



**U.S. Citizenship
and Immigration
Services**

Access and Accommodations for Individuals with Disabilities

Plan for Improving Access to USCIS Public-Facing Programs and Activities

**October 2018
Office of Equal Opportunity and Inclusion**

Introduction

[Section 504 of the Rehabilitation Act of 1973](#), as amended, requires that federal agencies provide individuals with disabilities equal access to:

- Programs and activities
- Communications/information
- Buildings and facilities
- Reasonable accommodations/modifications

In 2013, the Department of Homeland Security (DHS) issued [Directive 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities \(Non-Employment\)](#), followed by implementing [Instruction 065-01-001](#). Among other things, the directive and instruction require each component to conduct a self-evaluation to identify gaps in and barriers to accessibility for individuals with disabilities. This plan for improving access outlines U.S. Citizenship and Immigration Services' (USCIS') commitment to addressing the identified gaps and barriers. The self-evaluation report findings are based on information from both external and internal stakeholders, a review of formal and informal complaints filed against USCIS for failure to provide reasonable accommodations for individuals with disabilities, and accessibility testing on a variety of electronic and information technology in compliance with Section 508 standards.

[Section 508 of the Rehabilitation Act of 1973](#) requires that when federal agencies develop, procure, maintain, or use electronic and information technology, individuals with disabilities have access to and use of information and data that is comparable to the access and use by others who do not have disabilities, unless an undue burden would be imposed on the agency.

Executive Summary

The results of the self-evaluation reflect a strong commitment by individual employees to ensuring full access for members of the public with disabilities. Despite this commitment, USCIS identified gaps and barriers, many of them systemic or procedural in nature. Most gaps and barriers fall into one of several categories:

- Lack of a consistently effective accommodations request process;
- The need to provide employees with updated information and resources related to accommodating the public;
- A variety of issues related to sign language interpreters;
- Lack of availability of materials in braille and other alternative formats for individuals who are blind or have low vision; and
- The need to strengthen processes to ensure 508 compliance.

A complete description of actions USCIS will take to remedy the identified gaps and barriers are in the section below entitled USCIS Plan to Improve Access.

USCIS Overview

USCIS administers the nation's lawful immigration system, safeguarding its integrity and promise by efficiently and fairly adjudicating requests for immigration benefits while protecting Americans, securing the homeland, and honoring DHS values. USCIS has approximately 19,000 government employees and contractors working at more than 200 offices across the world.

On March 1, 2003, USCIS officially assumed responsibility for the immigration service functions of the federal government. The Homeland Security Act of 2002 (Pub. L. No. 107-296, 116 Stat. 2135) dismantled the former Immigration and Naturalization Service (INS) and separated the former agency into three components within DHS.

USCIS was formed to enhance the security and improve the efficiency of national immigration services by exclusively focusing on the administration of benefit applications. U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP), components within DHS, handle immigration enforcement and border security functions.

Some of the services USCIS provides include:

- **Citizenship**
Individuals who wish to become U.S. citizens through naturalization submit their applications to USCIS. USCIS determines eligibility, processes the applications and, if approved, schedules the applicant for a ceremony to take the Oath of Allegiance. USCIS also determines eligibility and provides documentation of U.S. citizenship for people who acquired or derived U.S. citizenship through their parents.
- **Immigration of Family Members**
USCIS adjudicates immigration benefit requests of lawful permanent residents and U.S. citizens who seek to bring close relatives to live and work in the United States.
- **Working in the United States**
USCIS manages the process that allows individuals from other countries to work in the United States. Some of the opportunities are temporary, and some provide a path to permanent residence.
- **Verifying an Individual's Legal Right to Work in the United States (E-Verify)**
USCIS manages the system that allows participating employers to electronically verify the employment eligibility of their newly hired employees.
- **Humanitarian Programs**
USCIS administers humanitarian programs that provide protection to individuals inside and outside the United States. Individuals residing outside the United States are not covered by Section 504.
- **Adoptions**
USCIS manages the first step in the process for U.S. citizens to adopt children from other countries. Approximately 20,000 adoptions take place each year.

- **Civic Assimilation**

USCIS promotes instruction and training on citizenship rights and responsibilities and provides immigrants with the information and tools necessary to successfully assimilate into American civic culture.

