### 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.

Answer

Answer

No

Yes

a. Cluster GS-1 to GS-10 (PWD)

b. Cluster GS-11 to SES (PWD)

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 25.11% in FY 2020, which indicates that ICE does not have a trigger in the GS-1 to GS-10 cluster. 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 11.53% in FY 2020. ICE experienced a 0.5% increase in the PWD representation in GS-11 to SES during FY 2020, however, PWD representation remains below the benchmark. The increase noted in PWD representation in the GS-11 to SES is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. Further analysis indicates that the U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees, of whom 167 are LEOs and 180 non-LEOs that self-identified as PWD in the GS-11 to SES Cluster. The physical requirements of the Law Enforcement positions at ICE has, and will continue to hamper ICE's ability to attain a Law Enforcement PWD presence of 12% in the GS-1 to GS-10 and the GS-11 to SES clusters.

\*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 U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845, of which 218 are Persons With Targeted Disabilities. Further analysis of the ICE Workforce Data indicates that 3 LEOs and 44 non-LEOs self-identified as PWTDs in Cluster GS-1 to GS-10. 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 0.90% in FY 2020, which falls below the benchmark, thus has a trigger in regard to the GS-11 to SES Cluster was 2.78% in FY 2020, which indicates that ICE does not have a trigger in the GS-10 Cluster. ICE continues to demonstrate their ability to meet the PWTD goal as the Disability Team diligently engages with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. The physical requirements of the Law Enforcement positions at ICE has, and will continue to, hamper

ICE's ability to attain a Law Enforcement PWTD presence of 2% in the GS-1 to GS-10 and the GS-11 to SES clusters.

Grade Level Cluster(GS or Alternate Pay	Total	Reportable Disability		Targeted Disability		
Planb)	#	#	%	#	%	
Numarical Goal		12%		12% 2%		%
Grades GS-1 to GS-10	1836	461	25.11	51	2.78	
Grades GS-11 to SES	17978	2072	11.53	162	0.90	

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 (OHC) training regarding special hiring authorities. Additionally, the annual 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 2020 the Disability Program staff consisted of a Disability Program Manager and two Reasonable Accommodation Coordinators. The Disability Program at ICE includes facilitating the Reasonable Accommodation Program, Personal Assistance Services Program, Architectural Barriers initiatives to identify barriers, 508 Compliance barrier identification and resolution, provision of customized training across the Agency, as well as the establishment and monitoring of contracts to meet the needs of employees with disabilities. The Disability Team accomplished a tremendous number of objectives this year, including reducing the number of processing days, and providing numerous sessions of customized reasonable accommodation training, resurveying the workforce, and initiating disability-related initiatives. However, due to the limited number of Disability Team members, ICE was unable to process RA requests within the parameters established in the ICE RA procedures. ODCR is also leveraging contractual staff to assist with data management, data analysis projects, 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.

	# of FTE	Responsible Official		
Disability Program Task	Full Time	Part Time	Collateral Duty	(Name, Title, Office Email)
Section 508 Compliance	0	0	0	Arva Parker, IT Specialist, ICE Section 508 Coordinator, Arva.Parker@ice.dhs.gov

Disskility Drossow Tosle	# of FTI	E Staff By Employm	ent Status	Responsible Official (Name, Title, Office
Disability Program Task	Full Time	Part Time	Collateral Duty	Email)
Processing reasonable accommodation requests from applicants and employees	0	0	0	-
Processing applications from PWD and PWTD	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
Architectural Barriers Act Compliance	0	0	0	Lynn Dickson, Disability Program Manager, Lynn.M.Dickson@ice.dhs.≰
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.§
Special Emphasis Program for PWD and PWTD	0	0	0	Natahsa Tyler, Special Emphasis Program Manager, Natahsa.Tyler@ice.dhs.gov

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

Answer Yes

ODCR provided training for all Disability Program team members to bolster their knowledge and skills for responding to reasonable accommodation requests. During FY 2020, the Reasonable Accommodation Coordinators attended the EEOC Excel Conference. The Disability Program manager attended the Federal Dispute Resolution (FDR) Training conference and participated in Federal Exchange on Employment and Disability meetings. Additionally, the Disability Program Manager provided weekly training for the Reasonable Accommodation 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 Yes

The ICE Central Accommodation Fund (CAF) was established in FY 2016 and remains in place. It continues to be sufficiently funded to meet the accommodation needs of ICE employees and applicants for employment. During FY2020 ICE also established contracts to provide services for Deaf/HOH/Blind, Personal Assistance Services, and an Interagency Agreement for ergonomic assessments. Additionally, during FY 2020 ICE initiated two additional contract packets to provide services for the ICE workforce. Additionally, the Disability Program receives support from our current contractors. The contractors assist with data management, data analysis projects, and other projects in support of the Disability Program. Office of the Chief Information Officer, Solutions Delivery Division is reviewing available solutions to assist the Disability Team with data analysis of the Career Development information in support of the MD-715 Part J requirement. The Department of Defense, Computer/Electronic Accommodation Program (CAP) received seventeen accommodation requests from ICE employees, as of June 2020. CAP granted nine (9) of the requests, which represents an expenditure of approximately \$1500.00 from CAP on behalf of ICE employees for FY 2020. ICE will conduct further analysis of the FY 2020 requests submitted to CAP and CAPs financial expenditure on behalf of ICE, upon receipt of the FY 2020 final report. CAP received and granted eighteen accommodation requests from ICE employees during FY 2019. The provision of these accommodations represents an expenditure of \$22,321.11 on behalf of ICE employees for FY 2019. The Disability Team is preparing to receive an increased number of RA requests, due to CAPs change in scope for FY 2020. Beginning October 1, 2020 ICE employees can no longer request accommodations via CAP. Additionally, ICE is prepared to absorb the cost of providing these accommodations via the Agency's Centralized Fund for FY 2021.

Brief Description of Program Deficiency	Employment Program	.4.a.8. to effectively administer its special emphasis programs (such as, Federal Women's Program, Hispanic mployment Program, and People with Disabilities Program Manager)? [5 USC § 7201; 38 USC § 4214; 5 CFR § 20.204; 5 CFR § 213.3102(t) and (u); 5 CFR § 315.709]				
Objective		o obtain appropriate funding and qualified staffing to allow for proper management of the Federal Vomen's Program and the Hispanic Employment Program, to comply with the CFR.				
Target Date	Sep 30, 2022					
<b>Completion Date</b>						
	Target Date	Completion Date	<u>Planned Activity</u>			
	Feb 1, 2020	June 30, 2020	ODCR will launch the Primary Special Emphasis Program Manager (P- SEPM) for Women's Employment Program and Hispanic Employment Program			
Planned Activities	Feb 1, 2020	August 15, 2020	Published announcement requesting applicants for the P-SEPM role as other duties assigned			
	Feb 1, 2020	September 25, 2020	Identify and select the P-SEPMs			
	Sep 30, 2021		At monthly update meetings, ODCR leadership will continue to advise ICE senior leadership on the impact of the continuing lack of sufficient staffing during monthly update meetings.			
	Fiscal Year	<u>Accomplishment</u>				
Accomplishments	2020	representatives for role is a function	ly identified two Special Emphasis Program Managers as r Women's Employment Program and Hispanic Program. This in addition to the employees normal duty requirements and are o work in this area at 20%.			

### Section III: Program Deficiencies In The Disability Program

DHS Immigration and Cust Enforcement	FY 2020
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 reason accommodation		requests within the timeframe set forth in ICE reasonable
Target Date	Mar 20, 2021		
Completion Date			
	Target Date	Completion Date	<u>Planned Activity</u>
	Sep 30, 2019	September 30, 2019	Provide updated plan to senior staff for consideration.
	Sep 30, 2019	September 30, 2019	Review the current staffing plan and submit requests to fill vacant positions.
	Sep 30, 2019	September 30, 2019	Coordinate with the Contract Project Manager to facilitate the assignment of RA projects to available contractors.
	Dec 31, 2019	December 31, 2019	Revise ODCR internal Standard Operating Procedure (SOP) and templates for processing RA requests to align with providing supervisors with decision making authority.
Planned Activities	Feb 28, 2020	March 30, 2020	With the assistance of outside facilitators, the Diversity Management Division will engage in a series of process-mapping activities to identify weaknesses and undue delays in the RA process.
	Mar 30, 2020	February 28, 2020	Initiate a plan to review the ICE Reasonable Accommodation procedures to gain internal efficiencies.
	Apr 30, 2020	April 30, 2020	Update the ICE Reasonable Accommodation procedures in accordance with results from the process mapping.
	Jun 30, 2020	June 30, 2020	Assess reasonable accommodation system requirements to identify bottlenecks and ascertain whether additional tracking mechanisms are required.
	Mar 30, 2021		Receive final approval of the ICE RA procedures.
Accomplishments			

<u>Fiscal Year</u>	Accomplishment
2020	Modification to Target Date: The number of RA cases processed timely in FY 2019 increased by 11 percent in comparison with FY 2018. While this is a noteworthy accomplishment, additional time and tasks are needed in order for the RA team to process all RA requests within the timeframes established in the ICE Reasonable Accommodations procedures. The reasonable accommodation team reduced the average number of processing days from 238 in FY 2018, to 38 days in FY 2020. As a result of the reduced number of processing days, 48% of all reasonable accommodation requests were processed within the timeline stipulated in the ICE Reasonable Accommodation procedures. In order to continue working on these tasks, the target date is modified from September 30, 2020, to March 30, 2021. Accomplishments: During FY 2019, the ICE Reasonable Accommodation reates yeas monitored and revised to gather pertinent information for the MD-715 – Part J. For example, name of the decision-maker, date(s) medical documentation was requested/received, tracking of purchases, purchase costs, and detailed information related to recurring requests have been captured throughout the year. Additionally, data not needed for completion of the MD-715 or internal ICE reports is no longer tracked on the internal tracking system. This revision reduced the anount of time spent gathering data for the MD-715 and resulted in a reduction in the average number of processing days, case processing days were reduced on average by 23.55 days per case during FY 2019. The reasonable accommodation team continued to streamline and update the ODCR internal tracking system during FY 2020. Additionally, market research and benchmarking were conducted to identify available reasonable accommodation and personal assistive services request, processing days, cost and provide enhanced data management and reporting options. During the benchmarking and market research the need for a reasonable accommodation software program was identified and the acquisition proces was implemented.

Brief Description of Program Deficiency			iews or surveys that include questions on how the agency could improve the d advancement of individuals with disabilities? [see 29 CFR §1614.203(d)(1)
Objective	Obtain informati improve the recr	on that aids ICE in uitment, hiring, incl	creating strategies and tools to institute ways for agency to lusion, retention and advancement of disabilities.
Target Date	Sep 30, 2021		
Completion Date			
	<u>Target Date</u>	Completion Date	Planned Activity
	Dec 15, 2018	December 15, 2019	ODCR will initiate a review of the exit interview survey instrument to capture data points for future assessment.
	Jan 6, 2020	January 6, 2020	ODCR will contact the Office of Human Capital (OHC) to identify best method(s) for securing information from the exit interview survey.
Planned Activities	Mar 31, 2021		Schedule a meeting with the new National Recruitment and Retention manager to discuss a repurposing of the Exit Interview to elicit information from employees departing the agency regarding race, disability, age, etc.
	Apr 30, 2021		Develop questions related to race, disability, age, etc., to be included in the repurposed Exit Interview to be launched in FY 2021.
	Dec 31, 2021		Schedule quarterly meetings with OHC to receive updates on the primary causes for employee departures, by data points such as race, disability, age etc., to seek ways for improving retention and organizational effectiveness.
	<u>Fiscal Year</u>	<u>Accomplishment</u>	
Accomplishments	2020	implemented by 2019, thus the tar modified from D Diversity Officer data collected do means to improve individuals with causes for emplo to seek ways for modified from Ja provided ODCR reviewed the exit the exit survey is (mandatory/volut leaving the agence by OHC, along w exit interview qu primary categorie	Target Date: The exit interview was not finalized nor OHC in FY 2019. The exit survey was launched on October 15, reget date to initiate a review of exit interview data has been ecember 1, 2018 to December 15, 2019. Although the Chief met with OHC and received the monthly exit survey data, the es not correspond to the data required in relation to identify e recruitment, hiring, inclusion, retention and advancement of disabilities. The target date for receiving updates on the primary yee departures, by data points such as race, disability, age etc., improving retention and organizational effectiveness has been nuary 13, 2019 to December 31, 2021. Accomplishments: OHC with monthly exit survey reports and data analysis. ODCR survey implemented by OHC in FY 2020 and determined that focused on identifying employees whom are retiring ntary and LEO/non-LEO) and the primary reason they are ey. Additionally, ODCR reviewed the monthly report provided with the resulting data. analysis of the monthly report and the estions, questions included in the exit survey identified, six (6) es; however, none of the categories gather information regarding or disability related reasons for leaving the agency.

### 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.

**Fors Mation MaRagenium (O&M)** contion (NRR) conservation distance with disabilities that are an distance of Additionally, the NRR manager participated in three recruiting events through AbilityJobFair, Career Expo for People with Disabilities, and Equal Opportunity Publications (EOP) for applicants with disabilities under the Schedule A and 30% or More Disabled Veteran hiring authorities. The NRR manager also participated in nineteen Recruit Military Job Fairs for 30% or More Disabled Veterans, as well as DHS is Hiring – Individuals with Disabilities webinar highlighting ICE positions and the ability for Schedule A and 30% or More Disabled Veterans to apply by submitting their resumes.

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 Additionally, the agency uses the Wounded Warrior and the Human Exploitation Rescue Operation (HERO) programs, which allow applicants to participate in an internship that may lead to a non-competitive appointment. The Schedule A and Veterans hiring authorities are covered under the annual mandatory training for all hiring managers/supervisors and HR Specialists. Information regarding the Workforce Recruitment Program (WRP) was also disseminated to managers and supervisors.

