



# **U.S. Department of Homeland Security**

**Office of the Citizenship and Immigration Services  
Ombudsman (CISOMB)**

**Plan for Improving Access to CISOMB Public Engagement  
Programs and Activities for Individuals with Disabilities**

August 2019

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## Statement of Commitment

The Office of Citizenship and Immigration Services Ombudsman (CISOMB) is committed to ensuring equal access and participation for people with disabilities. CISOMB is committed to treating people with disabilities with respect and in a manner that allows them to maintain their dignity and independence. CISOMB strongly believes in inclusion, and thus, will operate in a manner that seeks to identify and remove barriers, and meet the requirements of the DHS Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*.

### I. Introduction

The Office of Citizenship and Immigration Services Ombudsman (CISOMB) developed this plan in order to comply with the requirements of DHS Directive 065-01, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*, and the requirements of Section 504 of the Rehabilitation Act of 1973. The DHS Directive requires each component to:

- a) Designate a lead Disability Access Coordinator and key responsible staff who will address the barriers to enforce the requirements of the Directive,
- b) Conduct a Self-Evaluation of its programs and activities to identify barriers and gaps in ensuring access for individuals with disabilities, and
- c) Develop a Component Plan to address the results of the Self-Evaluation.

CISOMB has appointed a Management and Program Analyst as its Disability Access Coordinator (DAC) to conduct the Self-Evaluation, and to take appropriate actions based on the DHS Office for Civil Rights and Civil Liberties (CRCL)'s feedback and comments to address the barriers and gaps.

### II. Executive Summary

CISOMB conducted its Self-Evaluation based on the DHS Directive and instruction 065-01-001, *Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment)*, between August 2018 and September 2018. CISOMB used the Self-Evaluation Tool contained within the Component Self-Evaluation and Planning Reference Guide as a platform to interact with key staff members to answer all questions in order to cover all the gaps and comply with the requirements of the Directive. The outcome of the discussions yielded a strong understanding of the requirement and commitment among staff members to provide access to individuals with disabilities in CISOMB's public engagement activities and programs. Also, the Self-Evaluation articulated the need for a specific policy to reiterate CISOMB's commitment to providing access to individuals with disabilities and to ensure nondiscrimination for individuals with disabilities served by CISOMB conducted programs and activities.

The creation of the CISOMB Disability Access Policy for Conducted Programs and Activities will address several specific issues that were identified during the Self-Evaluation. These issues include, among other things, enhancing communication among the workforce and stakeholders concerning CISOMB's commitment to ensuring that individuals with disabilities are treated in a nondiscriminatory manner. The Disability Access Policy for Conducted Programs and Activities will also provide further guidance concerning providing reasonable accommodations, to include associated steps and timelines, to address the accessibility needs of employees and members of the public who have disabilities. Accordingly, qualified sign language interpreters and other auxiliary aids and services will be provided in order to facilitate effective communication between CISOMB and the public.

In regard to the physical access to CISOMB office space, the DAC will engage in a discussion with the appropriate entities, including personnel from the Office of the Chief Readiness Support Officer (CRSO), the General Services Administration (GSA), and property management company, as appropriate, to evaluate current compliance with applicable accessibility standards and ensure physical accessibility for individuals with disabilities.

During significant stakeholder engagements, such as its Annual Conference, CISOMB personnel routinely engage with appropriate entities, to include the venue provider, to coordinate access issues for those with disabilities. In addition, CISOMB arranges for interpretation services, as appropriate, for its significant engagements.

To date, CISOMB has not received any complaints based upon a failure to provide reasonable accommodations, or similar services, to any members of the public.

### **III. Component Plan to address Barriers and Gaps**

#### **A. Responsible Staff**

*CISOMB Disability Access Coordinator (DAC):* The CISOMB Management and Program Analyst works with key staff members, to include the Deputy Ombudsman, Director of Operations, Chief of Casework, Chief of Policy, and the Community Outreach Specialist to ensure CISOMB remains compliant with applicable guidance. The CISOMB DAC also coordinates and consults with the Office for Civil Rights and Civil Liberties (CRCL), as well as other headquarters components on best practices that have been developed around the Department to support implementation of DHS Directive 065-01.

Specifically, the DAC will consult and coordinate with the CRCL's Equal Employment Opportunity Office (EEO) as needed in order to assist in obtaining reasonable accommodations for meetings. Additionally, the DAC will meet with the Office of Accessible Systems and Technology (OAST) to ensure that electronic communications with members of the public are accessible to individuals with disabilities.