- **Genealogy**

The USCIS Genealogy Program is a fee-for-service program that provides researchers with timely access to historical immigration and naturalization records of deceased immigrants.

Interaction with applicants is frequent and often occurs in person, by phone to the USCIS Contact Center, through USCIS websites, and by print and electronic correspondence. Please refer to Appendix A for a summary of all the ways in which USCIS employees interface with the public.

USCIS Plan to Improve Access

Access to Programs and Activities

1. Non-discrimination Statements/Policies

Directive 065-01 states:

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

- Program accessibility, including by providing equal opportunity to access programs, services, and activities and delivering these in the most integrated setting appropriate to the individual’s needs;
- 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
- 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.”

Additionally, USCIS has non-discrimination statements in its [USCIS Policy Manual](#) (Policy Manual), the Consolidated Handbook of Adjudication Procedures (CHAP), and the Affirmative Asylum Procedures Manual (AAPM).

- a. To strengthen existing non-discrimination policies, the USCIS director will annually distribute the following to USCIS employees:

- Directive 065-01, Nondiscrimination for Individuals with Disabilities in DHS-Conducted Programs and Activities (Non-Employment);
- USCIS plan developed in accordance with Directive 065-01;
- USCIS procedures for interacting with members of the public who have disabilities, and associated [procedures for processing requests for accommodations](#) from these individuals;
- [USCIS procedures for processing complaints](#) from individuals alleging discrimination on the basis of disability, consistent with the DHS Section 504 regulation (6 CFR Part 15);
- The link to the DHS publication, "[A Guide to Interacting with People Who Have Disabilities](#)," to be printed for use as appropriate; and
- The link to the [DHS disability access website](#) hosted by DHS Civil Rights and Civil Liberties.

Timeline: November 2019

Responsible staff: Office of Equal Opportunity and Inclusion (OEOI)/Disability Access Coordinator

2. Contractor Obligations

Anti-discrimination obligations apply to USCIS contract staff just as they apply to USCIS federal employees. USCIS will take the following actions to ensure contractors fulfill their obligations under sections 504 and 508:

- a. USCIS has a contract with a vendor to locate and lease most of its Application Support Center (ASC) facilities (where applicants' biometrics/fingerprints are captured). Regarding this contract, USCIS will review the contract to determine whether to add requirements related to physical, programmatic, and communication accessibility for individuals with disabilities who enter those facilities.

Timeline: Completed June 2018

Responsible staff: OEOI/Disability Access Coordinator, Immigration Records and Identity Services Directorate (IRIS)/Biometrics, Management Directorate (Management)/Contracting

- b. Consider adding trusted tester requirements to content development solicitations, in addition to existing requirements for software and Agile Web development solicitations.

Timeline: Completed June 2018

Responsible staff: OEOI/Disability Access Coordinator, Management/Contracting and Office of Information Technology (OIT)

- c. Develop and implement a written policy requiring that the appropriate language from the DHS Accessibility Requirements Tool (DART) or its successor is incorporated into all solicitations for Information and Communication Technology (ICT) products/services in excess of the Component Acquisition Review Board (CARB) threshold. Additionally, require that the Section 508 Coordinator review the final draft of all solicitations to ensure they sufficiently communicate the 508 requirements for the product/service.

Timeline: Completed June 2018

Responsible staff: Management/Contracting and OIT

- d. Provide ASC contract staff with the disability terminology chart and the DHS Guide to Interacting with People Who Have Disabilities

Timeline: Completed December 2018

Responsible staff: OEOI/Disability Access Coordinator, IRIS/Biometrics

3. Form N-648, Medical Certification for Disability Exceptions

Naturalization applicants can request to waive the naturalization test or portions of it based on a medical disability or condition that: impacts their ability to learn; has lasted or is expected to last 12 months or more; and is documented by a medical professional on [Form N-648, Medical Certification for Disability Exceptions](#). If the applicant's request for an exception is denied along with [Form N-400, Application for Naturalization](#), the applicant can file Form [N-336, Request for Hearing on a Decision in Naturalization Proceedings](#), which is a hearing on the denial of Form N-400.

USCIS will take the following steps related to Form N-648:

- a. Conduct a Form N-648 informational outreach session to review the fields on the form and the accompanying instructions, and to answer any questions.

Timeline: Completed February 2019

Responsible staff: EXA/Office of Public Affairs and CAIS, FOD

- b. Conduct refresher training for officers on Form N-648.

