

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

GS-11 to SES cluster is 7.70 percent, which is well below the 12% goal. Last year's cluster was 7.02 percent.

*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 Yes

b. Cluster GS-11 to SES (PWTD)

Answer Yes

GS-1 to GS-10 cluster is 1.51 percent (last year was 1.79 percent), which is slightly below the 2% goal. GS-11 to SES cluster is 0.63 percent (last year was 0.62), which is well below the 2% goal.

Grade Level Cluster(GS or Alternate Pay Planb)	Total	Reportable Disability		Targeted Disability	
	#	#	%	#	%
Numerical Goal	--	12%		2%	
Grades GS-1 to GS-10	8722	865	9.92	98	1.12
Grades GS-11 to SES	54354	4111	7.56	342	0.63

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

Managers are informed of the Federal goals for PWD and PWTD annually.

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

There are three (3) Reasonable Accommodation Coordinators and one (1) Supervisory Reasonable Accommodation Coordinator in the Privacy and Diversity Office (PDO). Implementation of the initiative includes the following areas: 1. PDO currently has two (2) vacant positions that need to be filled. This upcoming fiscal year will focus on ensuring full employment of the reasonable accommodation team. Once full staffing is obtained, PDO anticipates it will have sufficient qualified personnel to implement its 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 reasonable accommodation requests from applicants and employees	3	0	24	Michael Brenyo Director, Reasonable Accommodation Team, PDO HRM, CBP Hiring Center
Section 508 Compliance	2	0	0	Timothy.Monaghan@cbp.d
Answering questions from the public about hiring authorities that take disability into account	0	0	24	HRM, CBP Hiring Center
Architectural Barriers Act Compliance	1	0	0	Eric.P.Eldridge@cbp.dhs.g OFAMTaskings@cbp.dhs.g
Processing applications from PWD and PWTD	0	0	24	Darius.D.Carrol@cbp.dhs.g
Special Emphasis Program for PWD and PWTD	1	0	0	Darlene.M.Sedwick@cbp.d

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

Answer Yes

Three (3) Reasonable Accommodation Coordinators and one (1) supervisory Reasonable Accommodation Coordinator in PDO continued to receive on-the-job training during FY 2020. This included training in following areas: conducting intake of reasonable accommodation requests, processing reasonable accommodation within CBP, conducting interactive dialogues, and record keeping in Microsoft Sharepoint, which CBP uses to track reasonable accommodation requests. In accordance with Executive Order 13548, HR personnel are required to complete disability training. CBP Human Resources staff plans to continue providing Schedule A education sessions and promoting webinars on various subjects on disability employment. The Hiring Center created an SOP to help

our staff identify the process and steps taking to review, qualify, and consider Person with Disabilities.

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

Pursue and investigate the establishment of a Reasonable Accommodation Central Fund; proactively plan for vacancies and potential shifts in the composition and increasing workload of Disability Program staff; initiate requests for personnel action; in addition to full-time employment opportunities, announce part-time and job sharing opportunities to bolster Disability Program staff; make a request to use hiring flexibilities when a critical hiring need or severe shortage of candidates exists in the disability program. Explore the possibility of detailing individuals to the disability program to assist with workload. Although funding has been provided to participate in recruitment events, requests to fund advertising in diversity/disability magazines and online sites have been recommended to promote CBP as an employer of choice for persons with disabilities.

Section III: Program Deficiencies In The Disability Program

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.
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)]

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 SPPC is an HR Specialist (Recruitment and Placement) who monitors a central mailbox dedicated to the Agency’s Selective Placement Program. CBP continues to conduct e-Recruiting and outreach to career services and vocational rehabilitation offices on college campuses throughout the country providing them with both Pathways and selective placement program information. CBP ensures awareness of the Departments of Labor and Defense Workforce Recruitment Program database by sending annual mass emails to its supervisors reminding them to use the database as a tool to recruit students/graduates with disabilities. HR staff also educates program offices on the use of nonpaid internships (through the vocational rehabilitation agencies) as a means of hiring PWD. The SPP mailbox is now geared to help applicants understand their eligibilities, what positions are aligned with their skills and abilities, resume writing, and an understanding of CBP’s hiring process. The mailbox allows the applicant to speak one on one with a highly trained Specialist to field any questions or concerns of the applicant. This day-to-day interaction with applicants and thorough assessment of the program highlights CBP’s commitment to the recruitment and hiring of Persons with Disabilities.

