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

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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 C.F.R. § 1614.203(d)(7)) require agencies to establish specific numerical goals for increasing the participation of persons with reportable and targeted disabilities in the federal government.

1. Using the goal of 12% as the benchmark, does your agency have a trigger involving PWD by grade level cluster in the permanent workforce? If “yes”, describe the trigger(s) in the text box.
   a. Cluster GS-1 to GS-10 (PWD)  Answer: Yes
   b. Cluster GS-11 to SES (PWD)  Answer: Yes

   GS-1 to GS-10 cluster is 11.02 percent, which falls below the benchmark. GS-11 to SES cluster is 5.82 percent, which is well below the benchmark.

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

   GS-1 to GS-10 cluster is 1.98 percent, which is slightly below the benchmark. GS-11 to SES cluster is 0.56 percent, which is well below the benchmark.

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

   CBP has identified hiring goals to managers and recruiters in the Agency’s Diversity and Inclusion Strategic Plan FY 2016 - FY 2020. In addition, recruiters regularly participate in meetings in which hiring goals are indentified.

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 DISABILITY PROGRAM**

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

   **Answer:** No

There are two (2) representatives in the Office of Human Resources Management (HRM): a Selective Placement Program Coordinator and a Disability Recruitment Program Coordinator.

There are two (2) Reasonable Accommodation Coordinators in the Privacy and Diversity Office (PDO).

Implementation of the following initiative will not succeed without attention in the following areas:

1. Align the current and future human capital needs to CBP’s strategic (mission) requirements;
2. Determine the number, skills, and proficiency level of required employees and where (PDO, HRM) and when these employees will be required; and
3. Identify actions that must be taken to attract, develop, and retain the number and types of employees that the disability program will require - based on hard to find, hard to fill, hard to keep aspects of geographic location and any special skill requirement associated with the valid workload and associated position.

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

<table>
<thead>
<tr>
<th>Disability Program Task</th>
<th># of FTE Staff by Employment Status</th>
<th>Responsible Official (Name, Title, Office, Email)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Processing applications from PWD and PWTD</td>
<td>0 0 24</td>
<td>HRM, CBP Hiring Center</td>
</tr>
<tr>
<td>Answering questions from the public about hiring authorities that take disability into account</td>
<td>0 0 24</td>
<td>HRM, CBP Hiring Center</td>
</tr>
<tr>
<td>Processing reasonable accommodation requests from applicants and employees</td>
<td>2 0 0</td>
<td>Darlene Sedwick, (A) Director, PDO, Diversity and EEO Division, <a href="mailto:Darlene.M.Sedwick@cbp.dhs.gov">Darlene.M.Sedwick@cbp.dhs.gov</a></td>
</tr>
<tr>
<td>Section 508 Compliance</td>
<td>3 0 0</td>
<td>Brooke Aiken, Section 508 Coordinator, Office of Information and Technology; <a href="mailto:Brooke.C.Aiken@cbp.dhs.gov">Brooke.C.Aiken@cbp.dhs.gov</a></td>
</tr>
<tr>
<td>Disability Program Task</td>
<td># of FTE Staff by Employment Status</td>
<td>Responsible Official (Name, Title, Office, Email)</td>
</tr>
<tr>
<td>-------------------------------------------------------------</td>
<td>------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Architectural Barriers Act Compliance</td>
<td>0 0 1</td>
<td>Fritz Dutch, Director, Facilities Management &amp; Engineering, Office of Facilities and Asset Management, <a href="mailto:francis.dutch@cbp.dhs.gov">francis.dutch@cbp.dhs.gov</a>, <a href="mailto:OFAMtaskings@cbp.dhs.gov">OFAMtaskings@cbp.dhs.gov</a></td>
</tr>
<tr>
<td>Special Emphasis Program for PWD and PWTD</td>
<td>1 0 0</td>
<td>Darlene Sedwick, (A) Director, PDO, Diversity and EEO Division, <a href="mailto:Darlene.M.Sedwick@cbp.dhs.gov">Darlene.M.Sedwick@cbp.dhs.gov</a></td>
</tr>
</tbody>
</table>

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(s) that disability program staff have received. If “no”, describe the training(s) planned for the upcoming year.

Answer: Yes

Two (2) of two Reasonable Accommodation Coordinators in the PDO received Disability Program Manager Training in May 2017. In 2016 and 2017, the Reasonable Accommodation Coordinators also received training in the Accessibility Compliance Management System (ACMS) to record and report requests for reasonable accommodation.