Timeline: Completed April 2019

Responsible staff: FOD

Access to Communications

1. Access to Virtual Public Engagements

- a. Develop and disseminate guidance for offices on how to secure and use captioning services when members of the public are invited to webinars/teleconferences.

Timeline: Completed July 2018

Responsible staff: EXA, Management/Office of Human Capital and Training (HCT) and OIT

2. Access to Public-Facing Phone Numbers

- a. Add Federal Relay Text Telephone (TTY) as an option for the remaining USCIS public-facing phone numbers that do not currently offer it. Although TTY technology is infrequently used, USCIS is committed to ensuring access for all people with disabilities.

Timeline: Completed December 2018

Responsible staff: OEI/Disability Access Coordinator, FOD/National Benefits Center.

3. Access to Tablets

- a. Assess options for enhanced flexibility with the height and angles at which tablets are utilized by applicants during appointments to accommodate individuals with dexterity impairments and other disabilities.

Timeline: Completed April 2019

Responsible staff: FOD and Management/OIT

4. Public Access to Digital Information in Waiting Rooms

- a. For offices where waiting rooms have digital information displayed on a screen with no accompanying audio, create and disseminate instructions for internal use on how to offer access to the information to individuals who are blind or have low vision.

Timeline: November 2019

Responsible staff: OEI/Disability Access Coordinator and CAIS/Multimedia; FOD; Refugee, Asylum and International Operations Directorate (RAIO)/Asylum; IRIS/Biometrics

5. 508 Compliance: Access to Electronic and Information Technology

- a. For programs that manage a USCIS website, develop and disseminate written Standard Operating Procedures (SOPs) that state who is accountable for authoring, testing and ultimately posting 508-compliant content on both internal and public websites.

Timeline: Completed September 2019

Responsible staff: EXA/CAIS and OEIO/Disability Access Coordinator, IRIS/Verification

- b. For programs that manage a USCIS website, develop written SOPs for internal programmatic use, which state whose responsibility it is for reviewing and testing content for 508 compliance before it is posted and what tools will be used for the testing process.

Timeline: Completed August 2019

Responsible staff: EXA, IRIS/Verification

- c. Develop a process for ensuring that accessibility requirements are incorporated into solicitations to procure items such as InfoPass kiosks, service satisfaction kiosks, etc.

Timeline: Completed June 2018

Responsible staff: OEIO/Disability Access Coordinator, Management/Contracting and OIT

- d. Identify and implement a process to ensure that all immigration forms comply fully with 508 and DHS standards.

Timeline: January 2020

Responsible staff: Management/Office of Intake and Document Production (OIDP) and OIT

- e. Review with contract graphic artists the terms of their contract including the need for all of their products to be compliant with 508 and DHS standards.

Timeline: Completed December 2018

Responsible staff: EXA/CAIS

- f. Develop and implement a campaign to raise awareness about 508 requirements for the general employee population, to include offering training webinars on how to make Word documents and emails 508 compliant.

Timeline: January 2020

Responsible staff: OEIO/Disability Access Coordinator, IRIS/Verification, Management/OIT

- g. Enhance the 508 resources for employees available on internal sites and develop and implement a communications plan to advertise the availability of the resources.

Timeline: January 2020

Responsible staff: EXA/CAIS, OEIO/Disability Access Coordinator, Management/OIT

- h. Ensure that all Drupal (platform for web content management) users have access to and have completed mandatory 508 training. Develop a process to track their completion and ensure that, moving forward, Drupal users are not permitted to post content until they complete the training.

Timeline: August 2020

Responsible staff: EXA/CAIS, Management/OIT (all program offices/directorates with Drupal authors)

- i. Develop and advertise guidance for offices on the 508 requirements for posting audio, visual, and multimedia content on internal and external sites.

Timeline: Completed June 2018

Responsible staff: OEIO/Disability Access Coordinator

6. Access to Sign Language Interpreters and Other Auxiliary Aids for Individuals Who Are Deaf or Hard of Hearing

Sometimes individuals who are deaf cannot access information being relayed to them unless they are provided with a specific type of communication accommodation called an auxiliary aid. USCIS will take the following steps to strengthen its ability to provide qualified and timely sign language interpreters:

- a. Update policies to reflect that sign language interpretation requests are not limited to American Sign Language (ASL) and also include non-ASL interpretation such as Spanish sign language and Mexican sign language, as well as Certified Deaf Interpreters.