*CISOMB Supporting Disability Access Coordinator:* CISOMB's Program Specialist, or another appropriate Operations Team member, fulfills the responsibilities of the DAC in the absence of the DAC.

#### **B. Office of Citizenship and Immigration Services Ombudsman Overview**

The Office of the Citizenship and Immigration Services Ombudsman (CISOMB) is dedicated to improving the quality of citizenship and immigration services delivered to the public by providing individual case assistance, as well as making recommendations to improve the administration of immigration benefits by U.S. Citizenship and Immigration Services (USCIS). Created by section 452 of the Homeland Security Act of 2002, CISOMB is an impartial and confidential resource that is independent of USCIS.

CISOMB supports, assists, and provides information and assistance to individuals experiencing delays or problems in the processing of their applications for family, humanitarian, and employment immigration benefits. CISOMB communicates with individual applicants, petitioners, and employers to determine the nature of the difficulties encountered. CISOMB conducts research to determine possible courses of action, and engages with USCIS in order to obtain information that will assist in moving application/petition toward final adjudication, or resolving practical problems connected with changes of address, non-delivery of USCIS-generated correspondence, etc.

Detailed information about CISOMB is available at: <https://www.dhs.gov/topic/cis-ombudsman>.

### **C. Program Interactions**

Upon the initiation of the Self-Evaluation, CISOMB DAC requested from applicable supervisors a list of public engagement activities for which they are responsible. These activities include:

- Ombudsman Case Assistance Form, DHS-7001.
- Ombudsman Customer Satisfaction Survey form, DHS-7002.
- Communication with the public through stakeholder meetings, in person, by phone, and email.
- Public teleconferences and webinars (virtual events).
- Annual Report.
- Annual Conference.
- Outreach materials.
- National Public Engagement Sessions.

### **D. Addressing Existing Policy Gaps and Barriers**

DHS Directive 065-01 established a policy that affirms the Department's commitment to the nondiscrimination obligations of Section 504, which applies to all CISOMB-conducted programs and activities:

- 1- It is the policy of CISOMB to ensure nondiscrimination based on disability in its conducted programs and activities, and for CISOMB to provide equal opportunity for qualified individuals with disabilities served or encountered in its conducted programs and activities, through:

- a. Program accessibility, including by providing equal opportunity to access programs, services, and activities, as well as delivering these in the most integrated setting appropriate to the individual's needs;
  - b. Physical access, including by providing accessible new construction and alterations in accordance with the Architectural Barriers Act of 1968 (as amended) and the Department's Section 504 regulation; and
  - c. Effective communication, including by providing auxiliary aids and services for persons who are deaf or hard of hearing or are blind or have low vision, and by modifying practices and materials to ensure effective communication with persons with intellectual or developmental disabilities, unless this requirements will impose an undue burden on CISOMB.
- 2- It is the policy of CISOMB to provide any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service, or activity, or result in undue financial and administrative burdens to CISOMB. It is the policy of CISOMB to engage in an interactive and individualized process to identify reasonable accommodations and modifications. In ensuring effective communication with individuals with disabilities, it is the policy of CISOMB to give primary consideration to the auxiliary aid requested by the individual with the disability.

For more information about the nondiscrimination obligations of Section 504 and about DHS Directive 065-01, please visit <https://www.dhs.gov/disability-access-department-homeland-security#content>.

### **E. Program Accessibility**

Listed below are CISOMB's methods, including removal of structural barriers, to improve access to programs and activities for individuals with disabilities in the most integrated setting appropriate.

- Improvement in verifying the accessibility of off-site meeting venues where CISOMB staff are speaking or co-hosting meetings;
- Coordinating with building management officials concerning the expanded use of braille, as required, in elevators where CISOMB maintains leased office space so that all elevator buttons, not just some, have this feature; and
- Coordinating with building management officials concerning improvements in accessibility to the building in which CISOMB offices are leased, such as a wheelchair accessible ramps and automatic door openers.

### **F. Interaction Procedures and Protocols.**

Listed below is CISOMB's process for modifying existing or developing new procedures or protocols to improve access for individuals with disabilities encountered or served by CISOMB:

- Development of new guidance – CISOMB will develop a comprehensive Disability Access Policy for Conducted Programs and Activities which will describe protocols for ensuring equal access for interacting with persons with disabilities; and
- Conduct periodic training of all CISOMB staff in the area of compliance with Section 504 in CISOMB conducted activities.