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 (OHC) 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 selectee 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. Additionally, the National Recruitment and Retention manager accepts resumes from Schedule A and 30% or More Disabled Veterans. The National Recruitment and Retention manager provides information regarding these individuals to hiring managers and provides the following information; their resume, the special authorities for which they qualify and, whether the individual meets the qualifications, to be non-competitively hired for the position.

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

The use of the Schedule A hiring authority is covered as part of the mandatory annual training for managers and supervisors. Additionally, it is covered in "ICE Disabilities 201", an online training course. ODCR partnered with the Office of Leadership and Career Development (OLCD), Instructional Management Unit to develop a new Reasonable Accommodations training as a prerequisite for managers and supervisors attending New Supervisors training at OLCD. Additionally, the new Reasonable Accommodation training will replace Disability 201 in PALMS as the new mandatory training for all managers and supervisors The Schedule A and veterans hiring authorities are covered under the annual mandatory training for all hiring managers/supervisors and HR Specialists. Information regarding the Workforce Recruitment Program (WRP) was also disseminated to managers and supervisors.

### 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 National Recruitment and Retention manager provided training on resume preparation in Baltimore, MD and Burlington, VT. ODCR and OHC meet quarterly to share resources, including the use of Field Special Emphasis Program Managers (F-SEPM) at recruitment events and the development of targeted recruitment plans for increasing the representation of PWD's and PWTD's. During FY 2021, the participation of OHC representatives and F-SEPMs at recruitment events has been limited due to the COVID-19 restrictions on community events. Additionally, ODCR developed a nation-wide list of Vocational Rehabilitation Offices, and American Job Centers in order to establish a platform for networking with agencies working with Persons with Disabilities.

### 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	Yes

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Additional analysis of the ICE Workforce Data indicates that Law Enforcement Officers (LEO) comprise 62% of the permanent workforce, and 38% of the permanent workforce held non-Law Enforcement positions (non-LEO) during FY 2020. During FY 2020, ICE had a total of 2093 new hires, of whom 37% are were hired into LEO positions, and 63% were hired into non-LEO positions. Analysis of Table B-1 indicates that the percentage of New Hires in the permanent workforce for PWD is 14.92%, which exceeds the benchmark. Thus, ICE does not have a trigger related to the percentage of PWD New Hires in the permanent workforce. ICE continues to demonstrate their ability to meet the PWTD goal as the Disability Team diligently engages with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. However, further analysis of Table B-1 indicates that the percentage of New Hires in the percentage of PWTD is 0.8% which falls below the benchmark. Thus, ICE continues to have a trigger related to the percentage of percentage of New Hires in the percentage of PWTD New Hires in

		Reportable	Disability	Targeted Disability		
New Hires	Total	Permanent Workforce	Temporary Workforce	Permanent Workforce	Temporary Workforce	
	(#)	(%)	(%)	(%)	(%)	
% of Total Applicants	0					
% of Qualified Applicants	0					
% of New Hires	781	9.60	0.00	0.51	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 U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Further analysis of the ICE Workforce Data indicates that Law Enforcement Officers (LEO) comprise 62% of the permanent workforce, and 38% of the permanent workforce held non-Law Enforcement positions (non-LEO) during FY 2020. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for General Inspection, Investigation, Enforcement and Compliance job series (1801) as mission critical positions are PWD (13.22) and PWTD (0.41%). The physical requirements of the General Inspection, Investigation, Enforcement and Compliance series (1801), are a potential barrier for PWD and PWTD applicants. Based on the information available on the MD-715 B6-1Per table, ICE does not have a trigger for New Hires

to General Inspection, Investigation, Enforcement and Compliance job series (1801) regarding PWD. However, based on the information available on the MD-715 B6-1Per table, ICE has a trigger for New Hires to General Inspection, Investigation, Enforcement and Compliance job series (1801) regarding PWTD. ICE conducted additional analysis regarding the General Inspection, Investigation, Enforcement and Compliance series and determined that all positions within series 1801 are not Law Enforcement positions. The non-Law Enforcement positions within the 1801 series, appears to provide a platform for the entrance of PWD and PWTD individuals into the 1801 series. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Criminal Investigator series (1811) as mission critical positions are PWD (4.60%) and PWTD (0%). The physical requirements of the Criminal Investigator series (1811), are a potential barrier for PWD and PWTD applicants. Based on the information available on the MD-715 B6-1Per (2) table, ICE has a trigger for New Hires to Criminal Investigator job series (1811) in regard to PWD and PWTD selections. ICE conducted additional analysis regarding the Criminal Investigator series and determined that all positions within series 1811 are not Law Enforcement positions. The non-Law Enforcement positions within the 1811 series, appears to provide a platform for the entrance of PWD and PWTD individuals into the 1811 series. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Attorney/General Attorney job series (0905) as mission critical positions are PWD (7.14%) and PWTD (1.19%). Based on the information available on the MD-715 B6-1Per (3) table, ICE has a trigger for New Hires to Attorney/General Attorney job series (0905) regarding PWD and PWTD selections. Although, ICE continues to have triggers related to PWD and PWTD selections for the Attorney/General Attorney job series (0905), ICE made tremendous strides toward meeting these benchmarks in FY 2020. During FY 2020 ICE experienced a 1.37% increase in the representation of PWD, as well as a 1.19% increase in the representation of PWTD in the Attorney/General Attorney job series (0905). The increase noted in PWD and PWTD representation in the 0905 job series is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. In comparison to the benchmarks, the percentage of New Hires (external selections) among the qualified external applicants for Intelligence Research Specialists job series (0132) as mission critical positions are PWD (15.15%) and PWTD (0.76%). Based on the information available on the MD-715 B6-1Per (4) table, ICE no longer has a trigger for New Hires to Intelligence Research Specialists job series (0132) regarding PWD. During FY 2020 ICE experienced a 5.63% increase in the representation of PWD, in the Intelligence Research Specialists job series (0132). Based on the information available on the MD-715 B6-1Per (4) table, ICE continues to have a trigger for New Hires in the Intelligence Research Specialists job series (0132) regarding PWTD selections. Analysis of the available ICE Workforce Data demonstrates that during FY 2020, ICE had a total of 2,094 new hires, of which 1247 or 60% were hired into Mission Critical Positions. Further analysis indicates that of the breakdown of PWD and PWTD new hires to Mission Critical Positions is as follows: General Inspection, Investigation, Enforcement and Compliance Series 1801 – of the 490 new hires, 15 or 3.1% are PWDs and 2 or 4% are PWTDs. Furthermore, of the 15 PWDs, 11 were hired into LEO positions. Criminal Investigator Series 1811 – of the 370 new hires, 8 or 2.2% are PWDs. Furthermore, of the 8 PWDs, 7 were hired into LEO positions. Attorney/General Attorney Series 0905 – of the 238 new hires, 11 or 4.6% are PWDs and 4 or 1.7% are PWTDs. Intelligence Research Specialists 0132 – of the 149 new hires, 8 or 5.4% are PWDs and 2 or 1.3% are PWTDs.

New Hires to	New Hires to		Disability	Targetable Disability			
Mission-Critical Occupations	Total	Qualified Applicants	New Hires	Qualified Applicants	New Hires		
	(#)	(%)	(%)	(%)	(%)		
Numerical Goal		12	12% 2%		12% 2%		6
0132INTELLIGENC OFFICER	0	0.00	0.00	0.00	0.00		
0905GENERAL ATTORNEY	0	0.00	0.00	0.00	0.00		
1801IMMIGRATION ENFORCEMENT AGENT	0	0.00	0.00	0.00	0.00		
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.

Answer Yes

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Further analysis of the ICE Workforce Data indicates that Law Enforcement Officers (LEO) comprise 62% of the permanent workforce, and 38% of the permanent workforce held non-Law Enforcement positions (non-LEO) during FY 2020. Analysis of Table B 6-1Per indicates that a trigger exists regarding Qualified Internal Applicants for General Inspection, Investigation, Enforcement and Compliance job series (1801) among PWD and PWTD. Analysis of Table B 6-1Per (2) indicates that a trigger exists regarding Qualified Internal Applicants for Attorney/General Attorney series 0905 among PWD and PWTD. Analysis of Table B 6-1Per (4) indicates that a trigger exists regarding Qualified Internal Applicants for Stormy/General Attorney series 0905 among PWD and PWTD. Analysis of Table B 6-1Per (4) indicates that a trigger exists regarding Qualified Internal Applicants for Stormy/General Attorney for Intelligence Research Specialist job series 0132 among PWD and PWTD.

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 U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Analysis of the available ICE Workforce Data demonstrates that, during FY 2020, ICE had a total of 3,608 promotions within the workforce. Analysis of the MD-715 Tables provides the following information: According to Table B 6-1Per, that 21.91% of the internal selections for promotion involving the General Inspection, Investigation, Enforcement and Compliance job series (1801) are PWDs. ICE continues to demonstrate their ability to meet the PWTD goal as the Disability Team diligently engages with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. Additionally, ICE noted that 1.89% of the internal selections for promotion involving the General Inspection, Investigation, Enforcement, and Compliance job series (1801) are PWTDs. During FY 2020 ICE noted a 0.23% increase in the internal selections for promotion involving the General Inspection, Investigation, Enforcement, and Compliance job series (1801) for PWTDs. The increase noted in PWTD representation in the in the internal selections for promotion involving the General Inspection, Investigation, Enforcement, and Compliance job series (1801) is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. According to Table B6-1Per (2) that 5.39% of internal selections for promotion involving the Criminal Investigator series (1811) are PWDs. Additionally, ICE noted that 0.15% of the internal selections for promotion involving the Criminal Investigator series (1811) are PWTDs. According to Table B 6-1Per (3) that 5.61% of internal selections for promotion involving the Attorney/General Attorney series (0905) are PWDs. During FY 2020 ICE noted a 1.26% increase in the internal selections for promotion involving the Attorney/General Attorney series (0905) for PWDs. The increase noted in PWD representation in the in the internal selections for promotion involving the Attorney/General Attorney series (0905) is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. Additionally, ICE noted that 0.47% of the internal selections for promotion involving the Attorney/General Attorney series (0905) are PWTDs. During FY 2020 ICE noted a 0.47% increase in the internal selections for promotion involving the Attorney/ General Attorney series for PWTDs. The increase noted in PWD representation in the in the internal selections for promotion involving the Attorney/General Attorney series (0905) is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. According to Table B 6-1 Per (4) that 22.75% of internal selections for promotion involving the Intelligence Research Specialist job series (0132) are PWDs. Additionally, ICE noted that 0.60% of internal selections for promotion involving the Intelligence Research Specialist job series (0132) are PWTDs. The available USA Staffing Applicant Flow Data provides information regarding Internal Competitive promotions for Mission Critical Occupations across all grades, once the closed and all certificates for the vacancy have been audited.

# 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 2020, ODCR's Disability Team provided customized training for Managers and Supervisors with the goal of increasing their knowledge of Reasonable Accommodations. The customized trainings focused on the Decision-makers role and responsibilities, supervisors/managers roles/responsibilities as well as those of the employee and ODCR. ODCR's goal for providing this training is to equip Managers and Supervisor's with the tools and resources available for conducting the interactive process, coordinating with the reasonable accommodation coordinator and effectively processing Reasonable Accommodation requests within the timeframes set forth in the ICE RA Procedures. The Disability team has noted a dramatic increase in participation in the interactive process of Decision-makers, managers and supervisors in offices where the training has been conducted. Additionally, the Disability Team noted a dramatic increase in timely responses from managers and supervisors when providing needed information or documentation, as well as in finalizing and issuing the RA Decision to the requestor. In FY 2020, the Disability Program Manager (DPM) continued to work with the ICE Office of Leadership and Career Development (OLCD) to ensure data will be collected regarding PWD and PWTD participation, and that all notifications/announcements contain information for requesting a reasonable accommodation. In FY 2019 the data provided was limited to one Mentoring program and eight Career Development programs. For FY 2020 ODCR received information from OLCD regarding seven mentoring programs, one Coaching program, and eight career development programs. Additionally, the DPM worked with the following Directorates and DHS entities to gather data regarding FY 2020 Career Development Opportunities: • Director of the DHS Intelligence Training Academy; • Homeland Security Investigations (HSI) – Office of Intelligence; • Office of the Chief Information Officer (OCIO) - Employee Development and Management Liaison; and • Homeland Security Investigations (HSI) - Cyber Crimes Center. Additionally, the DPM initiated contact with the Wounded Warrior Internship POC to ensure data will be collected and provided to ODCR regarding PWD and PWTD participation for FY 2021.

### **B. CAREER DEVELOPMENT OPPORTUNITES**

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 OLCD consists of the Leadership Development Center and the Training and Performance Support Division. OLCD provides training for the ICE workforce that 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. Courses available via the LDC provides opportunities for employees to increase knowledge, skills and abilities leading to opportunities for career advancement. The Office of the Chief Information Officer (OCIO) Employee Development and Management Liaison coordinates the provision of career development training for employees throughout their division to enhance current skills, and build new skills, which may enhance opportunities for career advancement. The Department of Homeland Security - Intelligence Training Academy coordinates the provision of career development training for employees throughout HSI to enhance current skills, and build new skills, which may enhance opportunities for career advancement. The Department of Homeland Security - Intelligence Training Academy coordinates the provision of career development training for employees throughout the HSI Office of Intelligence to enhance current skills, and build new skills, which may enhance opportunities for career advancement.