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

CBP appointed 62 Schedule A hires in FY 2020. Employees hired with a targeted disability increased from 14 in FY 2019 to 26 in

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.

The Selective Placement Program Coordinator (SPPC) is a Lead HR Specialist (Recruitment and Placement) who monitors a central mailbox dedicated to the Agency's Selective Placement Program. CBP continues to conduct e-Recruiting and outreach to college career services offices and vocational rehabilitation agencies throughout the country, providing them with both Pathways and selective placement program information. CBP ensures awareness of the Departments of Labor and Defense Workforce Recruitment Program database by sending annual mass emails to its supervisors, reminding them to use the database as a tool to recruit students/graduates with disabilities. HR staff also educates program offices on the use of Schedule A and nonpaid internships (through the Department of Veterans Affairs and vocational rehabilitation agencies) as a means of hiring PWD.

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

CBP added the Roadmap to Success: Hiring, Retaining and Including People with Disabilities course added into its training system as a mandatory course for all supervisors and HR staff. The CBP Hiring Center holds an annual hiring workshop and promotes the use of Schedule A to CBP Program Offices.

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.

In FY 2020, CBP maintained its outreach to colleges and vocational rehabilitation agencies throughout the country. CBP has an ongoing relationship with National Recruitment who organizes college job fairs and webinars to recruit potential candidates. The Hiring Center in partnership with National Recruitment hosted a webinar in October 2019 to highlight the Selective Placement Program and recruit persons with disabilities and students to several job announcements that were advertised exclusively for the webinar.

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 Yes

b. New Hires for Permanent Workforce (PWTD) Answer Yes

There were triggers for new hires of PwD in the permanent workforce: 11.73 percent is below the 12 percent goal. There were triggers for new hires of PwTDs in the permanent workforce: 0.56 percent is below the 2 percent goal.

New Hires	Total	Reportable Disability		Targeted Disability	
		Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce

	(#)	(%)	(%)	(%)	(%)
% of Total Applicants	45070	6.82	0.00	0.92	0.00
% of Qualified Applicants	18104	7.17	0.00	0.75	0.00
% of New Hires	336	8.04	0.00	0.30	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

None of the 30 hires to series 1801 were PWTD, which is below the benchmark of 1.31% PWTD among the qualified applicants. 4.14% of the 145 hires to series 1895 were PWD, which is below the benchmark of 6.93% PWD among the qualified applicants. None of the 145 hires to series 1895 were PWTD, which is below the benchmark of 0.49% PWTD among the qualified applicants. 2.78% of the 144 hires to series 1896 were PWD, which is below the benchmark of 5.74% PWD among the qualified applicants. None of the 144 hires to series 1896 were PWTD, which is below the benchmark of 0.67% PWTD among the qualified applicants. Please note that the majority of CBP’s MCOs have established physical requirements which results in a qualified applicant pool of PWDs and PWTDs that is below the Federal goal benchmarks.

New Hires to Mission-Critical Occupations	Total (#)	Reportable Disability		Targetable Disability	
		Qualified Applicants (%)	New Hires (%)	Qualified Applicants (%)	New Hires (%)
Numerical Goal	--	12%		2%	
0401AGRICULTUR SPECIALIST	0	0.00	0.00	0.00	0.00
1801INVESTIGATC	23	1600.00	65.22	200.00	0.00
1881AIR INTERDICTION AGENT	0	0.00	0.00	0.00	0.00
1889IMPORT SPECIALIST	4	650.00	50.00	175.00	25.00
1895CBP OFFICER	27	1825.93	22.22	129.63	0.00
1896BORDER PATROL AGENT	15	2740.00	26.67	320.00	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