### **G. Reasonable Accommodation Policies and procedures**

Listed below is CISOMB’s plan for modifying existing or developing new policies and procedures for providing reasonable accommodations and modifications to qualified individuals with disabilities.

- Development of a CISOMB Disability Access Policy for Conducted Programs and Activities, which will outline the steps to take upon receipt of requests for reasonable accommodations from individuals with disabilities. This new policy will include:
  - An introduction and overview of CISOMB’s obligation under the Rehabilitation Act to ensure equal access to public-facing programs and activities for individuals with disabilities;
  - Information on the interactive process and how it relates to the provision of reasonable accommodations;
  - A description of the process to be followed when a request for a reasonable accommodation is received;
  - Identification of key staff who will assist in obtaining a reasonable accommodation; and
  - A method of tracking all requests for reasonable accommodations received and how each request was handled.

### **H. Auxiliary Aids and Services policies and Procedures**

Listed below is CISOMB’s plan for modifying existing or developing new policies and procedures to furnish auxiliary aids and services to ensure effective communication for qualified individuals with disabilities.

- Development of new guidance, *CISOMB Guidance for Conducting Accessible Meetings*. This guidance:
  - Lists and describes various types of auxiliary aids and services;
  - Contains specific steps to obtain each of these aids and services; and
  - Lists points of contact within the office who may be of assistance in obtaining these aids and services.

### **I. Dissemination of Policies and Procedures**

Listed below is CISOMB’s plan to make resources related to Directive 065-01 more readily available to CISOMB personnel who interact with or provide information to the public in conducted programs and activities:

- Upon completion and approval of the CISOMB Disability Access Policy for Conducted Programs and Activities and all related guidance that CISOMB develops subsequent to the CISOMB Self-Evaluation, CISOMB will disseminate these materials to CISOMB staff electronically. Examples of materials are:
  - Directive 065-01;
  - CISOMB Disability Access Policy for Conducted Programs and Activities
  - CISOMB’s Plan for Improving Access to Conducted Programs and Activities for Individuals with Disabilities;
  - The *CISOMB Guidance for Conducting Accessible Meetings*;
  - CISOMB procedures for processing complaints from individuals alleging discrimination on the basis of disability, consistent with the DHS Section 504 regulation (6 C.F.R. Part 15);
  - CRCL’s *Guide For Interacting With People Who Have Disabilities*; and
  - The link to the DHS Disability Access web site hosted by CRCL.
  
- CISOMB will provide training to CISOMB staff as noted in the section below.

## **J. Training**

CISOMB will take the following steps to provide training to managerial and program staff on disability access responsibilities:

- The CISOMB DAC, with assistance from supporting personnel as needed, will provide training to CISOMB staff using the methods described below:
  - For all new staff, including detailees, contractors, and interns, CISOMB will provide training and/or orientation on CISOMB’s obligations related to program, physical, and communication access under Section 504. This will include training and/or orientation on the CISOMB Disability Access Policy for Conducted Programs and Activities, the *CISOMB Guidance on Accessible Meetings*; and CRCL’s *Guide to Interacting with People Who Have Disabilities*.
  - CISOMB will post the Disability Access Policy for Conducted Programs and Activities to the CISOMB virtual office, and post appropriate summary materials for the internal and public-facing web pages.

CISOMB will provide training to staff on a recurring basis, and distribute tools and job aids. This training will also include training on the use of auxiliary aids and services.

## **K. Notification to the Public**

CISOMB will take the following steps to provide and/or improve how it provides notice to members of the public of their rights under Section 504 and how to file a complete complaint under Section 504:

- Develop a “Know Your Disability Rights” fact sheet that will be posted to the CISOMB website so that individuals with disabilities who interact with CISOMB will have

knowledge of what they can expect from CISOMB in order to have a successful interaction, and how to file a Section 504 complaint. CISOMB will also make the fact sheet available in hard copy, and in alternative formats, with other CISOMB informational brochures in the CISOMB Front Desk area, and in CISOMB engagements, conferences, and other meetings with the public.

- Post on the CISOMB website and make available in hard copy, and in alternative formats, appropriate summary materials related to the CISOMB Disability Access Policy for Conducted Programs and Activities.