Timeline: December 2019

Responsible staff: Office of Policy and Strategy (OPS), FOD, IRIS/Biometrics, Refugee, Asylum and International Operations (RAIO)/Asylum

- b. Develop a process for ensuring that all offices have ready access to appropriately vetted qualified sign language interpreters.

Timeline: August 2020

Responsible staff: OEIO/Disability Access Coordinator, Management/Contracting and OSI, FOD, IRIS/Biometrics, RAIO/Asylum

- c. Develop a process for receiving and responding to requests for sign language interpreters to prevent appointments from being postponed and give applicants more advance notice that their request will be fulfilled on time.

Timeline: August 2020

Responsible staff: FOD, IRIS/Biometrics, OEOI/Disability Access Coordinator

- d. Develop and disseminate an SOP for internal program use which explains how offices arrange for sign language interpreters when requested.

Timeline: December 2019

Responsible staff: OEOI/Disability Access Coordinator, FOD, IRIS/Biometrics, RAIO/Asylum

- e. Research the advantages and disadvantages of hiring sign language interpreters instead of procuring their services through a contract.

Timeline: November 2019

Responsible staff: OEOI/Disability Access Coordinator

- f. Translate YouTube naturalization practice videos, or other appropriate content, into ASL videos and make them available online.

Timeline: October 2019

Responsible staff: EXA/CAIS, OEOI/Disability Access Coordinator

7. Access to Braille and Other Auxiliary Aids for Individuals Who Are Blind or Have Low Vision

Sometimes individuals who are blind or have low vision cannot access information being relayed to them unless they are provided with a specific type of communication accommodation called an auxiliary aid. USCIS currently offers select print materials related to citizenship in large print, text only, and audio. USCIS will take the following steps to improve access to its communications for individuals who are blind or have low vision:

- a. Create and implement a process to make print materials available in alternative formats, including braille, when requested by individuals with disabilities.

Timeline: November 2019

Responsible staff: OEOI/Disability Access Coordinator, Management/OIDP, OPS, FOD, IRIS/Biometrics and Verification, RAIO/Asylum

- b. Create and implement a process to make the read-aloud portion of the naturalization test available in braille and large print.

Timeline: November 2019

Responsible staff: EXA/CAIS, OEOI/Disability Access Coordinator, Management/OIDP, OPS, FOD

- c. Create and implement a process to make keyboards and braille keyboards available for individuals with disabilities to complete the "writing" portion of the naturalization exam.

Timeline: November 2019

Responsible staff: EXA/CAIS, OEOI/Disability Access Coordinator, OPS, FOD

- d. The [USCIS History Library](#) will purchase and install screen reading software on one of the computers used by the public.

Timeline: Completed May 2018

Responsible staff: IRIS/Records, History Library

Access to Buildings and Facilities

All USCIS buildings and facilities are compliant with applicable building authorities, which require wheelchair accessibility. Formal processes are in place to ensure that all new construction and buildings undergoing major renovations fully comply with the authorities in effect at the time.

1. Automatic Door Openers

Applicable authorities do not require that public entrances and public restrooms be equipped with automatic door openers. In November 2016, USCIS implemented a plan to add automatic door openers to front entrances, restrooms and ceremony rooms for all new construction projects and buildings undergoing major renovations. In the same month, USCIS also started requiring service windows to have lower counters to accommodate individuals who use wheelchairs and allow individuals to sit during the conversation instead of stand.

- a. Create and implement a plan to equip existing facilities with automatic doors on front entrances, public restrooms and ceremony rooms.

Timeline: multi-year, partially completed

Responsible staff: Management/Facilities (FOD, RAIO/Asylum)

2. Wheelchairs

- a. Instruct field and asylum offices that they can consider purchasing wheelchairs for individual use during appointments and interviews.

Timeline: Completed September 2019

Responsible staff: OEOI/Disability Access Coordinator [FOD, IRIS/Biometrics, RAIO/Asylum]

3. Signage

- a. Develop signage guidelines to ensure consistent branding and ensure other accessibility best practices are used when ordering additional post-construction signs.