PWDs and PWTDs are selected at similar rates to the relevant applicant pool for internal applicants. However, it should be noted that the majority of CBP’s MCOs have established physical requirements which results in lower participation rates of PWDs and PWTDs in these occupations. PwD Triggers: 0401: 1.05% vs 3.79% 1801: 9.52% vs 16.09% 1881: 0% vs 12.97% 1889: 3.85% vs 17.60% PwTD Triggers: 0401: 0.42% vs 0.83% 1881: 0% vs 0.33%

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

None of the 59 promotions to series 0401 were PwTD, which is below the benchmark of 0.42 percent PwTD among the qualified applicants. 5.45% of the 165 promotions to series 1801 were PwD, which is below the benchmark of 9.52 percent PwD among the qualified applicants. 0.61% of the 165 promotions to series 1801 were PwTD, which is below the benchmark of 2.61 percent PwTD among the qualified applicants. 3.62% of the 387 promotions to series 1895 were PwTD, which is below the benchmark of 8.76 percent PwTD among the qualified applicants. 0.52% of the 387 promotions to series 1895 were PwTD, which is below the benchmark of 0.64 percent PwTD among the qualified applicants. 2.54% of the 788 promotions to series 1896 were PwTD, which is below the benchmark of 7.45 percent PwTD among the qualified applicants. 0.13% of the 788 promotions to series 1896 were PwTD, which is below the benchmark of 0.55 percent PwTD among the qualified applicants. Please note that the majority of CBP's MCOs have established physical requirements which results in a qualified applicant pool of PWDs and PWTDs that is below the Federal goal benchmarks.

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.

Although there is no formal advancement program plan specifically for PWDs, including PWTDs, CBP program offices regularly promote their career opportunities for both competitive promotions and details to Agency staff via its CBP Postmaster distribution.

B. CAREER DEVELOPMENT OPPORTUNITES

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

The CBP Mentoring Program allows all CBP employees to navigate challenging career opportunities and develop well-balanced work and personal lives through mentoring relationships. The program connects experienced personnel with those looking for advice and discussion, and facilitates self-directed learning through the sharing of institutional and personal knowledge. In the three years since the program launched, more than 2,800 mentees have participated, and over 2,600 mentors have volunteered their time to give back to CBP and its employees. The program also includes a training plan so that the progress of new employees can be monitored for performance milestones.

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 (%)
Mentoring Programs		4759				
Internship Programs						
Fellowship Programs						

Career Development Opportunities	Total Participants		PWD		PWTD	
	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Coaching Programs						
Training Programs						
Detail Programs						
Other Career Development Programs						

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

a. Applicants (PWD) Answer No

b. Selections (PWD) Answer No

CBP does not currently have any reportable career development programs as currently defined under MD-715.

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

a. Applicants (PWTD) Answer No

b. Selections (PWTD) Answer No

CBP does not currently have any reportable career development programs as currently defined under MD-715.

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

Based on a review of MD-715 Table B9-2: Employee Recognition and Awards – Distribution by Disability, PWD and PWTD are not receiving awards at expected rates when compared to the inclusion rate for the following categories: • Time Off Awards: o 11 – 20 Hours: PWD Inclusion Rate 4.95%; PWTD: 2.44%. All employees: 5.38%. o 21 – 30 Hours: PWD Inclusion Rate 4.26%; PWTD: 3.56%. All employees: 4.90%. • Cash Awards: o \$1,000 - \$1,999: PWD Inclusion Rate 41.07%; PWTD: 32.89%; All employees: 52.99% o \$3,000 - \$3,999: PWD Inclusion Rate 3.33%; PWTD: 4.22%; All employees: 5.55%.