Within HRM, the Selective Placement Program Coordinator (SPPC) and Disability Recruitment Program Manager attended training conducted by the Department of Homeland Security’s (DHS) Disability Program Manager in FY 2017. In addition the SPPC completed OPM’s online SPPC training. Hiring Center staff participated in seven disability education webinars (such as WRP, Deaf and Hard of Hearing Awareness) and two live training courses regarding 508 compliance and service animals in the workplace.

B. PLAN TO ENSURE SUFFICIENT FUNDING FOR THE DISABILITY PROGRAM

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

Answer: No

Pursue and investigate the establishment of a Reasonable Accommodation Central Fund; proactively plan for vacancies and potential shifts in the composition and increasing workload of Disability Program staff; initiate requests for personnel action; in addition to full-time employment opportunities, announce part-time and job sharing opportunities to bolster Disability Program staff; make a request to use hiring flexibilities when a critical hiring need or severe shortage of candidates exists in the disability program.

However, funding is currently provided to participate in various recruitment events.
Section III: Program Deficiencies in the Disability Program

In Part G of its FY 2017 MD-715 report, the agency identified the following program deficiencies involving its disability program:

<table>
<thead>
<tr>
<th>Program Deficiencies</th>
<th>Agency Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are 90% of accommodation requests processed within the frame set forth in the agency</td>
<td></td>
</tr>
<tr>
<td>procedures for reasonable accommodation?</td>
<td></td>
</tr>
</tbody>
</table>

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 APPLICANTS WITH DISABILITIES

1. Describe the programs and resources the agency uses to identify job applicants with disabilities, including individuals with targeted disabilities.

The SPPC is an HR Specialist (Recruitment and Placement) who monitors a central mailbox dedicated to the Agency’s Selective Placement Program. CBP also conducts e-Recruiting and outreach to college campus career services offices throughout the country providing them with both Pathways and selective placement program information. CBP ensures awareness of the Departments of Labor and Defense Workforce Recruitment Program database by sending annual mass emails to its offices’ HR liaisons, reminding them to use the database as a tool to recruit students/graduates with disabilities.

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

CBP appointed 42 Schedule A hires in FY 2017 compared to 29 in FY 2016. Employees hired with a targeted disability increased from five, in FY 2016, to eight in FY 2017. Two-hundred and fifteen applicants were hired as a 30 percent or more compensable disabled veteran.

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

The SPPC reviews the resumes of applicants from the Agency’s SPPC general mailbox and determines if there are positions available that meet the applicants’ skillset. Upon verifying the Schedule A documentation, the SPPC reviews the resumes to determine if the applicants meet the basic qualifications of a standing vacancy and refers the resumes to an office’s servicing HR Specialist for consideration. In FY 2017, over 312 qualified Schedule A applicants were referred to selecting officials. Qualified applicants who apply directly to an announcement are placed on a non-
competitive eligible Schedule A list. HR Specialists are instructed to provide managers with any noncompetitive lists prior to referring competitive eligibles (those who applied under an announcement).

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

Per DHS, CBP established that it would announce the Schedule A training bi-yearly (scheduled for December 2017). CBP also had the OPM Roadmap to Success: Hiring, Retaining and Including People with Disabilities course added in to its training system as a mandatory course for all supervisors and HR staff. During FY 2017, 3.43 percent of the onboard supervisors completed the course.

B. PLAN TO ESTABLISH CONTACTS WITH DISABILITY EMPLOYMENT ORGANIZATIONS

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

In FY 2017, in addition to outreach to colleges, staff contacted vocational rehabilitation agencies throughout the country. This effort established an ongoing relationship with the Arizona offices who regularly provided upcoming event information to CBP which was, in turn, shared with the local special emphasis program managers and recruiters. (CBP is scheduled to participate in a Third Thursday call with the agency in second quarter 2018). In FY 2016, Headquarters personnel established a relationship with the Virginia Department of Rehabilitative Services where the agency participated in a webinar to brief CBP staff on using their agency as a resource for applicants. During FY 2017, CBP was invited to their Virginia office to conduct an information session with over 30 of their clients. CBP also attends Gallaudet University’s (school for the deaf in Washington, DC) annual spring and fall job fairs.

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

   PWTDs accounted for 0.77 percent of new hires, which falls below the benchmark.

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.
   a. New Hires for MCO (PWD) Answer: No
   b. New Hires for MCO (PWTD) Answer: No

   PWDs and PWTDs are selected at similar rates to the qualified applicant pool. However, it should be noted that the majority of CBP’s MCOs have established physical requirements and which results in a qualified applicant pool of PWDs and PWTDs being below the Federal goal benchmarks.

