objective</p>	<p>Applicant flow data is not available specific to qualified internal applicants.</p> <table border="1" data-bbox="440 957 1513 1104"> <tr> <td data-bbox="440 957 646 1020">Date Objective Initiated</td> <td colspan="3" data-bbox="646 957 1513 1020">Sep 30, 2019</td> </tr> <tr> <td data-bbox="440 1020 646 1104">Target Date For Completion Of Objective</td> <td colspan="3" data-bbox="646 1020 1513 1104">Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019			Target Date For Completion Of Objective	Sep 30, 2020		
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<p>09/30/2019</p>	<p>Monitor updates regarding availability of updated Internal Applicant Data.</p>	<p>No</p>										
<p>09/30/2020</p>	<p>Conduct barrier analysis to identify potential triggers, upon receipt of updated available.</p>	<p>No</p>										
<p>Fiscal Year</p>	<p>Accomplishments</p>											

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>The lower than anticipated rate of selectees from the qualified applicant pool for PWD new hires from GS – 14 to SES.</p>							
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<p>Objective</p>	<p>To identify and resolve potential barriers, resulting in an Increase in the number of PWD selectees for GS – 14 to SES.</p> <table border="1" data-bbox="483 982 649 1129"> <tr> <td>Date Objective Initiated</td> <td>Sep 30, 2019</td> </tr> <tr> <td>Target Date For Completion Of Objective</td> <td>Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020
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<p>09/30/2019</p>	<p>Conduct additional analysis to identify any potential barriers.</p>	<p>No</p>						
<p>01/31/2020</p>	<p>Draft a plan of action to resolve identified barriers.</p>	<p>No</p>						
<p>06/30/2019</p>	<p>Implement plans of action to resolve identified barriers.</p>	<p>No</p>						
<p>01/31/2020</p>	<p>Develop a list of state by state local disability agencies whom serve potential job candidates.</p>	<p>No</p>						
<p>09/30/2019</p>	<p>Develop reasonable accommodation materials to be provided to perspective job applicants at community outreach events.</p>	<p>No</p>						
<p>12/31/2019</p>	<p>Coordinate with SPPC and Recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.</p>	<p>Yes</p>						
<p>09/30/2020</p>	<p>Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.</p>	<p>No</p>						
<p>Fiscal Year</p>	<p>Accomplishments</p>							

<p>STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:</p> <p>Provide a brief narrative describing the condition at issue.</p> <p>How was the condition recognized as a potential barrier?</p>	<p>ICE has a perceived trigger involving PWD among qualified internal applicants and/or selectees for promotions to supervisory positions.</p>																		
<p>STATEMENT OF BARRIER GROUPS:</p>	<p><i>Barrier Group</i></p> <p>People with Disabilities</p>																		
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<p>STATEMENT OF IDENTIFIED BARRIER:</p> <p>Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.</p>	<p>N/A</p>																		
<p>Objective</p>	<p>Obtain applicant flow data for Qualified Internal Applicants.</p> <table border="1" data-bbox="446 934 1502 1081"> <tr> <td data-bbox="446 934 649 997">Date Objective Initiated</td> <td data-bbox="649 934 1502 997">Sep 30, 2019</td> </tr> <tr> <td data-bbox="446 997 649 1081">Target Date For Completion Of Objective</td> <td data-bbox="649 997 1502 1081">Sep 30, 2020</td> </tr> </table>				Date Objective Initiated	Sep 30, 2019	Target Date For Completion Of Objective	Sep 30, 2020											
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<p>Fiscal Year</p>	<p>Accomplishments</p>																		

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

Program is understaffed.

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

Still working on identifying the barriers that exist.

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

N/A