Timeline: Completed 2019

Responsible staff: Management/Admin/Facilities

4. Accessible Parking

With very few exceptions, USCIS facilities have parking with accessible parking spaces according to Americans with Disabilities Act regulations, or access to nearby parking with accessible parking spaces. Offices that receive frequent complaints about an insufficient number of accessible parking spaces have mechanisms in place to obtain additional accessible spaces.

- a. Review office websites to ensure that disability terminology, accessible parking options, and other accessibility information such as public transportation options are up to date.

Timeline: Completed March 2019

Responsible staff: OEOI/Disability Access Coordinator,
Management/Admin/Facilities, FOD, IRIS/Biometrics, RAIO/Asylum

5. USCIS History Library

- a. Create and implement a plan to ensure that individuals who use wheelchairs have access to the USCIS History Library at 111 Massachusetts Avenue in Washington, D.C.

Timeline: Completed March 2018

Responsible staff: IRIS/Records, History Library

6. Naturalization Sites and other Off-Site Locations

USCIS occasionally hosts naturalization ceremonies at unique locations such as ships and national parks which do not offer full accessibility.

- a. Develop written guidance to ensure that field offices review off-site naturalization locations to identify accessibility barriers and develop a process to notify all relevant applicants of those barriers and how to request any necessary accommodations.

Timeline: January 2020

Responsible staff: FOD, OEOI/Disability Access Coordinator

7. Occupant Emergency Plans

- a. Review all buildings' Occupant Emergency Plans (OEPs) to ensure that they address the evacuation of individuals with disabilities, and if they do not, correct the deficiency. If the office is not responsible for the building's OEP, create a separate written plan.

Timeline: Completed August 2019. **Occupant** Emergency Plans generally address the evacuation of individuals with disabilities (employees and visitors) but not all plans specifically address members of the public in waiting rooms. USCIS has since clarified with offices that plans must specifically address waiting rooms and this requirement will be included in a new evaluation tool to be launched in 2020.

Responsible staff: Management/Office of Security and Integrity (OSI)/Emergency Management and Safety (EMS), FOD, IRIS/Biometrics, RAIO/Asylum

Access to Disability Accommodations

DHS Directive 065-01 states the following about disability accommodations:

“It is the policy of DHS 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 DHS. It is the policy of DHS 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 DHS to give primary consideration to the auxiliary aid requested by the individual with the disability.”

1. Disability Accommodation Request Process

If an applicant needs an accommodation for an appointment (biometrics, interview, naturalization ceremony, etc.), there are several avenues for requesting it. Applicants are encouraged to call the USCIS Contact Center to request an accommodation. Additionally, three immigration forms, the N-400, the [I-485, Application to Register Permanent Residence or Adjust Status](#), and the [I-751, Petition to Remove Conditions on Residence](#), allow applicants to request accommodation directly on the form. However, this option will be eliminated in the next form revision cycle due to operational obstacles with processing requests made on the forms.

If a member of the public needs an accommodation to participate in an outreach event, the outreach invitation notifies the public of their right to request an accommodation

and provides contact information. Requests can also be made through the USCIS Contact Center.

Currently, there is limited guidance for employees about when it is appropriate to request medical documentation in support of an accommodation request.

USCIS will accomplish the following goals to improve its accommodation request process:

- a. Eliminate accommodation request questions on the forms in their next revision cycle because of the development of new avenues for requesting accommodations.

Timeline: Completed 2019 (revised forms not launched yet)

Responsible staff: OEOI/Public Disability Access Coordinator, FOD, OPS

- b. Update and enhance Contact Center scripts to ensure questions about access and accommodations for individuals with disabilities are answered in a consistent manner.

Timeline: Completed June 2019

Responsible staff: OEOI/Public Disability Access Coordinator, EXA/CAIS

- c. Develop a written training aid for the Contact Center on the topic of inquiries about disability accommodations.

Timeline: Completed June 2019

Responsible staff: EXA/CAIS and OEOI/Disability Access Coordinator

- d. Develop and disseminate policy and procedures addressing USCIS standards for requesting medical documentation in support of an applicant's disability accommodation request (including requests for off-site appointments), and update the Policy Manual.