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.
   a. Qualified Applicants for MCO (PWD) Answer: No
   b. Qualified Applicants for MCO (PWTD) Answer: No

   PWDs and PWTDs are selected at similar rates to the relevant applicant pool for internal applicants. However, it should be noted that the majority of CBP’s MCOs have established physical requirements which results in lower participation rates of PWDs and PWTDs in these occupations.

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.
   a. Promotions for MCO (PWD) Answer: No
   b. Promotions for MCO (PWTD) Answer: No

   PWDs and PWTDs are selected at similar rates to the qualified applicant pool for internal applicants. However, it should be noted that the majority of CBP’s MCOs have established physical requirements which results in lower participation rates of PWDs and PWTDs in these occupations.

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.

There is no advancement program plan specifically for PWDs, including PWTDs.

B. CAREER DEVELOPMENT OPPORTUNITIES

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

The CBP Mentoring Program allows all CBP employees to navigate challenging career opportunities and develop well-balanced work and personal lives through mentoring relationships. The program connects experienced personnel with those looking for advice and discussion, and facilitates self-directed learning through the sharing of institutional and personal knowledge. In the two years since the program launched, more than 1,200 mentees have participated, and nearly 2,500 mentors have volunteered their time to give back to CBP and its employees.

2. 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 applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

   a. Applicants (PWD) Answer: No
   b. Selections (PWD) Answer: No

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

3. Do triggers exist for PWTD among the applicants and/or selectees for any of the career development programs identified? (The appropriate benchmarks are the relevant applicant pool for applicants and the applicant pool for selectees.) If "yes", describe the trigger(s) in the text box.

   a. Applicants (PWTD) Answer: No
   b. Selections (PWTD) Answer: No

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

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

PWDs accounted for 5.06 percent of cash awards of $500 and above, which falls below the inclusion rate of 6.37 percent. PWTDs accounted for 0.53 percent of cash awards of $500 and above, which falls below the inclusion rate of 0.69 percent. (Note: nominal triggers include PWTDs accounted for 0.68 percent of time-off awards of 9 hours or more and 0.61 percent of step increases).

2. Using the inclusion rate as the benchmark, does your agency have a trigger involving PWD and/or PWTD for quality step increases or performance-based pay increases? If "yes", please describe the trigger(s) in the text box.
   a. Pay Increases (PWD) Answer: No
   b. Pay Increases (PWTD) Answer: No

Note: There is a nominal trigger for PWTDs and quality step increases. PWTDs accounted for 0.61 percent of step increases, which falls below the inclusion rate of 0.69 percent. There were a total of 164 quality step increases awarded in FY 2017; 1 PTWD received a quality step increase.

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

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

D. PROMOTIONS
1. Does your agency have a trigger involving PWD among the qualified internal applicants and/or selectees for promotions to the senior grade levels? (The appropriate benchmarks are the relevant applicant pool for qualified internal applicants and the qualified applicant pool for selectees.) For non-GS pay plans, please use the approximate senior grade levels. If "yes", describe the trigger(s) in the text box.

a. SES
   i. Qualified Internal Applicants (PWD)  Answer: No
   ii. Internal Selections (PWD)  Answer: No

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

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

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

Note: Applicant flow data does not currently include individuals who are 30 percent or more compensable veterans, while the relevant applicant pool does. The applicant flow data below reflects all certificates that were audited in FY 2017 and may include multiple years.

a. There were no applicants or selections for SES positions in the applicant flow data of certificates audited in fiscal year 2017.

b. PWDs accounted for 2.33 percent of total internal applications received and 1.91 percent qualified applicants for GS-15 positions, which was below the relevant applicant pool of 7.75 percent. However, PWDs accounted for 5.56 percent of selections. There were a total of 18 selections.

c. PWDs accounted for 2.23 percent of total internal applications received and 1.68 percent of qualified applicants for GS-14 positions, which was below the relevant applicant pool of 6.81 percent. However, PWDs accounted for 2.22 percent of selections. There were a total of 45 selections.

d. PWDs accounted for 1.25 percent of total internal applications received and 0.83 percent of qualified applicants for GS-13 positions, which was below the relevant applicant pool of 4.85 percent. However, PWDs accounted for 1.28 percent of selections. There were a total of 78 selections.
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.

a. SES
   i. Qualified Internal Applicants (PWTD) Answer: No
   ii. Internal Selections (PWTD) Answer: No

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

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

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

Note: There were too few selections and qualified applicants with targeted disabilities based on fiscal year 2017 applicant flow data. In addition, applicant flow data does not currently include individuals who are 30 percent or more compensable veterans, while the relevant applicant pool does. The applicant flow data below reflects all certificates that were audited in FY 2017 and may include multiple years.