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	1708	4.63	2.49	4.23	4.67
Time-Off Awards 1 - 10 Hours: Total Hours	14135	36.40	20.88	31.63	36.87
Time-Off Awards 1 - 10 Hours: Average Hours	8.28	0.16	0.02	1.66	0.01

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 11 - 20 hours: Awards Given	3419	4.96	5.50	2.45	5.21
Time-Off Awards 11 - 20 Hours: Total Hours	48590	79.65	77.08	40.76	83.44
Time-Off Awards 11 - 20 Hours: Average Hours	14.21	0.32	0.03	3.71	-0.01
Time-Off Awards 21 - 30 hours: Awards Given	3114	4.27	5.02	3.56	4.34
Time-Off Awards 21 - 30 Hours: Total Hours	76468.5	106.55	123.15	85.52	108.59
Time-Off Awards 21 - 30 Hours: Average Hours	24.56	0.49	0.04	5.35	0.02
Time-Off Awards 31 - 40 hours: Awards Given	734	3.95	0.84	5.79	3.78
Time-Off Awards 31 - 40 Hours: Total Hours	26138	146.05	29.49	212.69	139.56
Time-Off Awards 31 - 40 Hours: Average Hours	35.61	0.73	0.06	8.18	0.00
Time-Off Awards 41 or more Hours: Awards Given	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Total Hours	0	0.00	0.00	0.00	0.00
Time-Off Awards 41 or more Hours: Average Hours	0	0.00	0.00	0.00	0.00

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$501 - \$999: Awards Given	9380	16.59	14.77	20.27	16.23
Cash Awards: \$501 - \$999: Total Amount	6521415.26	11588.26	10261.02	14502.26	11304.32
Cash Awards: \$501 - \$999: Average Amount	695.25	13.81	1.24	159.37	-0.37
Cash Awards: \$1000 - \$1999: Awards Given	33654	41.17	55.27	32.96	41.97
Cash Awards: \$1000 - \$1999: Total Amount	54903963.34	60915.53	90932.98	46633.93	62307.12
Cash Awards: \$1000 - \$1999: Average Amount	1631.42	29.26	2.94	315.09	1.41
Cash Awards: \$2000 - \$2999: Awards Given	6553	15.03	9.97	21.60	14.39
Cash Awards: \$2000 - \$2999: Total Amount	15051283.15	34830.69	22835.38	51344.27	33221.62
Cash Awards: \$2000 - \$2999: Average Amount	2296.85	45.83	4.10	529.32	-1.28
Cash Awards: \$3000 - \$3999: Awards Given	3526	3.34	5.92	4.23	3.26
Cash Awards: \$3000 - \$3999: Total Amount	12038542.5	11702.82	20181.27	14876.28	11393.60
Cash Awards: \$3000 - \$3999: Average Amount	3414.22	69.25	6.10	782.96	-0.30
Cash Awards: \$4000 - \$4999: Awards Given	322	0.89	0.47	0.89	0.89
Cash Awards: \$4000 - \$4999: Total Amount	1384759.79	3848.90	2001.90	3963.89	3837.70
Cash Awards: \$4000 - \$4999: Average Amount	4300.5	85.53	7.67	990.97	-2.69

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$5000 or more: Awards Given	97	0.18	0.14	0.67	0.13
Cash Awards: \$5000 or more: Total Amount	521270.26	919.05	775.69	3340.76	683.08
Cash Awards: \$5000 or more: Average Amount	5373.92	102.12	9.70	1113.59	3.56

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 Yes

PWTD Inclusion Rate 0%; All employees: 0.30%

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	118	0.10	0.19	0.00	0.11

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

This information is not currently tracked and would include smaller programs at a local level.

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 No

ii. Internal Selections (PWD) Answer No

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
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ii. Internal Selections (PWD)	Answer	Yes
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Note: The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements. a. No positions advertised. b. PWDs accounted for 2.79% of qualified internal applications, which was below the relevant applicant pool of 10.08%. None were selected out of 86 selections, which is below the benchmark. c. PWDs accounted for 2.94% of qualified internal applications, which was below the relevant applicant pool of 9.55%. Selectees were 1.56% PWD, which is below the benchmark. d. PWDs accounted for 2.31% of qualified internal applications, which was below the relevant applicant pool of 5.98%. Selectees were 1.56% PWD, which is below the benchmark.

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

a. SES

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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b. Grade GS-15

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	No
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c. Grade GS-14

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	Yes
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d. Grade GS-13

i. Qualified Internal Applicants (PWTD)	Answer	No
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ii. Internal Selections (PWTD)	Answer	Yes
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Note: The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements a. No positions advertised. b. N/A. c. PWTDs accounted for 0.44% of selections, which was below the qualified applicant pool of 1.08%. d. PWTDs accounted for 0.44% of selections, which was below the qualified applicant pool of 1.05%.