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

Correct Development	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Training Programs	305	285	7.9	8.4	1.6	1.8
Internship Programs	107	14		21.4		14.3

Comos Development	Total Participants		PWD		PWTD	
Career Development Opportunities	Applicants (#)	Selectees (#)	Applicants (%)	Selectees (%)	Applicants (%)	Selectees (%)
Other Career Development Programs	2732	2732	7	7	2	2
Coaching Programs	240	240	6.30	6.30	1.30	1.30
Mentoring Programs	562	562	6.2	6.2	1.4	1.4
Fellowship Programs						
Detail 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	Yes
b. Selections (PWD)	Answer	Yes

Available Career Development Data breaks down as follows: Total Applicants 3,946, of whom 7.1% are PWD. Total Participants 3,834 of whom 7.3% are PWD. Further analysis indicates that a total of 989 LEO's applied for Career Development opportunites, of which 3% are PWD. Additionally, of the 972 LEO's whom participated in Career Development programs 3% are PWD. Based on the available data, ICE has a trigger regarding PWD participation within the Career Development programs.

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

Available Career Development Data breaks down as follows: Total Applicants 3,946, of whom 2% are PWTD. Total Participants 3,834 of whom 2% are PWTD. Further analysis indicates that a total of 989 LEO's applied for Career Development opportunites, of whom 0.1% are PWTD. Additionally, of the 972 LEO's whom participated in Career Development programs 0.1% are PWTD. Based on the data available, ICE met the benchmark and does not have a trigger related to PWTD participation within the Career Development programs.

### 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

Analysis of the MD-718 B-9 table identified triggers involving the percentage of PWD and PWTD who received Time Off Awards hours, as follows: PWD whom received a Time Off Award of 11-20 hours. PWTD whom received a Time Off Award of 21-30 hours. PWTD whom received a Time Off Award of 21-30 hours. Analysis of the MD-718 B-9 table identified triggers involving the percentage of PWD and PWTD who received Cash Awards, as follows: PWD whom received a Cash Award \$1,000-\$1,999 PWTD whom received a Cash Award \$2,000-\$2,999 PWTD whom received a Cash Award \$3,000-

\$3,999 PWTD whom received a Cash Award \$3,000-\$3,999 PWD whom received a Cash Award \$4,000-\$4,999 PWTD whom received a Cash Award \$4,000-\$4,999 PWD whom received a Cash Award \$5,000-\$5,999 PWTD whom receive

Time-Off Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Time-Off Awards 1 - 10 hours: Awards Given	1469	19.45	4.81	34.72	18.09
Time-Off Awards 1 - 10 Hours: Total Hours	12032	156.94	39.87	277.78	146.19
Time-Off Awards 1 - 10 Hours: Average Hours	8.19	0.31	0.05	3.70	0.00
Time-Off Awards 11 - 20 hours: Awards Given	15225	60.20	76.56	46.30	61.43
Time-Off Awards 11 - 20 Hours: Total Hours	222745	902.16	1116.33	728.70	917.59
Time-Off Awards 11 - 20 Hours: Average Hours	14.63	0.57	0.08	7.29	-0.03
Time-Off Awards 21 - 30 hours: Awards Given	2688	9.04	13.72	9.72	8.98
Time-Off Awards 21 - 30 Hours: Total Hours	64940	216.53	331.63	233.33	215.04
Time-Off Awards 21 - 30 Hours: Average Hours	24.16	0.91	0.14	11.11	0.00
Time-Off Awards 31 - 40 hours: Awards Given	706	3.63	3.33	3.70	3.63
Time-Off Awards 31 - 40 Hours: Total Hours	24732	131.52	115.82	140.74	130.70
Time-Off Awards 31 - 40 Hours: Average Hours	35.03	1.37	0.20	17.59	-0.07
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	6604	41.43	30.33	43.06	41.29
Cash Awards: \$501 - \$999: Total Amount	5114562	31401.29	23629.31	31851.85	31361.19
Cash Awards: \$501 - \$999: Average Amount	774.46	28.68	4.46	342.49	0.75
Cash Awards: \$1000 - \$1999: Awards Given	13800	55.62	69.18	49.54	56.16
Cash Awards: \$1000 - \$1999: Total Amount	20074653.3	77665.39	101140.03	70730.56	78282.58
Cash Awards: \$1000 - \$1999: Average Amount	1454.69	52.83	8.37	661.03	-1.30
Cash Awards: \$2000 - \$2999: Awards Given	2759	8.63	14.25	8.33	8.65
Cash Awards: \$2000 - \$2999: Total Amount	6733655	20360.95	34919.70	20393.52	20358.06
Cash Awards: \$2000 - \$2999: Average Amount	2440.61	89.30	14.02	1132.97	-3.58

Cash Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Cash Awards: \$3000 - \$3999: Awards Given	1483	4.92	7.65	5.56	4.86
Cash Awards: \$3000 - \$3999: Total Amount	5250835	16841.70	27181.29	19232.41	16628.92
Cash Awards: \$3000 - \$3999: Average Amount	3540.68	129.55	20.35	1602.70	-1.56
Cash Awards: \$4000 - \$4999: Awards Given	132	0.61	0.65	0.00	0.66
Cash Awards: \$4000 - \$4999: Total Amount	574055	2684.11	2827.24	0.00	2922.99
Cash Awards: \$4000 - \$4999: Average Amount	4348.9	167.76	24.80	0.00	182.69
Cash Awards: \$5000 or more: Awards Given	19	0.00	0.10	0.00	0.00
Cash Awards: \$5000 or more: Total Amount	99825	0.00	542.85	0.00	0.00
Cash Awards: \$5000 or more: Average Amount	5253.95	0.00	30.16	0.00	0.00

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.

Answer

Answer

Yes

Yes

a. Pay Increases (PWD)

b. Pay Increases (PWTD)

Analysis of Table B-9 indicates that ICE has a trigger regarding Quality Step Increases for PWD and PWTDs. Additional analysis of ICE WFD indicates that no ICE employees received a quality step increase during FY 2020.

Other Awards	Total (#)	Reportable Disability %	Without Reportable Disability %	Targeted Disability %	Without Targeted Disability %
Total Performance Based Pay Increases Awarded	72	0.23	0.37	0.00	0.25

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

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

The MD-715 B Tables do not contain information regarding the following awards: • Individual Special Act or Service cash award; and • Joint Financial Management Improvement Award. Analysis of the ICE Workforce Data indicates that in FY 2020, 19 individuals received an Individual Special Act or Service award, and 11 employees received a Joint Financial Management Improvement Award. Additional analysis indicates that 0% of the individuals receiving Special Act or Service cash awards are PWD or PWTD, thus ICE has a trigger related to PWD and PWTD for this award category. Furthermore, analysis regarding the Joint Financial Management Improvement Award indicates that 8% of the individuals receiving this award are PWD, and 0% are PWTD. Thus ICE has a trigger related to this award for PWD and PWTD. Individual Special Act or Service cash award \$0-\$999 was received by 1 individual. Individual Special Act or Service cash award \$1,000-\$1,999 was received by 7 individuals. Individual Special Act or Service cash award \$2,000-\$2,999 was received by 1 individual. Individual Special Act or Service cash award \$3,000-\$3,999 was received by 1 individual. Individual Special Act or Service cash award \$3,000-\$3,999 was received by 1 individual. Individual Special Act or Service cash award \$4,000-\$4,999 was received by 2 individuals. Individual Special Act or Service cash award \$5,000-\$5,999 was received by 5 individuals. Individual Special Act or Service cash award \$6,000-\$6,999 was received by 1 individual. Individual Special Act or Service cash award \$8,000-\$8,999 was received by 1 individual. Joint Financial Management Improvement Award 8 hours was received by 7 employees. Joint Financial Management Improvement Award 24 hours was received by 4 employees.

### **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

Analysis of Table B 7-1 indicates that ICE has triggers among SES, GS-15, GS-14, and GS-13 grades for PWD. Additional analysis was conducted using USA Staffing Applicant Flow Data. However, ICE is unable to identify the percentage of qualified internal PWTD applicants whom have been promoted to SES, GS-15, GS-14, or GS-13 positions, because the available data is only contains positions for which announcement is closed and all certificates for a vacancy have been audited.

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.

d: BEB		
i. Qualified Internal Applicants (PWTD)	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

a SES

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

Analysis of Table B 7-1 demonstrates that ICE has triggers among SES, GS-15, GS-14, and GS-13 grades for PWTD. Additional analysis was conducted using USA Staffing Applicant Flow Data. However, ICE is unable to identify the percentage of qualified internal PWTD applicants whom have been promoted to SES, GS-15, GS-14, or GS-13 positions, because the available data is only contains positions for which announcement is closed and all certificates for a vacancy have been audited.

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 U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. However, upon conducting further analysis of the ICE Workforce Data Law Enforcement Officers (LEO) comprise 62% of the permanent workforce, and 38% of the permanent workforce were non-Law Enforcement positions (non-LEO) during FY 2020. Further analysis of the available ICE workforce data indicates that 37% of new hires were LEO, and 63% of new hires were non-LEOs. FY 2020 new hires in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – Analysis of the available workforce data indicates there were 5 new hires to SES positions, of whom 0.0% were LEO, and 100% were non-LEO. GS-15 – Analysis of the available workforce data indicates there were 29 new hires to GS-15 positions, of whom 7% were LEO, and 93% were non-LEO. GS-14 – Analysis of the available workforce data indicates there were 201 new hires to GS-14 positions, of whom 5% were LEO, and 94% were non-LEO. GS-13 – Analysis of the available workforce data indicates there were 255 new hires to GS-13 positions, of whom 4.3% were LEO, and 95.7% were non-LEO. Analysis of Table B 7-1 indicates that ICE no longer has a trigger in regard to New Hires to GS-13 positions for PWD. The resolution of this trigger is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. Analysis of Table B 7-1 identified triggers regarding New Hires among GS-14, and GS-15 grades for PWD. ICE was unable to confirm if a trigger exists for PWD new hires to SES, as Table B 7-1 does not contain information regarding new hires for SES. It is also important to note that 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 LEOs among selectees for promotion.

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	Yes

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. However, upon conducting further analysis of the ICE Workforce Data Law Enforcement Officers (LEO) comprise 62% of the permanent workforce, and 38% of the permanent workforce were non-Law Enforcement positions (non-LEO) during FY 2020. Further analysis of the available ICE workforce data indicates that 37% of new hires were LEO, and 63% of new hires were non-LEOs. FY 2020 new hires in relation to SES, GS-15, GS-14, or GS-13 positions are noted as follows: SES – Analysis of the available workforce data indicates there were 5 new hires to SES positions, of whom 0.0% were LEO, and 100% were non-LEO, GS-15 – Analysis of the available workforce data indicates there were 29 new hires to GS-15 positions, of whom 7% were LEO, and 93% were non-LEO. GS-14 – Analysis of the available workforce data indicates there were 201 new hires to GS-14 positions, of whom 5% were LEO, and 94% were non-LEO. GS-13 – Analysis of the available workforce data indicates there were 255 new hires to GS-13 positions, of whom 4.3% were LEO, and 95.7% were non-LEO. Analysis of Table B 7-1 identified triggers regarding New Hires among GS-15, GS-14, and GS-13 grades for PWTD. It is also important to note that 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.

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

Analysis of Table B 7-1 identified triggers regarding Qualified Internal Applicants among Executives, Managers, and Supervisors whom are PWDs. Additional analysis of the available USA Staffing data, however, information is not available regarding Qualified Internal Applicants among Executives, Managers, and Supervisors.

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)		Yes
ii. Internal Selections (PWTD)	Answer	Yes

Analysis of Table B 7-1 identified triggers regarding Qualified Internal Applicants among Executives, Managers, and Supervisors whom are PWTDs. Additional analysis of the available USA Staffing data, however, information is not available regarding Qualified Internal Applicants among Executives, Managers, and Supervisors.

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	No

Analysis of the available ICE Workforce Data demonstrates that there were a total number of 2093 New Hires during FY 2020, of whom 2.6% are classified as supervisors. The breakdown of those classified as supervisors is as follows: GS-13 7 individuals GS-14 21 individuals GS-15 21 individuals SES 5 individuals Analysis of Table B 8-1, indicates ICE continues to have a trigger in regard to New Hires among Executives, Further analysis of Table B 8-1 indicates that ICE no longer has a trigger in regard to Managers and Supervisors for PWD. The resolution of these triggers is a direct result of the Disability Team engaging with hiring managers to encourage the use of Special Hiring Authorities, conducting a resurvey of the ICE Workforce, and provision of Reasonable Accommodation training across the entity. Additional analysis was conducted utilizing the Applicant Flow Data is provided by USA Staffing. However, the available data does not contain information regarding New Hires for Executives, Managers, and Supervisors.

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

Analysis of the available ICE Workforce Data demonstrates that there were a total number of 2093 New Hires during FY 2020, of whom 2.6% are classified as supervisors. The breakdown of those classified as supervisors is as follows: GS-13 7 individuals GS-14 21 individuals GS-15 21 individuals SES 5 individuals Analysis of Table B 8-1 identified triggers regarding New Hires among Executives, Managers and Supervisors for PWTD. Additional analysis was conducted utilizing the Applicant Flow Data is provided by USA Staffing. However, the available data does not contain information regarding New Hires for Executives, Managers, and Supervisors.

### 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, who were eligible for conversion to competitive service in FY 2020 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 2 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	Yes
b.Involuntary Separations (PWD)	Answer	Yes

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Analysis, of the available Workforce Data indicates ICE had total of 1,361 separations, of which 1242 were voluntary separations, and 119 were involuntary separations during FY 2020. The employees whom voluntarily separated from the agency were comprised of 551 Law Enforcement Officers (LEO), and 553 were non-Law Enforcement Officers (non-LEO). The employees whom involuntarily separated from the agency were comprised of 70 LEO, and 49 non-LEOs. Additonal anlaysis indicates that 110 PWD voluntarily separated, 4 PWD involuntarily separated from the agency. Using the inclusion rate as the benchmark indicates that ICE has a trigger among PWD whom voluntary or involuntary separated from the agency during FY 2020.