a. There were no applicants or selections for SES positions in the applicant flow data of certificates audited in fiscal year 2017.

b. PWTDs accounted for 0.33 percent qualified applicants for GS-15 positions, which was below the relevant applicant pool of 0.72 percent. There were a total of 18 selections and no PWTDs were selected. This can be considered a nominal trigger and will be reviewed for further monitoring.

c. PWTDs accounted for 0.21 percent of qualified applicants for GS-14 positions, which was below the relevant applicant pool of 0.65 percent. There were a total of 45 selections and no PWTDs were selected. This can be considered a nominal trigger and will be reviewed for further monitoring.

d. PWTDs accounted for 0.38 percent of qualified applicants for GS-13 positions, which was below the relevant applicant pool of 0.44 percent. There were a total of 78 selections and no PWTDs were selected. This can be considered a nominal trigger and will be reviewed for further monitoring.
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.

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

   N/A.

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.

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

   N/A.

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.

   a. Executives
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No
   b. Managers
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No
   c. Supervisors
      i. Qualified Internal Applicants (PWD) Answer: No
      ii. Internal Selections (PWD) Answer: No

   Data are not currently tracked.
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.
   a. Executives
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   b. Managers
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No
   c. Supervisors
      i. Qualified Internal Applicants (PWTD) Answer: No
      ii. Internal Selections (PWTD) Answer: No

Data are not currently tracked.

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

Data are not currently tracked.

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.
   a. New Hires for Executives (PWTD) Answer: No
   b. New Hires for Managers (PWTD) Answer: No
   c. New Hires for Supervisors (PWTD) Answer: No

Data are not currently tracked.

Section VI: Plan to Improve Retention of Persons with Disabilities

To be a 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 personal 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

   HRM monitors the employment status of Schedule A appointees and to remind supervisors/managers of eligibility of conversion to the competitive service after 2 years.

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

   PWDs accounted for 10.29 percent of voluntary separations and 11.11 percent of involuntary separations (10.34 percent overall); this exceeds the PWD inclusion rate of 6.37 percent. Furthermore, PWDs separated at a rate of 5.35 percent while persons without disabilities separated at 3.14 percent.

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

   PWTDs accounted for 1.38 percent of voluntary separations and 2.38 percent of involuntary separations (1.44 percent overall); this exceeds the PWTD inclusion rate of 0.70 percent. Furthermore, PWTDs separated at a rate of 6.81 percent while persons without targeted disabilities separated at 3.27 percent.

4. If a trigger exists involving the separation rate of PWD and/or PWTD, please explain why they left the agency using exit interview results and other data sources.

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

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

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

https://www.cbp.gov/site-policy-notices/accessibility

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

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

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

1. Requirements - All CBP space is adequately accessible where applicable. Accessibility requirements for some spaces may be waived based on access limited to able-bodied CBP officers. In general, Accessibility shall be provided, except where the requirements are in conflict with the security or mission-critical functions of CBP-controlled spaces.

2. Policies and Practices – The following are areas that CBP is currently engaged in the active enforcement of the Architectural Barriers Act (ABA):
   b. Statement of Work (SOW) – Current SOW’s contain accessibility requirements for all new construction and renovation projects.
   c. Facility Condition Assessments – Reports ADA deficiencies or if additional studies are required
   d. GSA Support – GSA requires all designs and renovations to comply with ABA standards.
   e. Team Members – CBP has employed Architects with skill sets to support and review compliance of ABA standards on our projects

Border Patrol Air and Marine Program Management Office (PMO):

- BPAM PMO cites within the U.S. Border Patrol Design Standards and the AMO Design Standards the ABA and requires compliance with ABA as appropriate considering exceptions cited in the ABA section 203.
- BPAM PMO includes requirements for compliance with the ABA in SOW for operational services, maintenance contracts and construction contracts.
- BPAM PMO executes the FCA program for FM&E and requires assessment and reporting of ABA compliance as deficiencies for each facility. ABA non-compliance is reported as an opportunity for corrective action within the TRIRIGA facility
management system, and acted on as part of the funding allocation for repair projects.

- BPAM PMO conducts annual portfolio investment projects addressing facility sustainment and operational requirements where facilities are upgraded to improve accessibility when the projects impact any aspect of accessibility. The list of improvement projects is extensive. BPAM PMO registered architects review each project executed by the PMO for code and ABA compliance. Approval of each project is required by the position description of the Chief Architect.

BPAM PMO provides immediate response and corrective action for requests or complaints received. This has been demonstrated by action at Ysleta BPS.