Timeline: January 2020

Responsible staff: OEOI/Disability Access Coordinator, OPS, FOD, IRIS/Biometrics, RAIO/Asylum

- e. Develop an SOP with U.S. Immigration and Customs Enforcement (ICE) to ensure that USCIS interviews of ICE-detained applicants do not result in rescheduled appointments due to lack of communication about requested disability accommodations.

Timeline: December 2019

Responsible staff: RAIO/Asylum

2. Public Notification of the Right to Request Disability Accommodations and the Process, and the Right to File a Complaint Under Section 504

All major programs at USCIS with in-person contact with the public have processes in place to receive and act on requests for accommodations. For FOD and the ASCs, those processes can be found in the Policy Manual as well as in internal resources. The asylum procedures are not in writing or available to the public. Asylum applicants needing an accommodation can call the USCIS Contact Center, or their representative can contact the relevant asylum office directly.

The USCIS public websites have several locations where information about accommodations can be found, such as:

- The [USCIS Policy Manual](#), Volume 12, Part 3;
- [Requesting Special Accommodations](#);
- [Exceptions and Accommodations](#) (Citizenship through Naturalization);
- [Disability Accommodations for Appointments](#) (e-Request);
- [Accessibility Website Policies](#) (Section 508).

USCIS also notifies the public of their right to request disability accommodations and the process for doing so via select notices and correspondence, a poster, and instructions for forms N-400, I-485, and I-751.

USCIS notifies the public of their right to file a complaint alleging a violation of their rights under Section 504 at the bottom of every page on the USCIS website, under Policies, [Civil Rights and Liberties](#).

USCIS will take the following steps to leverage all appropriate avenues to communicate information about accommodations:

- a. Draft, post, and inform asylum stakeholders how to request an accommodation.

Timeline: January 2020

Responsible staff: RAIO/Asylum

- b. Develop a webpage to serve as a central repository for public information about disability access and accommodations at USCIS. The website will include, but not be limited to, information about disability rights, how to request an accommodation, and how to file a complaint. It will contain links to Directive 065-01, this plan, and other resources.

Timeline: Completed June 2018

Responsible staff: OEI/Disability Access Coordinator

- c. [Ask Emma](#) is a virtual online assistant that answers questions. To ensure Ask Emma provides answers to questions related to disability access and accommodations, program this system to recognize relevant words and phrases.

Timeline: Completed December 2018

Responsible staff: EXA/CAIS, OEOI/Public Disability Access Coordinator

- d. Edit disability accommodation section of the Policy Manual, CHAP, ASC SOP, and AAPM to include relevant policy and procedural updates discussed through this plan.

Timeline: January 2020

Responsible staff: OEOI/Disability Access Coordinator, OPS, FOD, IRIS/Biometrics, RAIO/Asylum

- e. For FOD and IRIS/Biometrics, update accommodations request language in notices and correspondence. For RAIO/Asylum, add accommodations request language to all relevant notices and correspondence.

Timeline: Completed May 2019

Responsible staff: OEOI/Disability Access Coordinator, FOD, IRIS/Biometrics, RAIO/Asylum

- f. Develop disability accommodation examples and make them available to the public, as well as to employees.

Timeline: Completed March 2019

Responsible staff: OEOI/Disability Access Coordinator

- g. Update poster on disability accommodations for offices to post.

Timeline: November 2019

Responsible staff: OEOI/Disability Access Coordinator, FOD, IRIS/Biometrics, RAIO/Asylum

- h. Remind USCIS offices that invitations for in-person and virtual engagements must regularly include language describing the process for requesting disability accommodations. Provide sample language.

Timeline: Completed July 2018

Responsible staff: OEOI/Disability Access Coordinator

- i. Post a link to information about Section 504 rights and how to file a complaint on the following USCIS websites (at the bottom of each webpage under Policies, Civil Rights and Liberties):

- www.uscis.gov

- <https://my.uscis.gov/>
- www.e-verify.gov

Timeline: Completed January 2019

Responsible staff: EXA, IRIS/Verification, OEOI/Public Disability Access Coordinator

Training and Resources for Employees

1. Training and Resources for Employees

Content on public accommodation obligations is included in mandatory Basic Training for new officers, as well as in different training webinars and special observances offered throughout the year. However, there is no refresher training module available.

USCIS hosts an annual deaf and hard of hearing awareness campaign, during which a webinar on communication etiquette is offered along with a series of short articles.