Seperations	Total #	Reportable Disabilities %	Without Reportable Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	74	0.56	0.32
Permanent Workforce: Resignation	125	1.02	0.54
Permanent Workforce: Retirement	599	3.58	2.77
Permanent Workforce: Other Separations	358	2.79	1.56
Permanent Workforce: Total Separations	1156	7.94	5.20

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

The U.S. Immigration and Customs Enforcement (ICE) workforce consisted of 20,845 employees. Analysis, of the available Workforce Data indicates ICE had total of 1,361 separations, of which 1242 were voluntary separations, and 119 were involuntary separations during FY 2020. The employees whom voluntarily separated from the agency were comprised of 551 Law Enforcement Officers (LEO), and 553 were non-Law Enforcement Officers (non-LEO). The employees whom involuntarily separated from the agency were comprised of 70 LEO, and 49 were non-LEOs. Additonal analysis indicates that 21 PWTD voluntarily separated and 3 PWTD involuntarily separated from the agency. Using the inclusion rate as the benchmark indicates that ICE has a trigger among PWTD whom voluntary or involuntary separated from the agency during FY 2020.

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Reduction in Force	0	0.00	0.00
Permanent Workforce: Removal	74	0.92	0.35
Permanent Workforce: Resignation	125	0.92	0.60

Seperations	Total #	Targeted Disabilities %	Without Targeted Disabilities %
Permanent Workforce: Retirement	599	5.96	2.84
Permanent Workforce: Other Separations	358	3.67	1.70
Permanent Workforce: Total Separations	1156	11.47	5.48

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.

The Office of Human Capital initiated the ICE exit survey in FY 2020. An analysis of the available exit interview data was conducted along with a review of the exit interview questions. The Exit Survey is streamlined to specifically identify if an employee is retiring (mandatory/voluntary and LEO/non-LEO) and what is the primary reason an employee leaves ICE. There are six (6) primary categories: Job Characteristics, Work Environment, Career Development, Work-Life Balance, Retirement and Other factors such as compensation or returning to school. No data is gathered via the exit survey that indicates if the individual is a PWD or PWTD

### **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 conducted Architectural Barrier Assessments of six ICE offices in Washington, DC during FY 2019. ODCR staffinitiated contact with supervisors in various locations throughout ICE to address identified Architectural Barriers during FY 2020. Additionally, ODCR staff has established a nationwide plan for rolling out the Architectural Barriers Assessment program. However, a shift in focus for the Architectural Barriers assessment program was initiated due to COVID-19 and the inability to conduct in-person assessments, or to complete tasks for resolving identified issues. During FY 2020 the Disability Program Manager and the Acting Deputy Diversity Officer met with the Facilities Management team and were provided a wealth of information regarding ICE facilities nationwide. The Facilities Management Team provided ODCR with a list of all ICE facilities nationwide and their status (i.e. rental property, ICE owned, GSA owned, office or detention center). The information received is the basis for establishing an Architectural Barriers Assessment tracking system. F-SEPM's training is currently under revision to incorporate information related to COVID-19 and its impact on conducting Architectural Barrier Assessments. Post Covid-19 the Disability program will partner with the F-SEPM's Architectural Barrier Assessments of ICE facilities, during which they will complete a checklist and return a written report to the Disability Program Manager. We will implement development of plans and strategies to address the identified Architectural Barriers in FY 2021.

### 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 2020 was 38 days. In comparison with the average processing time in FY 2019, the RA team reduced the average processing days in FY 2020 by 28.95 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 2020, the reasonable accommodation tracking system was updated to include tracking reassignment searches, requests for reconsideration, and to facilitate the identification of barriers within the processing of requests. The Disability Team along with the Chief Diversity Officer and the Acting Deputy Chief Diversity Officer participated in process mapping which led to additionally streamlined RA processes and updated RA Standard Operating Procedures. Standardized emails were further revised to aid reasonable accommodation coordinators when requesting needed information from employees and decision-makers. The Disability Team initiated the use of a "intake packet" for employee's and supervisors. The initiation of the "intake packet" has led to improved participation in the process from supervisors, and quicker response times from supervisors/employees whom need to provide additional information to the Reasonable Accommodation Coordinator. The initiation of the "intake packet" has had a significant impact in the reduction in case processing days for each request. In FY 2020, a contract was established that provides services for Deaf/HOH/Visually Impaired. The initiation of the new contract has significantly streamlined the process for Reasonable Accommodation Coordinators was established that allows ICE to provide PAS services in specific locations pending award of the ICE PAS BPA. Additionally, in FY 2020 an Inter-Agency Agreement (IAA) was initiated related to Ergonomic Assessments. Previously, ergonomic assessments were facilitated via the ICE Safety Office. The establishment of the IAA allows ODCR to work directly with the vendor to obtain the needed assessments, eliminating the "middle man" in the process, and lessening the wait time for employees to receive the requested services.

## 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.

During FY 2020, the PAS procedures and templates were cleared through ODCR internal clearance and were submitted to EEOC for review on March 3, 2020. The PAS procedures were posted to the required websites on June 12, 2020. The procurement packet for a standalone ICE contract was completed and awarded in September 2020. Additionally, a procurement packet was completed and submitted to establish an ICE BPA for PAS services. Training was provided for ERO and OPLA at one ICE location in FY 2020 and will be rolled out across ICE in FY 2021.

### 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

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.

The finding was a default judgment for failure to timely investigate the complaint. The corrective action included: \$95,000 in compensatory damages; \$15,091 in attorney fees and costs paid to Complainant; 8 hours of training for EEO office staff regarding complaint processing and timetables/deadlines; and a Notice to Employees posted 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?

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.

### 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

Answer No

Source of the	Trigger:	Workforce D	ata (if so identify	v the table)			
Specific Work Table:			ata Table - B1	,			
STATEMEN CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	The lower that	an expected repr	esentation of P	WD and PW	TD who received other types of awards.	
Provide a brief describing the issue.							
How was the c recognized as a barrier?							
STATEMEN	-	Barrier Group					
BARRIER G	ROUPS:	People with I	Disabilities				
		-	Targeted Disabi	lities			
Barrier Analy Completed?:	sis Process	Y					
Barrier(s) Ide	ntified?:	N					
STATEMEN		Barri	ier Name	D	escription of	Policy, Procedure, or Practice	
IDENTIFIED	BARRIER:	Unidentified		To date no ba	arrier has bee	en identified.	
Provide a succ of the agency procedure or practice that determined to of the undesired cond	policy, t has been be the barrier						
	1		Objective(s)	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/21/2021	Yes			Identify and resolve potential barriers regarding PWI and PWTD in regard to receiving other types of awards.		
			Respo	onsible Officia	l(s)		
	Title			Name		Standards Address The Plan?	
(A) Chief, Div Division, ODO	versity Manager CR	nent	Rita Bhanot			Yes	
Deputy Assistant Director, ODCR		DCR	Robin Kilgore			Yes	
(A) Deputy Cl Division, ODC	nief, Diversity I CR	Management	Carolyn L. Leary			Yes	
Assistant Dire	ctor, ODCR		Scott Lanum			Yes	
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes	

Planned Activities Toward Completion of Objective							
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date			
09/30/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No					
06/30/2021	Conduct a focus group with supervisors.	No					
03/30/2021	Conduct additional analysis to identify any potential barriers.	No					
12/31/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No					
08/30/2021	Conduct a focus group with employees. No						
	Report of Accomplishme	ents					
Fiscal Year	ear Accomplishment						

Source of the	Trigger:	Workforce Da	ata (if so identify	v the table)		
Specific Work Table:		Workforce Da		, , ,		
STATEMENT CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A		ber of selections he goal of 2%.	of PWTD reg	arding new h	ires in the permanent workforce as
Provide a brief describing the issue.						
How was the c recognized as a barrier?						
STATEMEN		Barrier Grou	p			
BARRIER GI	ROUPS:	People with '	Targeted Disabi	lities		
Barrier Analy Completed?:	sis Process	Y				
Barrier(s) Ide	ntified?:	Y				
STATEMENT		Barri	rier Name Description of			Policy, Procedure, or Practice
<b>IDENTIFIED</b> Provide a succ. of the agency p procedure	inct statement policy,	Law Enforcement Barrier		maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding Law Enforcement positions, and non- Law Enforcement positions.		
or practice that determined to		Architectural Barriers		Architectural Barriers have been identified at ICE facilities in Washington, DC.		
of the undesired cond		Physical Barrier		Physical requirement barriers have been identified regarding Law Enforcement positions.		
			Objective(s) a	and Dates for	EEO Plan	
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description
10/01/2019	12/31/2021	No			To increase the number of PWTD selections (new hires) in the permanent workforce	
			Respo	nsible Officia	l(s)	
	Title			Name		Standards Address The Plan?
Deputy Assista	ant Director, O		Robin Kilgore			Yes
	(A) Chief, Diversity Management Division, ODCR		Rita Bhanot			Yes
	gram Manager,		Lynn Dickson			Yes
Assistant Dire	ctor, ODCR		Scott Lanum			Yes
(A) Deputy Ch Division, ODC	nief, Diversity M CR	Management	Carolyn L. Lear	у		Yes

Target Date	Planned Activities Toward Completio Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date			
09/30/2020	Conduct additional analysis to identify additional barriers.	No		09/30/2020			
11/30/2020	Draft a plan of action to resolve barriers identified via barrier analysis.						
03/30/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No					
09/30/2020	ODCR and OHC will share resources, including the utilization of F-SEPM at recruitment events.	No	09/30/2021				
01/31/2021	ODCR and OHC 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.	No					
03/30/2021	Develop a state by state list of law schools and their disability program point of contact.	No					
06/30/2021	Draft an outreach plan in partnership with OHC to target these institutions.	No					
09/30/2021	Develop marketing materials to be provided to the Disability Program Point of Contact at these institutions.	No					
	Report of Accomplishmen	nts					
Fiscal Year	Accomplish	nment					
2020	1. Please explain the factor(s) that prevented the agency fro The ongoing COVID-19 restrictions has impacted the agence this time ICE employees are teleworking to the maximum e pandemic related restrictions, and restrictions in place unde COVID-19 restrictions ODCR and OHC were limited in the thus the completion date for this activity has been modified completion date for ODCR and OHC participation in recrui been modified to September 30, 2021.	cy's ability to tim extent possible ba r the ICE Recons eir ability to utiliz to September 30 timent events at C	nely complete vari sed on their locati stitution Plan. Due ze F-SEPM's at re , 2021. Additiona Gallaudet Universi	ous activities. A on, local to the ongoing ccruitment events lly, the ty and NTID ha			
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control mealtimes, and necessity to maintain a current driver's license, for both LEO and non-LEO positions.						
2019	ODCR conducted seven (7) Architectural Barrier Assessme	ents of ICE facilit	ies in Washingtor	ı, DC.			
2020	Additional, barrier analysis was conducted identifying multiple positions throughout ICE with potential barriers for PWD and PWTD employees in both LEO and non-LEO positions.						
2020	2. For the planned activities that were completed, please development of the barrier(s). ODCR conducted a review of 191 position descriptions to i positions. Potential barriers related to the requirement to ob physical activity, vision/hearing requirements and dexterity impacting separation for PWD and PWTD employees.	dentify potential tain and maintair	barriers for LEO and driver's license	and non-LEO e, strenuous			

Source of the	Trigger:	Workforce Data (if so identify the table)					
Specific Work Table:	force Data	Workforce Da	Data Table - B1				
CONDITION THAT WASInspection, Investigation, Enforcement and Specialist job series (0132) as compared to and PWTD regarding new hires for Mission and Attorney/General Attorney (0905), and				orcement and compared to t es for Mission	Compliance j he goal of 29 Critical Posi	tion; Criminal Investigator series (1811)	
Provide a brief narrative describing the condition at issue.							
How was the c recognized as a barrier?							
STATEMEN		Barrier Grou	p				
BARRIER GI	ROUPS:	People with I	Disabilities				
		People with	Targeted Disabil	lities			
Barrier Analy Completed?:	sis Process	Y					
Barrier(s) Ide	ntified?:	Y					
STATEMENT		Barrier Name		Description of Policy, Procedure, or Practice			
<b>IDENTIFIED</b>		Architectural			Architectural Barriers have been identified at ICE facilities in Washington, DC.		
Provide a succi of the agency procedure		Physical Barrier		Physical requirement barriers have been identified regarding Law Enforcement positions.			
or practice that determined to b of the undesired cond	be the barrier	Law Enforce	ment Barrier	maintaining a	a valid driver vehicle durin	ied related to the obtaining and 's licenses and ability to drive a g duty hours regarding Law Enforcement, nt positions.	
			<b>Objective</b> (s) a	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/31/2021	Yes				the number of PWD and PWTD selections for Mission Critical Positions.	
			Respo	nsible Officia	l(s)		
	Title			Name		Standards Address The Plan?	
Deputy Assist	ant Director, O	DCR	Robin Kilgore			Yes	
(A) Chief, Diversity Management Division, ODCR		nent	Rita Bhanot			Yes	
Disability Prog	gram Manager,	ODCR	Lynn Dickson			Yes	
Assistant Dire	ctor, ODCR		Scott Lanum			Yes	
(A) Deputy Ch Division, ODC	nief, Diversity M CR	Management	Carolyn L. Leary			Yes	

	Planned Activities Toward Completic					
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date		
09/30/2019	Conduct additional analysis to identify any potential barriers regarding Attorney/General Attorney (0905).	No	12/31/2019	12/31/2019		
09/30/2020	Draft a plan of action to resolve barriers identified via barrier analysis.	No		09/30/2020		
08/30/2020	Conduct additional analysis to identify any potential barriers regarding Criminal Investigator Series 1811, and Intelligence Research Specialist Series 0132.	No		08/30/2020		
11/30/2020	Implement plans of action to resolve barriers identified via barrier analysis.	No				
09/30/2020	ODCR and the Office of Human Capital will share resources, including the utilization of F-SEPM at recruitment events.	No	09/30/2021			
01/31/2020	ODCR and OHC 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.	No	09/30/2021			
03/30/2021	Develop a state by state list of Law Schools and their Disability Program Point of Contact.	No				
06/30/2021	Draft an outreach plan in partner with OHC to target these institutions.	No				
09/30/2021	Develop marketing materials to be provided to the Disability Program Point of Contact at these institutions.	No				
	Report of Accomplishme	nts				
Fiscal Year	Accomplish	nment				
2020	Additional, barrier analysis was conducted regarding the 01 throughout ICE with potential barriers for PWD and PWTE					
2020	1. Please explain the factor(s) that prevented the agency fro The ongoing COVID-19 restrictions has impacted the agen with Gallaudet University or NTID due to local pandemic r the ICE Reconstitution Plan. The completion date for ODC Gallaudet University and NTID has been modified to Septe	cy's ability to par related restrictions R and OHC partic	ticipate in recruitr	nent activities in place under		
2020	<ul> <li>3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.</li> <li>Barrier analysis continued throughout FY 2020, however, due to the contractors limited availability ODCR was unable to complete the review of position descriptions and move forward with a review of pertinent policies.</li> </ul>					
2019	The number of PWD and PWTD new hires for the General Inspection, Investigation, Enforcement and Compliance job series (1801) increased in FY 2019, resulting in the resolution of the triggers identified in FY 2018.					
2019	Additionally, the number of PWD and PWTD new hires for increased in FY 2019, resulting in the resolution of the trigg			es (1811)		
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control mealtimes, and necessity to maintain a current driver's license, for both LEO and non-LEO positions.					
2020	A plan of action to address the identified barriers was drafted	ed.				