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.)

41.7 business days (101 requests by current employees that resulted in yes or no decision with 4,211 total processing 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.

Applicant accommodation requests are processed within approximately one (1) business day. There were increasing efforts to provide CBP Reasonable Accommodation Interactive Process for Supervisors and Managers Training via both in-person and webinar capabilities during FY 2017.

D. PERSONAL ASSISTANCE SERVICES ALLOWING EMPLOYEES TO PARTICIPATE IN THE WORKPLACE

Pursuant to 29 C.F.R. § 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, timely providing approved services, conducting training for managers and supervisors, and monitoring PAS requests for trends.

The development of an Action Plan is required to implement the Final Rule for the PAS requirement on January 3, 2018.

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 government-wide average?  
Answer: No

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

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

There were no findings of discrimination based on disability status during FY 2017. A settlement agreement was entered for a complaint originating from FY 2013 to provide the Complainant priority consideration in re-assignment.

B. EEO COMPLAINT DATA INVOLVING REASONABLE ACCOMMODATION

1. During the last fiscal year, did a higher percentage of PWD file a formal EEO complaint alleging failure to provide a reasonable accommodation, as compared to the government-wide average?  
Answer: No

2. During the last fiscal year, did any complaints alleging failure to provide reasonable accommodation result in a finding of discrimination or a settlement agreement?  
Answer: No

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

Not applicable.

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.
<table>
<thead>
<tr>
<th>Trigger 1</th>
<th>Reasonable Accommodations are not being processed within identified time frames.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barrier(s)</td>
<td>To issue written determinations in a timely manner.</td>
</tr>
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</table>

<table>
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<tr>
<th>Responsible Official(s)</th>
<th>Performance Standards Address the Plan? (Yes or No)</th>
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<tr>
<td>Darlene Sedwick</td>
<td>Yes</td>
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<tr>
<th>Barrier Analysis Process Completed? (Yes or No)</th>
<th>Barrier(s) Identified? (Yes or No)</th>
</tr>
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<tbody>
<tr>
<td>Yes</td>
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<tr>
<td>Workforce Data Tables</td>
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<th>Target Date (mm/dd/yyyy)</th>
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<th>Modified Date (mm/dd/yyyy)</th>
<th>Completion Date (mm/dd/yyyy)</th>
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<tbody>
<tr>
<td>06/30/2018</td>
<td>Update agency policies and MOUs, and responsible roles. May include potential negotiations with unions (i.e. Adopt simplified forms to replace template letters and automate processing for Decision maker)</td>
<td>Yes</td>
<td></td>
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<tr>
<td>06/30/2019</td>
<td>Provide training to managers and supervisors.</td>
<td>Yes</td>
<td></td>
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<tr>
<td>03/30/2018</td>
<td>Conduct internal systematic review of policy, procedures and practices for bottlenecks (i.e. establish specific time frames for review).</td>
<td>Yes</td>
<td></td>
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<tr>
<td>09/30/2018</td>
<td>Submit for program office review and concurrence.</td>
<td>Yes</td>
<td></td>
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<tr>
<td>12/31/2018</td>
<td>Develop Communication Plan.</td>
<td>Yes</td>
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</tr>
<tr>
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<td>Accomplishments</td>
<td></td>
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**Trigger 2**
PWD and PWTD new hires in the permanent workforce are below the benchmark goals of 12 percent and 2 percent, respectively.

**Barrier(s)**
There are established physical requirements for CBP’s uniformed positions which comprise 81 percent of CBP’s total workforce. Each occupation has established physical requirements as mandated by the Department of Homeland Security (DHS). There will be no changes to the established requirements, as they are consistent with business needs.

**Objective(s)**
There are established physical requirements for CBP’s uniformed positions which comprise 81 percent of CBP’s total workforce. Each occupation has established physical requirements as mandated by the Department of Homeland Security (DHS). There will be no changes to the established requirements, as they are consistent with business needs.

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**Barrier Analysis Process Completed? (Yes or No)**

**Barrier(s) Identified? (Yes or No)**

**Yes**

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<tr>
<td>09/30/2018</td>
<td>Develop and implement a Diversity Outreach Plan to establish (or renew) partnerships with institutions of higher learning that have predominantly, or maintain high, PWD enrollment and community or advocacy groups that serve communities with high populations of PWDs.</td>
<td>Yes</td>
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4. Please explain the factor(s) that prevented the agency from timely completing any of the planned activities.

Not applicable; implementation began in FY 2018.

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

Not applicable; implementation began in FY 2018.

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.

Not applicable; implementation began in FY 2018.