Currently, a variety of different resources are available to USCIS employees on the topic of disability etiquette, including handouts, fact sheets, and links to DHS resources. Although many resources are available, those resources are not contained in a central location and have been offered piecemeal over the years.

The following actions will be taken to expand information available to USCIS employees about public accommodations:

- a. Develop an internal webpage to serve as a central repository for information and resources about disability access and accommodations at USCIS.

Timeline: Completed June 2019

Responsible staff: OEOI/Disability Access Coordinator

- b. Develop and advertise a 504 handbook, which will contain information about accessibility considerations and best practices and will serve as a resource for employees. The handbook will include, but not necessarily be limited to, policies and procedures, dos and don'ts, disability terminology, disability etiquette, and contact information for internal POCs who can provide further guidance.

Timeline: November 2019

Responsible staff: OEOI/Disability Access Coordinator

- c. Enhance and update the content in Basic Training on public disability accommodations and etiquette.

Timeline: Completed December 2017

Responsible staff: OEIO/Disability Access Coordinator, FOD

- d. For new asylum/refugee officers, add content to RAIO Combined Training on public disability accommodations and etiquette.

Timeline: January 2020

Responsible staff: RAIO/Asylum

- e. Deliver public accommodations training to officers and others who interact with the public. Record the training and make it available on demand.

Timeline: December 2019

Responsible staff: OEIO/Disability Access Coordinator, FOD, RAIO/Asylum

Responsible Officials

- USCIS Lead Disability Access Coordinator: Equal Opportunity Manager, External Affairs Directorate

Responsibilities: Works with representatives across USCIS program offices and directorates as the central resource for USCIS compliance with Section 504; coordinates USCIS implementation of Directive 065-01, including completing the self-evaluation; and prepares and carries out the USCIS Plan for Improving Access to USCIS Public-Facing Programs and Activities.

- Section 508 Compliance Officer: Section 508 Coordinator and Special Assistant, Management/Office of Information Technology, Applied Technology Division

Responsibilities: Works with software and content development teams to coordinate and serve as a central resource for Section 508 activities throughout USCIS; reviews contracts and procurement requests for compliance; ensures custom-developed software adheres to DHS guidelines; works with content developers to review public-facing communications of all kinds; manages requests to the public-facing accessibility mailbox; leads the Slack channel for USCIS Trusted Testers; helps the DHS Office of Accessible Systems and Technologies develop test standards and tools; and supports other efforts to expand accessibility throughout USCIS.

- Office Accommodations Coordinators: Each field and asylum office has designated an employee(s) who is responsible for handling accommodations requests from applicants. All employees within the office should be familiar with all relevant policies and procedures for handling such requests. For more information, please refer to the [Policy Manual, Volume 1, Chapter 11, Part C](#).

Responsibilities: Coordinates accommodations that require pre-planning, such as sign language interpreters. The breadth of responsibilities varies by office.

Resources

USCIS is committed to providing the resources necessary to ensure compliance with Section 504 and to implement this plan with respect to individuals with disabilities USCIS encounters. USCIS has resources in place to provide accommodations when requested by members of the public who have disabilities. As noted earlier, it is the policy of DHS, and therefore USCIS, to provide any necessary accommodations to afford a qualified individual with a disability full enjoyment of the program or activity, unless doing so would fundamentally alter the nature of the program, service or activity, or result in undue financial and administrative burdens.

Appendix A: Types of Public Interaction

Live

- Service windows
- Adjudication and other interviews
- Outreach and training events, including stakeholder meetings
- Naturalization ceremonies
- Biometrics processing at ASCs
- On-site security screening
- Fraud detection interviews
- USCIS History Library

Electronic

- Facebook, Twitter and Blogs
- Public websites
- Internet content
- Internet applications/systems
- Email and email attachments
- GovDelivery
- Adobe Connect webinars
- Video teleconferences
- Kiosks
- Tablets
- Videos/Multi-media
- Electronic signage
- Biometrics machines

Telephonic

- Telephone calls; teleconferences
- USCIS Contact Center and other public-facing phone numbers

Written

- Letters, notices, requests for evidence
- Forms
- Posters, flyers, brochures, handouts, fact sheets, guides, toolkits, exam prep tools
- PowerPoint presentations
- Press releases
- Briefings and white papers
- Business cards
- Signs
- Naturalization certificates, permanent resident cards, and other official documents