



# Office for Civil Rights and Civil Liberties

## Summary of CRCL's Recommendations and USCIS's Response *Disability Modifications at Application Support Centers*

On June 11, 2024, U.S. Citizenship and Immigration Services (USCIS) responded to a Recommendation Memorandum issued in December 2023 by the Office for Civil Rights and Civil Liberties (CRCL) about disability modifications at Application Support Centers (ASCs). USCIS concurred with CRCL's one recommendation.

### Background

In June 2023, CRCL opened a complaint alleging that USCIS failed to provide a disability modification for the complainant's biometrics appointment at the USCIS ASC in Gardena, California. The complaint alleged that the complainant, who is deaf and mute, submitted a request for an American Sign Language (ASL) interpreter in advance of her biometrics appointment, and USCIS denied her request. The complaint further alleged that when she arrived for her appointment, ASC's staff attempts to communicate led to significant miscommunication.

### Investigation

CRCL's investigation into alleged disability discrimination in violation of Section 504 of Rehabilitation Act of 1973, as amended (Section 504) included a review of USCIS records for the complainant, as well as USCIS policies and procedures related to disability modification requests, including the USCIS Policy Manual and the USCIS Standard Operating Procedures for ASCs. CRCL found that USCIS did not follow its procedures when it denied the complainant's request for an ASL interpreter and did not engage in the interactive practice, as required by Section 504. CRCL determined that USCIS discriminated on the basis of disability in violation of Section 504 by failing to provide a reasonable disability modification to the complainant. In accordance with federal regulations, CRCL notified the complainant of USCIS's Section 504 violation and required USCIS to reimburse the complainant for expenses incurred as a result of the miscommunication that occurred at her appointment.

### Recommendations

In addition to the letter to the complainant, CRCL sent USCIS a Recommendation Memorandum on December 7, 2023, that notified USCIS of the Section 504 violation, explained the remedy, and included one recommendation regarding USCIS's handling of disability modifications at ASCs. On June 11, 2024, USCIS concurred with the recommendation.

USCIS agreed to provide training to all field office disability modification points of contact about providing sign language interpreters at biometrics appointments. USCIS also agreed to develop a video training module for ASC staff about disability modification requests from the public and to update ASC operating procedures to include additional information about disability modifications.

*CRCL provides the public with documents related to complaint investigations. After it has been prepared and reviewed, CRCL will post a redacted version of this Recommendation Memorandum on our [website](#) that will contain additional information about the complaint investigation and CRCL's findings and recommendations.*