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

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

Answer No

Note: The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements a. No positions advertised. b. No new GS-15 hires were PWDs, which is below the qualified applicant pool of 8.03%. c. 7.32% of new GS-14 hires were PWDs, which is below the qualified applicant pool of 7.50%.

4. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB)

Answer No

b. New Hires to GS-15 (PWTB)

Answer Yes

c. New Hires to GS-14 (PWTB)

Answer No

d. New Hires to GS-13 (PWTB)

Answer No

a. No positions advertised. b. No new GS-15 hires were PWTBs, which is below the qualified applicant pool of 3.25%.

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 No

Note: The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements. a. PWDs accounted for 2.58% of qualified internal applicants, which was below the relevant applicant pool of 10.26%. None were selected out of 85 selections, which is below the benchmark. b. PWDs accounted for 1.44% of qualified internal applicants, which was below the relevant applicant pool of 6.90%. PWDs accounted for 0.93% of selections, which is below the benchmark. c. PWDs accounted for 11.35% of qualified internal applicants, which was below the relevant applicant pool of 13.04%.

6. Does your agency have a trigger involving PWTB 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 (PWTB)	Answer	No
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ii. Internal Selections (PWTB)	Answer	No
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b. Managers

i. Qualified Internal Applicants (PWTB)	Answer	No
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ii. Internal Selections (PWTB)	Answer	Yes
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c. Supervisors

i. Qualified Internal Applicants (PWTB)	Answer	No
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ii. Internal Selections (PWTB)	Answer	No
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Note: The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements. a. N/A. b. PWTBs accounted for 0.59% of qualified internal applicants, which was above the relevant applicant pool of 0.54%. PWTBs accounted for 0.47% of 858 selections, which is below the benchmark. c. N/A

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 (PWTB)	Answer	No
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b. New Hires for Managers (PWTB)	Answer	No
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c. New Hires for Supervisors (PWTB)	Answer	No
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Note: There were too few selections and qualified applicants with disabilities based on fiscal year 2020 applicant flow data. The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements.

8. Using the qualified applicant pool as the benchmark, does your agency have a trigger involving PWTB 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 (PWTB)	Answer	No
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b. New Hires for Managers (PWTB)	Answer	No
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c. New Hires for Supervisors (PWTB)	Answer	No
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Note: There were too few selections and qualified applicants with targeted disabilities based on fiscal year 2020 applicant flow data. The applicant flow data below reflects all certificates that were audited in FY 2020 and may not reflect all applications or selections for FY 2020 announcements.

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

In FY 2020, CBP converted 66.29 percent (59 of 89) of its Scheduled A employees who were eligible. CBP HR staff notifies the supervisors of those eligible biyearly to remind them of the employee's eligibility. At that time, management may inform HR that they require more time to observe the employee's performance before requesting conversion to a permanent position.

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

a. Voluntary Separations (PWD)

Answer Yes

b. Involuntary Separations (PWD)

Answer Yes

Voluntary Separations: (Resignation, Retirement, Other) The inclusion rate for PWD who voluntarily separated among PWD is 6.31%, which is higher than the inclusion rate for PWOD of 3.33%. Involuntary: (RIF, Removal) The inclusion rate for PWD who involuntarily separated among PWD is 0.70%, which is higher than the inclusion rate for PWOD of 0.38%.

Separations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	253	0.66	0.37
Permanent Workforce: Resignation	585	1.59	0.86
Permanent Workforce: Retirement	1283	2.93	1.93
Permanent Workforce: Other Separations	378	1.51	0.51
Permanent Workforce: Total Separations	2499	6.69	3.68

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

a. Voluntary Separations (PWTD)

Answer Yes

b. Involuntary Separations (PWTD)

Answer Yes

Voluntary Separations: (Resignation, Retirement, Other) The inclusion rate for PWTD who voluntarily separated among PWTD is 6.21%, which is higher than the inclusion rate for PWOTD of 3.55%. Involuntary: (RIF, Removal) The inclusion rate for PWTD who involuntarily separated among PWTD is 1.11%, which is higher than the inclusion rate for PWOTD of 0.40%.