Report of Accomplishments						
Fiscal Year	Accomplishment					
2012	<ul> <li>2. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).</li> <li>ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.</li> </ul>					

Source of the	Triggory	Workforce De	ata (if so identify	v the table)				
Specific Wor				y the table)				
Table:	kiorce Data	Workforce Data Table - B1						
STATEMEN CONDITION A TRIGGER POTENTIAI	THAT WAS	Critical Occup series (0132),	pations; Attorne General Inspect	y/General Atto tion, Investigat	orney (0905), tion, Enforce	lified internal applicants for Mission and Intelligence Research Specialist job ment and Compliance Series (1801) and oal(s) of 12% and 2%.		
Provide a brie describing the issue.								
How was the or recognized as barrier?								
STATEMEN		Barrier Grou	р					
BARRIER G	ROUPS:	People with I	Disabilities					
		People with '	Targeted Disabi	lities				
Barrier Anal Completed?:	ysis Process	Y						
Barrier(s) Ide	entified?:	Y						
STATEMEN	-	Barri	er Name	D	escription of	Policy, Procedure, or Practice		
IDENTIFIEI		Architectural	al Barrier Architectural Barriers h Washington, DC.			have been identified at ICE facilities in		
of the agency procedure	cinct statement policy,	Physical Barr			Physical requirement barriers have been identified regarding Law Enforcement positions.			
or practice that determined to of the undesired con-	be the barrier	Law Enforce	aw Enforcement Barrier		A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding Law Enforcement and non- Law Enforcement positions.			
		1	Objective(s) a	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2019	12/31/2021	Yes			To increase the number of PWD and PWTD selection among qualified internal applicants for Mission Critical Positions.			
			Respo	nsible Officia	l(s)			
	Title		<b>1</b>	Name		Standards Address The Plan?		
Assistant Director, ODCR			Scott Lanum			Yes		
(A) Deputy Chief, Diversity Management Division, ODCR		Management	Carolyn L. Leary			Yes		
Deputy Assist	Deputy Assistant Director, ODCR		Robin Kilgore			Yes		
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes		
(A) Chief, Div Division, OD	versity Managei CR	nent	Rita Bhanot Yes			Yes		

	Planned Activities Toward Completi	on of Objective					
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date			
09/30/2019	Monitor updates regarding the availability of updated Internal Applicant Data.	No		09/30/2019			
09/30/2020	Conduct barrier analysis to determine if triggers exist, once data is available.	No	09/30/2021				
09/30/2020	Coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information broken down by grade level.	No		09/30/2020			
	Report of Accomplishme	ents					
Fiscal Year	Accomplis	hment					
2019	Applicant Flow Data was obtained via the USA Staffing portal which provides information regarding internal competitive promotions.						
2019	Barrier analysis was implemented in FY 2019, with a focu requirements for employees throughout the ICE workforce noted potential barriers in regard to physical requirements, maintain a current driver's license, for both Law Enforcem	e. Review of positi , inability to contro	on descriptions fo ol meal times, and	r the 1801 serie necessity to			
2020	Additional data is available from USA Staffing which con Competitive promotions for Mission Critical Positions acr all certificates for a vacancy have been audited.						
2020	ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.						
2020	3. If the planned activities did not correct the trigger(s) and to improve the plan for the next fiscal year. Applicant Flow Data was obtained via the USA Staffing p competitive promotions. However, although ICE was able the barrier. The information available provides information the workforce and not broken down by grade level. The Di USA Staffing point of contact to determine if a custom rep internal competitive promotions information broken down	ortal which provid to obtain this data n regarding interna isability Program I port can be develop	les information reg , it did not assist u Il competitive pro Manager will coor	garding internal is in eliminating motions across dinate with the			
2020	<ul> <li>Internal competitive promotions information broken down by grade level.</li> <li>2. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).</li> <li>The availability of Applicant Flow Data included in the MD-715 tables and USA Staffing provided ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data.</li> </ul>						

Source of the	Trigger:	Workforce Data (if so identify the table)				
Specific Work Table:		Workforce Da	/orkforce Data Table - B1			
CONDITION THAT WASCritical OccurA TRIGGER FOR Acompared toPOTENTIAL BARRIER:internal appl(0132), and 0			pations; Attorney the goal(s) of 129 cants for Mission	y/General Atto % and 2%. ICl n Critical Occu n, Investigatio	orney (0905), E has a trigge apations; Inte	lified internal applicants for Mission and Criminal Investigator Series (1811) as r involving PWTD among qualified lligence Research Specialist job series ent and Compliance Series (1801)
How was the c recognized as a barrier?						
STATEMENT		Barrier Grou	ıp			
BARRIER GI	<b>KOUPS:</b>	People with I				
		People with	Targeted Disabil	lities		
Barrier Analy Completed?:	sis Process	Y				
Barrier(s) Ide	ntified?:	Y				
STATEMENT		Barri	ier Name	D	escription of	Policy, Procedure, or Practice
<b>IDENTIFIED BARRIER:</b> Provide a succinct statement of the agency policy, procedure		Law Enforcement Barrier Architectural Barrier		A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding Law Enforcement, and non- Law Enforcement positions. Architectural Barriers have been identified at ICE facilities in		
or practice that determined to I				Washington, DC.		
of the undesired cond	lition.	Physical Barr	rrier Physical requirement barriers have been identified regarding Lav Enforcement positions.			iers have been identified regarding Law
			Objective(s) and Dates for EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description
10/01/2019	12/31/2021	Yes			To increase the number of PWD and PWTD selections among qualified internal applicants for Mission Critical Positions.	
			Respo	nsible Officia	l(s)	
	Title			Name		Standards Address The Plan?
Disability Prog	gram Manager,	ODCR	Lynn Dickson			Yes
(A) Deputy Ch Division, ODC	nief, Diversity M CR	Management	Carolyn L. Leary			Yes
Deputy Assistant Director, ODCR		DCR	Robin Kilgore			Yes
Assistant Dire	ctor, ODCR		Scott Lanum			Yes
(A) Chief, Div Division, ODC	ersity Manager CR	ment	Rita Bhanot			Yes

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Planned Activities Toward Completion of Objective								
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date				
09/30/2019	Monitor updates regarding the availability of updated internal applicant data.	No	No 09/30/2019					
09/30/2020	Conduct barrier analysis to turn determine if triggers exist, once data is available.	No	09/30/2020					
09/30/2020	Coordinate with the USA staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information broken down by grade level.	No	09/30/2020					
01/31/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No						
06/30/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No						
	Report of Accomplishme	ents						
Fiscal Year	Accomplishment							
2019	Applicant Flow Data was obtained via the USA Staffing portal which provides information regarding internal competitive promotions.							
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers in regard to physical requirements, inability to control meal times, and necessity to maintain a current driver's license, for both Law Enforcement Officers and non-Law Enforcement Officers.							
2020	Additional data was obtained from USA Staffing which provides information regarding Internal Competitive promotions for Mission Critical Occupations across all grades, once the closed and all certificates for the vacancy have been audited.							
2020	ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.							
2020	2. For the planned activities that were completed, please de eliminating the barrier(s). The availability of Applicant Flow Data from USA Staffin whether the information provided is sufficient for conduct as determining next steps to obtain additional data. Completion of the additional barrier analysis allowed ODO LEO positions throughout ICE. Potential barriers are related driver's license, strenuous physical activity, vision/hearing identified as potentially impacting separation for PWD and	ng provided ICE the ing the needed and CR to identify pote ed to the requirements and	e ability to review lysis of the ICE v ntial barriers for 1 ent to obtain and 1 dexterity require	v and determine vorkforce, as well LEO and non- naintain a				

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Source of the	Trigger:	Workforce Data (if so identify the table)							
Specific Workforce Data		Workforce Data Table - B1							
Table:									
STATEMENT OF CONDITION THAT WAS A TRIGGER FOR A POTENTIAL BARRIER:		The lower than expected participation of PWD and PWTD in the permanent workforce, regarding grade GS-11 to SES, as compared to the goal of 12% and 2% respectively.							
Provide a brief narrative describing the condition at issue.									
How was the condition recognized as a potential barrier?									
STATEMENT OF BARRIER GROUPS:		Barrier Group							
		People with Disabilities							
		People with Targeted Disabilities							
Barrier Analysis Process Completed?:		Y							
Barrier(s) Ide	ntified?:	Y							
STATEMENT		Barrier Name Description of			Policy, Procedure, or Practice				
IDENTIFIED BARRIER:				Architectural Barriers have been identified at ICE facilities in Washington, DC.					
Provide a succinct statement of the agency policy, procedure		Physical Barrier		Physical requirement barriers have been identified regarding Law Enforcement positions.					
or practice that has been determined to be the barrier of the undesired condition.		Law Enforcement Barrier		A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding LEO, and non-LEO positions.					
Objective(s) and Dates for EEO Plan									
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed	Objective Description				
10/01/2019	12/31/2021	Yes			To resolve architectural barriers for GS-11 to SES in the permanent workforce regarding PWD.				
	<b>Responsible Official(s)</b>								
Title			Name			Standards Address The Plan?			
Disability Program Manager, ODCR			Lynn Dickson			Yes			
(A) Chief, Diversity Management Division, ODCR			Rita Bhanot			Yes			
Assistant Director, ODCR			Scott Lanum			Yes			
Deputy Assistant Director, ODCR			Robin Kilgore			Yes			
(A) Deputy Chief, Diversity Management Division, ODCR			Carolyn L. Leary Yes						

Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2019	Conduct barrier analysis to identify any potential barriers.	No	06/30/2020	
09/30/2019	Coordinate with SPPC and recruiting to provide information regarding reasonable accommodation to perspective job applicants at community events.	No	09/30/2020	09/30/2020
09/30/2019	Conduct a pilot walkthrough of ICE facilities in Washington DC to identify architectural barriers.	Yes	12/31/2021	
12/30/2019	Conduct a pilot walkthrough of ICE facilities in Baltimore to identify architectural barriers.	Yes	12/31/2021	
12/30/2019	Conduct a pilot walk through of ICE facilities in Baltimore to identify architectural barriers.	Yes	12/31/2021	
06/30/2020	Develop reasonable accommodation materials to be provided to prospective job applicants.	No		11/07/2019
06/30/2020	Develop a state by state list of universities and colleges who provide career development services for individuals with disabilities.	No		09/26/2020
08/30/2020	Develop training for F-SEPMS regarding the identification of architectural barriers.	No		08/30/2020
09/30/2020	Develop a state-by-state list of local disability agencies that serve potential job candidates.	No		08/30/2020
09/30/2020	Develop reasonable accommodation materials to be provided to prospective job applicants at community events.	No		03/10/2020
09/30/2020	Develop marketing materials to provide to colleges that provide career development services for individuals with disabilities.	No		03/10/2020
09/30/2020	Draft a plan to address identified architectural barriers for ICE facilities in Washington DC.	Yes		09/11/2020
09/30/2020	Establish a national strategy to conduct the architectural barrier investigations of ICE facilities.	Yes		09/11/2020
09/30/2020	Draft a plan to expand assessments related to architectural barriers to other geographic locations.	Yes		09/11/2020
12/31/2020	Implement resolutions for identified architectural barriers for facilities in Washington DC.	Yes	12/31/2021	
01/31/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No	12/31/2021	
06/30/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No		
09/30/2021	Draft a plan to address identified barriers for ICE facilities in Baltimore.	No		09/11/2020
12/31/2021	Implement resolutions for identified architectural barriers for ICE facilities in Baltimore.	Yes	12/31/2021	
01/31/2021	Provide training for F-SEPMS for conducting	Yes		

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	Report of Accomplishments
Fiscal Year	Accomplishment
2020	ODCR developed reasonable accommodation materials to be provided to perspective job applicants at community events and coordinated with the SPPC to ensure distribution.
2020	A state by state list of local disability agencies whom serve potential job candidates was developed.
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control mealtimes, and necessity to maintain a current driver's license, for both LEO and non-LEO positions.
2020	3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year. ODCR will shift the focus of Architectural Barrier Assessments from completing assessments to training of F-SEPM's and preparation of assessment tools, due to restrictions in place related to the COVID-19 pandemic. As individual offices reopen under the ICE Reconstitution plan Architectural Barrier Assessments will be initiated by the F-SEPM's. Barrier analysis will continue in FY 2021 with a focus on position descriptions and transitioning to a review of policies and procedures.
2019	OCDR coordinated with the General Services Administration (GSA) and the Architectural Barriers Board to obtain information regarding the Architectural Barriers requirements and checklists for conducting Architectural Barriers walk-throughs.
2019	ODCR conducted seven (7) Architectural Barrier Assessments of ICE facilities in Washington, DC.
2020	The DPM prepared a training presentation for F-SEPMS regarding the identification of architectural barriers. The presentation is currently being reviewed in order to add relevant information regarding COVID-19.
2020	1. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. The ongoing COVID-19 restrictions has impacted the agency's ability to complete the scheduled Architectural Barrier Assessments, as at this time ICE employees are teleworking to the maximum extent possible based on their location, local pandemic related restrictions, and restrictions in place under the ICE Reconstitution Plan.
2020	ODCR developed reasonable accommodation materials to be provided to Disability program POCs at colleges that provide career development services for individuals with disabilities.
2020	A plan to address architectural barriers in the Washington DC metro area was established along with a plan to conduct Architectural Barrier Assessments nationally with the assistance of the F-SEPM's.
2020	2. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s). The Architectural Barrier assessments which were completed provided valuable information which will be used to establish the plan for resolving the identified barriers. Barriers identified included issues such as absence of electronic door openers, inaccessible kitchen areas or pantries, inaccessible file cabinets, and inaccessible maps or notices for visually impaired employees.