## **L. Resources**

CISOMB is committed to providing the resources necessary to ensure compliance with Section 504 and implementation of this Plan with respect to those individuals with disabilities CISOMB encounters and serves. CISOMB has resources in place to provide reasonable accommodations and auxiliary aids and services as requested by members of the public who have disabilities. As noted above, it is the policy of CISOMB to provide any necessary modifications to afford a qualified individual with a disability full enjoyment of the program or activity, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service or activity, or result in undue financial and administrative burdens to CISOMB.

## **M. Implementation Steps**

### **1. Immediate actions to address policy gaps and barriers following CISOMB's Self Evaluation**

To address the results of its Self-Evaluation, CISOMB has taken several immediate actions to improve access to CISOMB programs and activities while also beginning work on its Component Plan. These actions include, but are not limited to:

- Began planning for the drafting of the *CISOMB Guidance to Conducting Accessible Meetings*. The guidance will provide instructions and tips for staff on ensuring that all meetings and events conducted by CISOMB are accessible to members of the public with disabilities.
- Initiated planning for training of CISOMB staff on conducting accessible meetings.
- Initiated the process of drafting a CISOMB Disability Access Policy for Conducted Programs and Activities.
- Initiated a planning process for developing a standardized “tag line” for requesting reasonable accommodations to be used across CISOMB when issuing invitations to meetings and events that include members of the public.

### **2. Timeframes, milestones, and responsible parties associated with the steps CISOMB will take in implementing the remaining action items described in this Plan.**

#### **a. Policy Barriers (Section D above)**

- Develop a CISOMB Disability Access Policy for Conducted Programs and Activities.
  - Responsible staff: CISOMB DAC in consultation with CRCL
  - Timeline: Policy to be completed by **April 01, 2020**
- Develop *CISOMB Guidance for Conducting Accessible Meetings*.
  - Responsible Staff: CISOMB DAC, with input from CISOMB staff and CRCL staff
  - Status: to be completed by **April 01, 2020**
- Modify or develop training modules on CISOMB’s obligations to ensure accessibility for members of the public with disabilities to be delivered to newly hired staff, including contractors and interns.
  - Responsible staff: CISOMB DAC, with input from CISOMB staff
  - Timeline: **September 30, 2019.**

**b. Program Accessibility** (Section E above)

- Develop improved emergency drill information for all visitors to CISOMB, including those with disabilities.
  - Responsible staff: CISOMB DAC, in collaboration with CRCL staff
  - Timeline: **December 31, 2019.**
- Work to have all elevator buttons labeled with braille.
  - Responsible staff: CISOMB DAC in consultation with CRCL staff
  - Timeline: Discussion with building management to occur by **September 30, 2019.**

**c. Dissemination of Policies and Procedures** (Section I above)

- Upon completion of the development of key documents noted in the Plan and upon approval, the CISOMB DAC will provide the following policies, procedures, and guidance to staff electronically and in hard copy, as needed:
  - *CISOMB Guidance for Conducting Accessible Meetings*. CISOMB will draft the Guidance to senior staff by the end of September 2019 and send it to CRCL for review. Training sessions will begin upon the approval of the Guidance. Targeted completion date for training of all CISOMB staff is **September 30, 2020**
  - CISOMB’s Plan for Improving Access to Conducted Programs and Activities for Individuals with Disabilities. **Completed**
  - The CISOMB Disability Access Policy for Conducted Programs and Activities: Targeted completion date: **September 30, 2020**

**d. Training** (Section J above)

- The CISOMB DAC will conduct training on conducting accessible meetings for current staff of all CISOMB sections
  - Responsible staff: CISOMB DAC
  - Timeline: Training to be completed by **September 30, 2019**
  
- Training of all CISOMB staff on the CISOMB Disability Access Policy for Conducted Programs and Activities will occur following senior leadership approval.
  - Responsible staff: CISOMB DAC
  - Timeline: Training to be completed by **September 30, 2020**
  
- Discussion between CISOMB DAC and responsible CISOMB Contracting Officer (CO), and Contracting Officer Representative (COR) to discuss language in contracts regarding Section 504 obligations as well as training of contract personnel.
  - Responsible staff: CISOMB DAC, CISOMB CO and COR.
  - Timeline: Discussion to occur by end of **December 31, 2019**
  
- e. Notification to the Public** (Section K above)
  
- Develop a “Know Your Disability Rights” Fact Sheet.
  - Responsible staff: CISOMB DAC
  - Timeline: Fact Sheet to be completed by **December 31, 2019**