Separations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	253	1.11	0.39
Permanent Workforce: Resignation	585	0.89	0.92
Permanent Workforce: Retirement	1283	4.88	1.99
Permanent Workforce: Other Separations	378	0.44	0.59
Permanent Workforce: Total Separations	2499	7.32	3.90

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.

Based on previous assessments of exit surveys (fiscal years 2012 through 2016) and separations, a majority of separations of PWDs were due to retirement.

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.

<https://www.cbp.gov/site-policy-notice/accessibility>

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

At this time, there is no link on the CBP public website explaining employees' and applicants' rights under the Architectural Barriers Act, including a description of how to file a complaint.

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.

1. Requirements - All CBP space is adequately accessible where applicable. Accessibility requirements for some spaces may be waived based on access limited to able-bodied CBP officers. In general, Accessibility shall be provided, except where the requirements are in conflict with the security or mission-critical functions of CBP-controlled spaces. 2. Policies and Practices – The following are areas that CBP is currently engaged in the active enforcement of the Architectural Barriers Act (ABA): a. Design Standards - General statement in its facility as follows: The Architectural Barriers Act Accessibility Standard (ABAAS), 36 C.F.R. Part 1191, Appendices C and D, applies to Federal construction begun after May 8, 2006. b. Statement of Work (SOW) – Current SOW's contain accessibility requirements for all new construction and renovation projects. c. Facility Condition Assessments – Reports ADA deficiencies or if additional studies are required d. GSA Support – GSA requires all designs and renovations to comply with ABA standards. e. Team Members – CBP has employed Architects with skill sets to support and review compliance of ABA standards on our projects. Programs, policies, and practices include: • The U.S. Border Patrol and AMO Facility Design Standards cite required compliance with the ABA, as appropriate, considering exceptions cited in ABA section 203. • The CBP Design Standards for Field Operations Facilities cite the ABA, and require compliance with the ABA as appropriate, while also considering exceptions cited in ABA section 203. • SOWs for operational services, maintenance contracts, and construction contracts include requirements for compliance with the ABA. • The Facility Condition Assessment program requires assessment and reporting of ABA non-compliance as deficiencies for each facility. ABA non-compliance is reported as an opportunity for corrective action within the TRIRIGA facility management system, and acted on as part of the funding allocation for repair projects. • OFAM conducts annual portfolio investment reviews to identify facility sustainment and operational requirements, to include those involved accessibility compliance and improved accessibility components. The list of improvement projects is extensive. OFAM registered architects review each executed project for code and ABA compliance. Approval of each project is required by the position description of the Chief Architect. • OFAM provides immediate response and corrective action for requests or complaints received. • All new construction and renovation/alteration projects in the National Capital Region include applicable code requirements for accessibility to include modifications needed for any specific reasonable accommodation to support specific employees. Renovations to restrooms within the RRB, specifically the 2nd Floor Restroom, will include updated accessibility features.

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.)

51.2 days, for 223 processed requests.

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.

Applicant accommodation requests are processed within approximately one business day. There were increasing efforts to provide CBP Reasonable Accommodation Interactive Process for Supervisors and Managers Training via both in-person and webinar capabilities during FY 2020.

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.

CBP did not receive any PAS requests during FY 2020.

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 Yes

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

Corrective measures included: • Engaging in the interactive process with the Complainant and providing a reasonable accommodation; • Conduct a supplemental investigation on compensatory damages; • Pay compensatory damages; • Training; • Consider taking discipline against responsible officials (final decision pending); • Opportunity for attorney's fees; and, • Posting notice for 60 days.