Source of the	Trigger	Workforce D	ata (if so identif	v the table)				
Specific Worl Table:			ata Table - B1	,				
STATEMEN CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	The lower that programs.	an expected parti	icipation of PW	D applicant	s and or selectees for career development		
Provide a bries describing the issue.								
How was the c recognized as barrier?								
STATEMEN'		Barrier Grou	ıp					
BARRIER G	KUUPS:	People with I	Disabilities					
Barrier Analy Completed?:	ysis Process	Y						
Barrier(s) Ide	entified?:	N	N					
STATEMEN'	-	Barrier Name Description of			Policy, Procedure, or Practice			
IDENTIFIED	BAKKIEK:	Not Identified To date no barrier has been i			en identified.			
Provide a succ of the agency procedure or practice tha determined to of the undesired cond	policy, t has been be the barrier							
		•	Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2019	12/31/2021	Yes			Identify potential barriers to participation and enhance data gathering for PWTD participants for Career Development Programs.			
			Respo	onsible Officia	l(s)			
	Title			Name		Standards Address The Plan?		
(A) Deputy C Division, OD	hief, Diversity I CR	Management	Catolyn L. Leary			Yes		
(A) Chief, Diversity Management Division, ODCR		ment	Rita Bhanot			Yes		
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes		
	ant Director, O	DCR	Robin Kilgore			Yes		
Assistant Dire	ctor, ODCR		Scott Lanum			Yes		

	Planned Activities Toward Completie	on of Objective		•
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date
09/30/2019	9 Schedule a meeting with the office of leadership and No career development OLCD to review data gathering requirements.			03/27/2019
10/31/2019	Schedule a meeting with the ICE Chiefs of staff office to discuss detail assignments and data gathering requirements.	12/31/2020		
11/30/2019	Schedule a meeting with the office of leadership in career development to discuss internship and fellowship programs and data gathering requirements.	No	11/30/2020	10/13/2020
12/31/2019	Schedule a meeting with the PALMS point of contact to ensure information is available regarding reasonable accommodations.	No	09/30/2020	09/30/2020
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
09/30/2020	ICE broadcast to workforce informing them that reasonable accommodations are available for individuals participating in career development programs.	No	09/30/2021	
09/30/2020	Develop Reasonable Accommodation marketing materials that can be distributed by OLCD and other ICE career development programs, providing information on how to request an RA for participation in a career development program.	No		03/10/2020
09/30/2020	Disability Awareness month fair, to include community partner demonstrations, info sessions, and career development sessions.	No	10/09/2019	
09/30/2021	Collaborate with OLCD to update the website regarding Reasonable Accommodations an ensure 508 compliance.	No		
12/31/2019	Coordinate with leadership and career development to ensure all announcements contain instructions for requesting a reasonable accommodation.	No		03/28/2020
	Report of Accomplishme	nts		
Fiscal Year	Accomplis	hment		
2019	ODCR staff and OLCD staff discussed the need to provide OLCD's.	reasonable accom	modation information	ation for each of
2020	2. For the planned activities that were completed, please de eliminating the barrier(s). Throughout FY 2020 the Disability program manager work training programs, to obtain the data needed to determine if PWTD in career development programs. The data received & PWTD participation in career development programs. As between LEO and no-LEO participation in the various care	ted with divisions f ICE has triggers allowed ODCR to dditionally, the da	throughout ICE, a related to particip o identify triggers ta allowed ODCR	as well as DHS ation of PWD & related to PWD
2020	3. If the planned activities did not correct the trigger(s) and to improve the plan for the next fiscal year. ODCR will continue to work with divisions throughout ICI additional data related to participation in career developme various divisions to review the data in order to identify pote individual divisions.	/or barrier(s), plea E, as well as DHS nt programs. ODO	ase describe how t training programs CR will begin mee	s, to gain ting with the

## DHS Immigration and Customs Enforcement

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	Report of Accomplishments						
Fiscal Year	Accomplishment						
2020	1. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. The OLCD insight page is in the process of being modified, therefore the ICE Broadcast regarding the provision of reasonable accommodations quit participating in career development programs was not issued during FY 2020. In coordination with OLCD the decision was made to modify the completion date to allow for the new OLCD insight page to be completed and posted which will contain information regarding the availability of reasonable accommodations for training program						
2019	ODCR staff and OLCD staff reviewed the application for OLCD programs an insure it contains information for requesting a reasonable accommodation.						
2019	ODCR met with OLCD to discuss the requirements for data collection. As a result of that meeting, A means to provide ODCR when the needed data was developed.						
2020	The Disability Program manager met with OLCD staff regarding internship and fellowship programs. OLCD does not administer these programs and thus cannot assist with data gathering requirements. However, OLCD provided the names and contact information for the individuals who do administer internship and fellowship programs for ICE.						
2020	The Disability Program manager met with the PALMS administrator regarding reasonable Accommodations for employees completing online training. Per the PALMS administrator information regarding reasonable accommodations is not posted PALMS due to their mandate that each training posted must be 508 compliant.						

## DHS Immigration and Customs Enforcement

Source of the	Trigger:	Workforce Da	ata (if so identify	y the table)			
Specific Work Table:	force Data	Workforce Da	ata Table - B1				
STATEMENT CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	11-20 hours, 2		1 31-40 hours;	as well as ca	TD whom received time off awards of sh awards of \$1,000-\$1999, \$2,000-\$2,999,	
Provide a brief describing the issue.							
How was the c recognized as a barrier?							
STATEMENT OF		<b>Barrier Grou</b>	p				
BARRIER GI	KOUPS:	People with I					
			Targeted Disabi	lities			
Barrier Analy Completed?:	sis Process	Y					
Barrier(s) Identified?: Y							
STATEMENT	-	Barrier Name Description of Policy, Procedure, or Practice				Policy, Procedure, or Practice	
IDENTIFIED	BARRIER:	Unidentified	Unidentified To date no barrier has been identified.				
Provide a succ of the agency p procedure or practice that determined to of the undesired conc	policy, t has been be the barrier						
			Objective(s) a	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/31/2021	Yes				resolve potential barriers regarding PWD within the awards programs.	
			Respo	nsible Officia	l(s)		
	Title			Name		Standards Address The Plan?	
Disability Prog	gram Manager,	ODCR	Lynn Dickson			Yes	
	(A) Chief, Diversity Management Division, ODCR		Rita Bhanot			Yes	
Deputy Assist	ant Director, Ol	DCR	Robin Kilgore			Yes	
Assistant Dire	ctor, ODCR		Scott Lanum			Yes	
(A) Deputy Ch Division, ODC	nief, Diversity M CR	Management	Carolyn L. Leary Yes			Yes	

	Planned Activities Toward Completi	on of Objective						
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date				
09/30/2019	Conduct additional analysis to identify any potential barriers.	No	09/30/2020	09/30/2020				
09/30/2020	Conduct a focus group with supervisors.	Yes		11/06/2019				
12/31/2020	Conduct a focus group with employees.	Yes		11/06/2019				
01/31/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No						
06/30/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No						
	Report of Accomplishme	ents						
Fiscal Year	Accomplis	hment						
2020	A focus group was conducted with employees representing at times it seems that supervisors consider the employees of received.							
2019	Barrier analysis was implemented and focused on identify employees throughout the ICE workforce. Review of posit potential barriers regarding physical requirements, inabilit current driver's license, for both LEO and non-LEO positi	ion descriptions for y to control mealti	or the 1801 series	identified				
2020	1. Please explain the factor(s) that prevented the agency fr Barrier analysis continued throughout FY 2020, however, unable to complete the review of position descriptions and	due to the contract	ors limited availa	bility ODCR wa				
2020	<ul><li>2. For the planned activities that were completed, please de eliminating the barrier(s).</li><li>The focus groups provided information to direct additional</li></ul>		mpact of those ac	tivities toward				
2020	<ul> <li>3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.</li> <li>ICE will continue with barrier analysis an FY 2021 transitioning from the review of position descriptions to the review of pertinent policies. Based on information gained from the focus groups ODCR will conduct further research related to awards. Specifically, ODCR will conduct an analysis award data related to LEO, non-LEO, as well as by directorate to identify any potential barriers or pattern in regard to the provision of awards.</li> </ul>							
2020	Barrier analysis continued in FY 2020 resulting in the identification of barriers for LEO and non-LEO positions as it relates to physical requirements and the need to obtain and maintain a driver's license.							
2020		ould not readily id	A focus group was held with supervisors representing OPLA and ERO. The supervisors shared that awards are provided based on year end performance appraisals, and could not readily identify reasons why PWD and					

Source of the	Trigger:	Workforce D	ata (if so identif	v the table)			
Specific Work			ata Table - B1	y une uere)			
STATEMENT CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A	The lower tha 2020.	in expected repr	esentation of P	WTD whom	received Quality Step Increases in FY	
Provide a brief describing the o issue.							
How was the correcognized as a barrier?							
STATEMENT		Barrier Grou	ıp				
BARRIER GH	KOUPS:	People with I	Disabilities				
		People with	Targeted Disabi	lities			
Barrier Analy Completed?:	sis Process	Y	Y				
Barrier(s) Ide	ntified?:	N					
STATEMENT		Barrier Name Description o			f Policy, Procedure, or Practice		
IDENTIFIED	<b>BARRIER:</b>	Unidentified		To date no ba	arrier has bee	en identified.	
Provide a succi of the agency p procedure or practice that determined to b of the undesired cond	oolicy, has been be the barrier						
			Objective(s)	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/31/2021	Yes			Identify and resolve potential barriers regarding PWTD in regard to receiving Quality Step Increases		
			Respo	nsible Officia	l(s)		
	Title			Name		Standards Address The Plan?	
(A) Chief, Div Division, ODC		nent	Rita Bhanot			Yes	
Assistant Director, ODCR			Scott Lanum			Yes	
(A) Deputy Ch Division, ODC		Management	Carolyn L. Leary			Yes	
Disability Prog	gram Manager,	ODCR	Lynn Dickson			Yes	
Deputy Assista	ant Director, O	DCR	Robin Kilgore Yes			Yes	

Target Date	Planned Activities	Sufficient Staffing &	Modified Date	Completion Date	
03/30/2020	Conduct additional analysis to identify any potential barriers.	Funding? No	09/30/2020	09/30/2020	
09/30/2020	Conduct a focus group with supervisors.	No		11/06/2019	
01/31/2021	Conduct a focus group with employees.	No		11/06/2019	
03/30/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No			
06/30/2021	Implement plans of action to resolve identified barriers.	No			
	Report of Accomplishme	ents			
Fiscal Year	Accomplis	hment			
2012	2. For the planned activities that were completed, please de eliminating the barrier(s). The focus groups provided information to direct additional		mpact of those ac	tivities toward	
2020	3. If the planned activities did not correct the trigger(s) and to improve the plan for the next fiscal year. ICE will continue with barrier analysis an FY 2021 transiti review of pertinent policies. Based on information gained to research related to awards. Specifically, ODCR will condu- as well as by directorate to identify any potential barriers of	oning from the re- from the focus gro ct an analysis awa	view of position d ups ODCR will co rd data related to 1	escriptions to th onduct further LEO, non-LEO	
2020	1. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. Barrier analysis continued throughout FY 2020, however, due to the contractors limited availability ODCR was unable to complete the review of position descriptions and move forward with a review of pertinent policies.				
2020	A focus group was conducted with employees representing ERO, M&A, and OCIO. The employees shared that at times it seems that supervisors consider the employee's disability status when determining the type of award received.				
2020	A focus group was held with supervisors representing OPLA and ERO. The supervisors shared that awards are provided based on year-end performance appraisals, and could not readily identify reasons why PWD and PWTD employees are receiving fewer awards than their colleagues.				