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 Yes

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

Corrective measures included: • Training; • Consider taking discipline against the responsible officials (pending final decision); • Conduct a supplemental investigation on compensatory damages; • Opportunity and payment for compensatory damages; • Opportunity for attorney's fees; and • Posting notices for 60 days.
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Section VIII: Identification and Removal of Barriers

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

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

Answer Yes

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

Answer Yes

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

Source of the Trigger:	Other					
Specific Workforce Data Table:	Workforce Data Table - B1					
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	RA processing time frames.					
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities					
Barrier Analysis Process Completed?:	Y					
Barrier(s) Identified?:	Y					
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Practice - Issuing Decisions		Description of Policy, Procedure, or Practice Practice – Managers are not documenting or issuing decisions in a timely manner.			
Objective(s) and Dates for EEO Plan						
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description	
01/01/2018	06/30/2019	Yes	06/30/2020		To issue written determinations in a timely manner.	
Responsible Official(s)						
Title		Name		Standards Address The Plan?		
(A) Director, Diversity and EEO		Darlene Sedwick		No		
Planned Activities Toward Completion of Objective						
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date	Completion Date
03/30/2018	Conduct internal systematic review of policy, procedures, and practices for bottlenecks (i.e. establish specific time frames for review)			Yes		03/30/2018
06/30/2018	Update agency policies and MOUs, and responsible roles. May include potential negotiations with unions (i.e. Adopt simplified forms to replace template letters and automate processing for Decision maker).			Yes	09/30/2019	
09/30/2018	Submit for program office review and concurrence.			Yes	12/31/2019	

Planned Activities Toward Completion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
12/31/2018	Communication Plan.	Yes	02/28/2020	
06/30/2019	Provide training to managers and supervisors	Yes	06/30/2020	
Report of Accomplishments				
Fiscal Year	Accomplishment			
2018	Conducted internal systematic review of policy, procedures, and practices for bottlenecks (i.e. establish specific time frames for review) and identified need for additional Reasonable Accommodation Coordinators to address backlog.			
2018	An additional Reasonable Accommodation Coordinator was brought onboard in August 2018. An additional Reasonable Accommodation Coordinator is expected to be brought onboard in early in FY 2019.			

Source of the Trigger:	Other				
Specific Workforce Data Table:	Workforce Data Table - B1				
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER: Provide a brief narrative describing the condition at issue. How was the condition recognized as a potential barrier?	The CBP Request For Reasonable Accommodation Form was not fully accessible to all users. Note: Trigger was identified during an internal review of policies, procedures, and practices.				
STATEMENT OF BARRIER GROUPS:	<i>Barrier Group</i> People with Disabilities				
Barrier Analysis Process Completed?:	Y				
Barrier(s) Identified?:	Y				
STATEMENT OF IDENTIFIED BARRIER: Provide a succinct statement of the agency policy, procedure or practice that has been determined to be the barrier of the undesired condition.	Barrier Name Reasonable Accommodation Request Forms		Description of Policy, Procedure, or Practice Reasonable Accommodation request forms were not fully accessible.		
Objective(s) and Dates for EEO Plan					
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description
01/01/2018	06/30/2018	Yes	04/01/2018	08/15/2018	To provide fillable documentation to those with roles and responsibilities in the CBP Reasonable Accommodation Process.
Responsible Official(s)					
Title		Name		Standards Address The Plan?	
(A) Director, Diversity and EEO		Darlene Sedwick		Yes	
Planned Activities Toward Completion of Objective					
Target Date	Planned Activities			Sufficient Staffing & Funding?	Modified Date
03/30/2018	Conduct an internal systematic review of policy, procedures, and practices for bottlenecks (i.e. establish specific time frames for legal review).			Yes	03/30/2018
06/30/2018	Update forms as necessary to ensure Section 508 compliance.			Yes	08/15/2018

Report of Accomplishments	
Fiscal Year	Accomplishment
2018	Conducted a review of forms and identified necessary updates to ensure Section 508 compliance.
2018	Updated reasonable accommodation request forms/documents to ensure Section 508 compliance.

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

Staffing turnover and required coordination across organizational elements.

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

A review of policies, procedures, and practices identified need for additional Reasonable Accommodation Coordinators to address the backlog in reasonable accommodation requests based on a disability.

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.

Agency policies are currently under review for revision and planned for completion by the end of FY 2020.