Source of the	Trigger:	Workforce Da	ata (if so identif	y the table)			
Specific Worl Table:	kforce Data	Workforce Da	ata Table - B1				
STATEMEN CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A		ger involving P garding GS-13			al applicants and/or selectees for 4 to SES.	
Provide a brie describing the issue.							
How was the c recognized as barrier?							
STATEMEN		Barrier Grou	p p				
BARRIER G	ROUPS:	People with I	Disabilities				
		People with '	Targeted Disabi	lities			
Barrier Analy Completed?:	ysis Process	Y					
Barrier(s) Ide	entified?:	Y					
STATEMEN		Barrier Name Description o			f Policy, Procedure, or Practice		
IDENTIFIED		Architectural	Barrier	Architectural Barriers have been identified at ICE facilities in Washington, DC.			
of the agency	vinct statement policy,	Physical Barr	rier	Physical requirement barriers have been identified regarding Law Enforcement positions.			
or practice tha determined to of the undesired con-	be the barrier	Law Enforcement Barrier		A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding Law Enforcem positions, and non- Law Enforcement positions.			
			Objective(s)	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/31/2021	Yes		To increase the number of PWD selections among qualified internal applicants for promotions regard GS-13 to SES and PWTD to GS-14 to SES.		ternal applicants for promotions regarding	
			Respo	onsible Officia	l(s)		
	Title			Name		Standards Address The Plan?	
Deputy Assist	ant Director, O	DCR	Robin Kilgore			Yes	
	(A) Chief, Diversity Management Division, ODCR		Rita Bhanot			Yes	
Assistant Director, ODCR			Scott Lanum			Yes	
(A) Deputy C Division, OD	hief, Diversity I CR	Management	Carolyn L. Lear	ry		Yes	
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes	

	Planned Activities Toward Completi	on of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date		
09/30/2019	Monitor updates regarding availability of updated Internal Applicant Data.	No		09/30/2019		
09/30/2020	Conduct barrier analysis to identify potential triggers, upon receipt of updated available.	No		09/30/2020		
01/31/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No				
06/30/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No				
	Report of Accomplishme	ents				
Fiscal Year	Accomplis	hment				
2019	Applicant Flow Data was obtained via the USA Staffing p competitive promotions.	ortal which provide	es information re	garding internal		
2019	Barrier analysis was implemented and focused on identify employees throughout the ICE workforce. Review of positi potential barriers in regard to physical requirements, inabi- current driver's license, for both LEO and non-LEO positi	tion descriptions fo lity to control meal	r the 1801 series	identified		
2020	ODCR conducted a review of 191 position descriptions to positions. Potential barriers related to the requirement to o physical activity, vision/hearing requirements and dexterit impacting separation for PWD and PWTD employees.	btain and maintain	a driver's license	e, strenuous		
2020	Additional data was obtained from USA Staffing which provides information regarding Internal Competitive promotions for Mission Critical Occupations across all grades, once the closed and all certificates for the vacancy have been audited.					
2020	<ol> <li>For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s).</li> <li>The availability of Applicant Flow Data from USA Staffing provided ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data. The completed barrier analysis identified specific barriers for employees in LEO and non-LEO positions. This information provides a basis for ODCR to begin dialogues with OHC and ICE Directorates regarding the barriers to determine if the specific barrier truly exists.</li> </ol>					
2020	<ul> <li>3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.</li> <li>Barrier analysis will continue during FY 2021. The focus will be to complete the review of position descriptions and transition to a review of pertinent policies.</li> </ul>					

Source of the	Trigger:	Workforce Da	ata (if so identify	y the table)			
Specific Worl Table:	kforce Data	Workforce Da	ata Table - B1	-			
STATEMEN CONDITION A TRIGGER POTENTIAL	THAT WAS FOR A		n anticipated ra -14 to SES and 1			lified applicant pool for PWD new hires - 13 to SES.	
Provide a brief describing the issue.							
How was the c recognized as barrier?							
STATEMEN		Barrier Grou	<i>p</i>				
BARRIER G	ROUPS:	People with I	Disabilities				
		People with '	Targeted Disabi	lities			
Barrier Analy Completed?:	ysis Process	Y					
Barrier(s) Ide	entified?:	Y					
STATEMEN'	-	Barri	Barrier Name Description of			Policy, Procedure, or Practice	
IDENTIFIED		Physical Barr	Physical Barrier		Physical requirement barriers have been identified regarding Law Enforcement positions.		
Provide a succ of the agency procedure		Architectural Barrier		Architectural Barriers have been identified at ICE facilities in Washington, DC.			
or practice tha determined to of the undesired cond	be the barrier	Law Enforcement Barrier		A barrier has been identified related to the obtaining and maintaining a valid drivers licenses and ability to drive a government vehicle during duty hours regarding Law Enforcer positions, and non- Law Enforcement positions.		s licenses and ability to drive a g duty hours regarding Law Enforcement	
			Objective(s)	and Dates for	EEO Plan		
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019	12/31/2021	Yes			To identify and resolve potential barriers, resulting i an Increase in the number of PWD selectees for GS- to SES.		
			Respo	onsible Officia	l(s)		
	Title		<b>^</b>	Name		Standards Address The Plan?	
Deputy Assist	ant Director, O	DCR	Robin Kilgore			Yes	
Assistant Director, ODCR			Scott Lanum			Yes	
(A) Chief, Div Division, OD	versity Manager CR	nent	Rita Bhanot			Yes	
(A) Deputy C Division, OD	hief, Diversity I CR	Management	Carolyn L. Lear	ry		Yes	
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes	

	Planned Activities Toward Completi	on of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date		
09/30/2019	Conduct additional analysis to identify any potential barriers.	No	09/30/2020	09/30/2020		
01/31/2020	Implement plans of action to resolve barriers identified via barrier analysis.	No	12/31/2021			
09/30/2020	Develop a list of state by state disability agencies whom serve potential job candidates.	No		09/08/2020		
09/30/2019	Develop reasonable accommodation materials to be provided to perspective job applicants at community outreach events.	No	06/30/2020	03/10/2020		
12/31/2019	Coordinate with SPPC and recruiting to provide information regarding reasonable accommodations to perspective job applicants at community events.	No	09/30/2020	09/30/2020		
09/30/2020	Develop marketing materials to provide to colleges whom provide career development services for individuals with disabilities.	No		03/10/2020		
06/30/2020	Draft a plan of action to resolve barriers identified via barrier analysis.	No	12/31/2021			
	Report of Accomplishme	ents				
Fiscal Year	Accomplis	hment				
2020	A state by state list of local disability agencies whom serve	e potential job can	didates was develo	oped.		
2020	1. Please explain the factor(s) that prevented the agency from Barrier analysis continued throughout FY 2020, however, of unable to complete the review of position descriptions and The ongoing COVID-19 restrictions has impacted the agent Architectural Barriers. At this time ICE employees are tele their location, local pandemic related restrictions, and restr Thus, employees are not working in offices where Architect agency is in the process of a Workforce Transformation Im footprint throughout the Continental United States. The idea resolutions developed once it has been determined if the A which the barriers were identified. The completion date for identified Architectural Barriers has been modified to Dece pandemic.	due to the contrac move forward wi acy's ability to tim working to the ma- ictions in place un ctural Barriers hav itiative (WTI) wh entified Architectu gency will continu- r implementing a p	tors limited availal th a review of pert hely address the ide aximum extent pos- nder the ICE Recor- ve been identified. ich will change the ural Barriers will b ue to utilize the off plan of action to ac	bility ODCR w inent policies. entified ssible based on nstitution Plan. Additionally, tle agencies e reviewed, and fice space in ddress the		
2020	3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intend to improve the plan for the next fiscal year. ODCR will shift the focus of Architectural Barrier Assessments from completing assessments to training of F-SEPM's and preparation of assessment tools, due to restrictions in place related to the COVID-19 pandemic. As individual offices reopen under the ICE Reconstitution plan Architectural Barrier Assessments will be initiated by the F-SEPM's. Barrier analysis will continue in FY 2021 with a focus on position descriptions and transitioning to a review of policies and procedures.					
2020	<ol> <li>For the planned activities that were completed, please de eliminating the barrier(s).</li> <li>The Architectural Barrier assessments which were complete to establish the plan for resolving the identified barriers. Barlectronic door openers, inaccessible kitchen areas or pantr or notices for visually impaired employees.</li> </ol>	ted provided valua arriers identified i	able information w ncluded issues suc	hich will be use thas absence of		

## DHS Immigration and Customs Enforcement

	Report of Accomplishments						
Fiscal Year	Accomplishment						
2020	ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.						
2020	ODCR developed reasonable accommodation materials to be provided to prospective job applicants at community events and coordinated with the SPPC to ensure distribution.						
2020	The DPM prepared a training presentation for F-SEPMS regarding the identification of architectural barriers. The presentation is currently being reviewed in order to add relevant information regarding COVID-19.						
2020	ODCR developed reasonable accommodation materials to be provided to Disability program POCs at colleges whom provide career development services for individuals with disabilities.						
2020	A plan to address architectural barriers in the Washington DC metro area was established along with a plan to conduct Architectural Barrier Assessments nationally with the assistance of the F-SEPM's.						

Source of the Trigger:	Workforce D	Workforce Data (if so identify the table)					
Specific Workforce Data Table:	Workforce D	Workforce Data Table - B1					
STATEMENT OF CONDITION THAT WA A TRIGGER FOR A POTENTIAL BARRIER	<b>S</b> selectees for	ICE has a perceived trigger involving PWD and PWTD among qualified internal applicants and/or selectees for promotions to supervisory positions.					
Provide a brief narrative describing the condition a issue.							
How was the condition recognized as a potential barrier?							
STATEMENT OF	Barrier Gro	ир					
BARRIER GROUPS:	People with	Disabilities					
	-	Targeted Disab	ilities				
Barrier Analysis Process Completed?:	Y						
Barrier(s) Identified?:	Y						
STATEMENT OF		rrier Name Description of Policy, Procedure, or Pra			f Policy, Procedure, or Practice		
<b>IDENTIFIED BARRIEF</b> Provide a succinct statemet	Applicant FI	t Flow Data Applicant flow data is not available regarding qualif applicants per grade level.					
of the agency policy, procedure	Physical Bar	arrier Physical requirement barriers have been identified regar Enforcement positions.			iers have been identified regarding Law		
or practice that has been determined to be the barrie of the undesired condition.		ement Barrier	A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive government vehicle during duty hours regarding Law En positions, and non- Law Enforcement positions.		's licenses and ability to drive a g duty hours regarding Law Enforcement		
	Architectura	l Barrier	Architectural Washington,	itectural Barriers have been identified at ICE facilities in hington, DC.			
		Objective(s)	and Dates for	EEO Plan			
Date Target Da Initiated	te Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2019 12/31/202	Yes			Obtain applicant flow data for qualified internal applicants.			
· · · · · · · · · · · · · · · · · · ·		Respo	onsible Officia	l(s)			
Title			Name	. /	Standards Address The Plan?		
Disability Program Manager, ODCR		Lynn Dickson			Yes		
(A) Deputy Chief, Diversity Management Division, ODCR		Carolyn L. Leary			Yes		
Deputy Assistant Director, ODCR		Robin Kilgore			Yes		
(A) Chief, Diversity Management Division, ODCR		Rita Bhanot			Yes		
Assistant Director, ODCR		Scott Lanum			Yes		

	Planned Activities Toward Complet	ion of Objective				
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date		
09/30/2019	Monitor updates regarding the availability of updated Internal Applicant Data.	No		09/20/2019		
09/30/2020	Conduct barrier analysis to identify potential triggers upon receipt of updated data.	No		09/30/2020		
09/30/2021	Draft a plan of action to resolve barriers identified via barrier analysis.	No				
12/31/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No				
	Report of Accomplishme	ents				
Fiscal Year	Accomplis	shment				
2020	ODCR conducted a review of 191 position descriptions to positions. Potential barriers related to the requirement to o physical activity, vision/hearing requirements and dexterit impacting separation for PWD and PWTD employees.	btain and maintain	a driver's license	e, strenuous		
2019	Barrier analysis was implemented in FY 2019, with a focu requirements for employees throughout the ICE workforce		rriers in relation t	to physical		
2020	<ul><li>2. For the planned activities that were completed, please d eliminating the barrier(s).</li><li>The identification of barriers related to obtaining and main vision/hearing requirements and dexterity requirements we PWD and PWTD employees, provides a platform for cont ODCR needs to discuss the barriers identified in the position</li></ul>	ntaining a driver's l ere identified as po inued analysis, and on descriptions.	license, strenuous tentially impactin l identified the pa	physical activity of separation for rties with whom		
2019	Applicant flow data it was obtained via the USA staffing portal which provides information regarding internal competitive promotions.					
2020	3. If the planned activities did not correct the trigger(s) and to improve the plan for the next fiscal year. ICE was able to obtain Applicant Flow Data via the USA internal competitive promotions, However, available infor and not broken down by grade level. The Disability Progra templates and updated data fields in USA Staffing to deter that would provide the internal competitive promotions in	Staffing portal whi mation provides in am Manager will co mine if a custom r	ch included inform formation across ontinue to monito eport can be deve	mation regarding the workforce r the new report loped for ICE		

Source of the	Trigger:	Workforce Da	ata (if so identif	y the table)				
Specific Worl Table:	xforce Data	Workforce Da	Workforce Data Table - B1					
			The low number of selections of PWD among new hires to executive positions. The low number of selections of PWTD among new hires to manager, supervisor and executive positions.					
Provide a brief describing the issue.								
How was the c recognized as barrier?								
STATEMEN'		Barrier Grou	ıp					
BARRIER G	<b>BARRIER GROUPS:</b>		Disabilities					
		People with	Targeted Disabi	ilities				
Barrier Analy Completed?:	vsis Process	Y						
Barrier(s) Ide	entified?:	Y						
STATEMENT OF		Barri	arrier Name Description of Policy, Procedure, or Prac			f Policy, Procedure, or Practice		
	<b>IDENTIFIED BARRIER:</b> Provide a succinct statement		ural Barrier Architectural Barriers have been identified at ICE facil Washington, DC.			ve been identified at ICE facilities in		
of the agency procedure		Physical Barr	arrier Physical requirement barriers have been identified regard positions.			iers have been identified regarding LEO		
or practice that determined to of the undesired cond	be the barrier	Law Enforce	ment Barrier	A barrier has been identified related to the obtaining and maintaining a valid driver's licenses and ability to drive a government vehicle during duty hours regarding LEO, and non- positions.				
			Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2019	12/31/2021	Yes			To identify and resolve potential barriers resulting in an Increase in the number of PWD and PWTD selectees among new hires for managers and supervisors.			
			Respo	onsible Officia	l(s)			
	Title			Name		Standards Address The Plan?		
(A) Chief, Div Division, OD	versity Manager	ment	Rita Bhanot			Yes		
Assistant Director, ODCR		Scott Lanum			Yes			
Deputy Assistant Director, ODCR		DCR	Robin Kilgore			Yes		
(A) Deputy Cl Division, OD	hief, Diversity I CR	Management	Carolyn L. Leary			Yes		
Disability Pro	gram Manager,	ODCR	Lynn Dickson			Yes		

	Planned Activities Toward Completi	on of Objective					
Target Date	Planned Activities	Modified Date	Completion Date				
09/30/2019	Conduct additional analysis to identify any potential barriers.	No	09/30/2020	09/30/2020			
01/31/2020	Draft a plan of action to resolve barriers identified via barrier analysis.	No	12/31/2020				
06/30/2020	Implement plans of action to resolve barriers identified via barrier analysis.	No	12/31/2021				
	Report of Accomplishme	ents					
Fiscal Year	Accomplis	hment					
2019	Barrier analysis was implemented in FY 2019, with a focus on identifying barriers in relation to physical requirements for employees throughout the ICE workforce. Review of position descriptions for the 1801 series noted potential barriers regarding physical requirements, inability to control mealtimes, and necessity to maintain a current driver's license, for both LEO and non-LEO positions.						
2020	1. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities. Barrier analysis continued throughout FY 2020, however, due to the contractors limited availability ODCR was unable to complete the review of position descriptions and move forward with a review of pertinent policies. The complete dates for drafting an action plan and implementing the plans of action to resolve identified barriers are being modified in order to allow completion of the review of position descriptions in order to present OHC with a report related to barriers identified in position descriptions. The report will form the basis for discussions related to the identified barriers and determining if the barrier truly exists.						
2020	ODCR conducted a review of 191 position descriptions to positions. Potential barriers related to the requirement to of physical activity, vision/hearing requirements and dexterity impacting separation for PWD and PWTD employees.	btain and maintain	a driver's license	, strenuous			
2020	2. For the planned activities that were completed, please describe the actual impact of those activities toward eliminating the barrier(s). ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.						
2020	<ul> <li>3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.</li> <li>During FY 2021, ICE will continue with Barrier Analysis in order to identify any additional barriers related to the low number of selections of PWD among new hires to supervisory positions.</li> </ul>						

Source of the	Trigger:	Workforce D	ata (if so identif	y the table)				
Specific Work Table:			ata Table - B1	<u> </u>				
			A employees eli rs of satisfactory		ersion, were r	not converted into the competitive service		
Provide a brief describing the issue.								
How was the c recognized as a barrier?								
STATEMEN		Barrier Grou	ıp					
BARRIER GI	ROUPS:	People with l	Disabilities					
		People with	Targeted Disabi	lities				
Barrier Analy Completed?:	sis Process	Ν	N					
Barrier(s) Ide	ntified?:	N	1					
STATEMENT OF		Barri	Barrier Name Description of Policy, Procedure, or Practice					
IDENTIFIED	IDENTIFIED BARRIER:		Unidentified To date no barrier has been identified.					
Provide a succ of the agency p procedure or practice that determined to of the undesired cond	bolicy, has been be the barrier							
		I	Objective(s)	and Dates for	EEO Plan			
Date Initiated	Target Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description		
10/01/2019	12/31/2021	Yes			All schedule A employees eligible for conversion, will be converted into the competitive service after two years of satisfactory service.			
			Respo	onsible Official	l(s)			
Title				Name		Standards Address The Plan?		
Deputy Assistant Director, ODCR		DCR	Robin Kilgore			Yes		
Assistant Director, ODCR		Scott Lanum			Yes			
(A) Chief, Diversity Management Division, ODCR		nent	Rita Bhanot			Yes		
Disability Prog	gram Manager,	ODCR	Lynn Dickson			Yes		
(A) Deputy Ch Division, ODC	nief, Diversity I CR	Management				Yes		

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	Planned Activities Toward Completion	on of Objective					
Target Date	Planned Activities	Sufficient Staffing & Funding?	Modified Date	Completion Date			
09/30/2019	Schedule a meeting with RRPM to discuss the conversion of Schedule A employees.	No	09/30/2020	11/21/2019			
10/31/2019	Identify the Schedule A employees whom have not been converted to competitive service.	No		03/04/2020			
12/31/2019	Work with the RRPM to develop a tracking system to monitor and ensure the timely conversion of future Schedule A employees.No12/31/2020						
09/30/2020	Coordinate with OHC to ensure the supervisor of each Schedule A employee who has not been converted is contacted, to determine why the employee was not converted.						
04/30/2020	Coordinate with OHC to ensure eligible Schedule A candidates, whom have not been converted, are converted to competitive service.	No					
06/30/2020	Revise ODCR supervisor and manager training to include information regarding the conversion of Schedule A employees.	No		06/30/2020			
	Report of Accomplishme	nts					
Fiscal Year	Accomplish	nment					
2020	ODCR's managers and supervisors training contained infor employees.	mation regarding	the conversion of	Schedule A			
2020	All Schedule A employee's whom have not been converted	l were identified.					
2020	DPM met with the SPPC and RRPM to discuss the convers invitation of the RRPM, the DPM discussed this issue with			itionally, at the			
2020	2. For the planned activities that were completed, please de eliminating the barrier(s). The managers and supervisors whom participated in ODCR are aware of the need to facilitate the conversion of Schedu contact for assistance.	R's managers and	supervisors trainin	ng in FY 2020			
2020	3. If the planned activities did not correct the trigger(s) and to improve the plan for the next fiscal year. The Disability Team is including information regarding Scl Accommodation training presented throughout the year. ODCR will continue to meet with the new National Recruit for ensuring the Schedule A employee's pending conversio	hedule A conversion to the tention t	ions in the Reason on Manager to de	able			
2020	1. Please explain the factor(s) that prevented the agency fro The Chief Diversity Officer and the DPM met with represe the conversion of Schedule A employees. The SPPC and re- shared that individual supervisors are responsible to initiate tracking system was not established during FY 2020, as the been filled on a rotating basis by other members of OHC. H Officer met with the new National Recruitment and Retenti resolution of the Schedule A conversions via a series of me Although ODCR updated the managers and supervisors trai Schedule A conversions, the ongoing COVID-19 restriction training.	ntatives from the epresentatives from the conversion of SPPC retired in of lowever, in Octob ion Manager. OD0 etings with her du ining for FY 2020	Office of Human m the Office of H f Schedule A emp early FY 2020, an over 2020 the Actin CR anticipates rea uring FY 2021.	Capital regarding uman Capital loyees. A d the position has g Chief Diversity ching a			

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Source of the Trigge	er:	Workforce Da	ata (if so identif	y the table)			
Specific Workforce Table:		Workforce Da		,			
STATEMENT OF CONDITION THAT A TRIGGER FOR A POTENTIAL BARI	A	The higher the employees.	an average rate	of voluntary an	id involuntar	y separations among PWD and PWTD	
Provide a brief narrat describing the conditions issue.							
How was the condition recognized as a potent barrier?							
STATEMENT OF	a	Barrier Grou	p				
BARRIER GROUP	'S:	People with I					
		1	Targeted Disabi	lities			
Barrier Analysis Pro Completed?:	ocess	Y	ζ				
Barrier(s) Identified	ł?:	Y					
STATEMENT OF		Barri	Barrier Name Description of Policy, Proc			Policy, Procedure, or Practice	
IDENTIFIED BAR		Physical Req	uirements		Physical requirements could potentially impact the separation of PWD or PWTD employee.		
Provide a succinct sta of the agency policy, procedure or practice that has be determined to be the of the undesired condition.	een	Exit Interview	N	The exit interview does not include questions focused on the reaso for separation related to PWD or PWTD employees.			
			Objective(s)	and Dates for	EEO Plan		
Date Targ Initiated	get Date	Sufficient Funding / Staffing?	Date Modified	Date Completed		Objective Description	
10/01/2019 12/31	/2021	Yes			Lower Low rate of voluntary and involuntary separations among PWDs and PWTDs.		
			Respo	onsible Official	l(s)		
T	itle			Name		Standards Address The Plan?	
Disability Program N	Manager,	ODCR	Lynn Dickson			Yes	
Assistant Director, ODCR		Scott Lanum			Yes		
(A) Deputy Chief, Diversity Management Division, ODCR		Management	Carolyn L. Lea	ry		Yes	
(A) Chief, Diversity Division, ODCR	Manager	nent	Rita Bhanot			Yes	
Deputy Assistant Dir	rector, O	DCR	Robin Kilgore			Yes	

	Planned Activities Toward Completion	on of Objective	_					
Target Date	Planned Activities	Planned ActivitiesSufficientStaffing &Funding?		Completion Date				
12/31/2019	Schedule a meeting with OHC to discuss the status of implementation of exit interviews.	No	12/31/2020	07/16/2020				
09/30/2020	Conduct barrier analysis to identify any potential barriers.	No		09/30/2020				
12/31/2020	Draft a plan of action to resolve barriers identified via barrier analysis.	No						
01/31/2021	Implement plans of action to resolve barriers identified via barrier analysis.	No						
03/30/2021	Schedule a round table with Managers/Supervisors	No						
09/30/2021	Conduct an analysis of available workforce data to identify the series, grade, and occupation of the PWD/ PWTDs separating from service.	No						
	Report of Accomplishme	nts						
Fiscal Year	Accomplish	nment						
2020	OHC initiated the exit interview for voluntary and involunt	ary separations.						
2020	ODCR conducted a review of 191 position descriptions to identify potential barriers for LEO and non-LEO positions. Potential barriers related to the requirement to obtain and maintain a driver's license, strenuous physical activity, vision/hearing requirements and dexterity requirements were identified as potentially impacting separation for PWD and PWTD employees.							
2020	<ul> <li>3. If the planned activities did not correct the trigger(s) and/or barrier(s), please describe how the agency intends to improve the plan for the next fiscal year.</li> <li>During FY 2021 ODCR will continue with the review of position descriptions as part of our barrier analysis program, and transition into a review of applicable policies. Additionally, ODCR is in the process of preparing an analysis of the exit survey with recommendations to be provided to the Office of Human Capital.</li> </ul>							

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

ICE was unable to conduct the final architectural barrier walk-through in Washington, DC due to scheduling issues. ICE anticipates completing this walk-through by March 31, 2020. Architectural barrier walkthroughs were further delayed in Washington DC and Baltimore due to COVID 19. Architectural barrier walkthroughs scheduled for FY 2020 will be rescheduled for FY 2021. Barrier analysis was initiated in FY 2019. However, due to the limited number of RA staff and Contractors available to conduct the analysis, it will continue and be completed in FY 2020.

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

The completion of the Architectural Barrier walkthroughs provided valuable information which will be used to establish the plan for resolving the identified barriers. Barriers identified included issues such as absence of electronic door openers, inaccessible kitchen areas or pantries, inaccessible file cabinets, and inaccessible maps or notices for visually impaired employees. The training provided resulted in a more confident and knowledgeable RA team. As a result of the training provided, the Reasonable Accommodation team is more confident and skilled in responding to inquiries and processing reasonable accommodation requests. Additionally, the training has provided a Reasonable Accommodation Coordinator with the knowledge of how and where to research Reasonable Accommodation (RA) information, which in turn continues to increase knowledge and skill. Coordinating with the Program Manager for the current contract facilitated the assignment of RA projects to available contractors. Additionally, this resulted in the Program Manager having the opportunity to identify the Contractor with the knowledge and skill to complete the task. An additional benefit that occurred during FY 2019, was the opportunity for a Contractor to expand her knowledge and skill in conducting research and completing projects for the RA team. The availability of Applicant Flow Data from USA Staffing provided

ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data. The availability of Applicant Flow Data from USA Staffing provided ICE the ability to review and determine whether the information provided is sufficient for conducting the needed analysis of the ICE workforce, as well as determining next steps to obtain additional data. The meeting with OLCD established the protocols and manner in which data will be provided to ODCR.

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.

ODCR will be preparing the plan for addressing areas identified during the walkthroughs. Barrier analysis will continue in FY 2020 and transition to a review of policies and procedures. Training provided resulted in a more confident and knowledgeable RA team. ODCR will continue to monitor available training via DEOMI during FY 2020. Barrier analysis will continue in FY 2020 in order to identify potential barriers regarding the Attorney/General Attorney series (0905), and Intelligence Research Specialist series (0132). Applicant Flow Data was obtained via the USA Staffing portal which provides information regarding internal competitive promotions. However, although ICE was able to obtain this data, it did not assist us in eliminating the barrier. The information available provides information regarding internal competitive promotions across the workforce and not broken down by grade level. The Disability Program Manager will coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information regarding internal competitive promotions information regarding internal competitive promotions across the workforce and not broken down by grade level. Applicant Flow Data was obtained via the USA Staffing point of contact to determine if a custom report can be developed for ICE that would provide the internal competitive promotions information regarding internal competitive promotions across the workforce and not broken down by grade level. The Disability Program Manager will coordinate with the USA Staffing point of contact to determine if a custom report can be developed for ICE was able to obtain this data, it did not assist us in eliminating the barrier. The information available provides information regarding internal competitive promotions across the workforce and not broken down by grade level. The Disability Program Manager will coordinate with the USA Staffing point of contact to determine if a custom report c