

## **Federal Protective Service Section 504 Compliance: Component Plan**

The Federal Protective Service (FPS) is charged with the safety, security, and protection of employees and visitors of federal facilities. Offices and programs within FPS interact directly with members of the public daily, ensuring program accessibility, physical accessibility, effective communication, and reasonable modification of policies, practices, and procedures for individuals with disabilities.

### **ROLE OF THE PROTECTIVE SECURITY OFFICERS**

FPS-contracted Protective Security Officers (PSOs) are located in GSA-leased or public buildings. It is the responsibility of the PSO to control access to federal facilities and to assist in ensuring the safety of federal agency customers and visitors while on federal property. Access control includes, but is not limited to, checking visitor and employee identification; operating security equipment such as x-ray machines and magnetometers to screen for prohibited materials; operating or monitoring security cameras and/or alarms and responding to emergencies; and reporting crimes and incidents to the FPS MegaCenter.

### **ENGAGED OFFICES AND PROGRAMS**

- Protective Security Operations
- Training and Professional Development/Weapons and Tactics
- Diversity, Equity & Inclusion
- Human Capital Operations
- Protective Security Officer Development and Training Oversight Branch

Participants from the above offices were engaged to provide experiences, feedback, recommendations, shortfalls, goals, objectives, and ways that FPS can enhance the program and activity accessibility to persons with disabilities. Focus areas included, but were not limited to, the development and establishment of Plans (i.e., Emergency Action Plans); hiring and training front line personnel (including contractors); and interacting with members of the public who are individuals with disabilities, including people with mobility disabilities who use assistive equipment and/or devices, people who use service animals, people who are deaf or hard of hearing, and people who are blind or have low vision, among others.

### **KEY INDIVIDUALS INVOLVED IN THIS EFFORT**

- FPS Disability Access Coordinator (DAC) – Nichelle Cromwell
- Division Directors, Chief, PSO Protective Security Officer Development and Training, PSO Project Managers

### **SELF-EVALUATION APPROACH**

The FPS DAC initiated and held a meeting with key individuals, to include program managers, other headquarters personnel, regional personnel, and counterparts. Information was relayed

about DHS Directive 065-01, the required self-evaluation, and the individuals' involvement and expected actions/requirements. Defined personnel engaged their offices and programs, conducted an assessment, and maintained records. FPS's points of interaction with the general public and functions include:

- Conducting job duties at security/screening posts;
- Operating a system that issues public announcement alerts/warnings that are accessible to individuals with disabilities;
- Developing accessible emergency evacuation procedures;
- Communicating with the public about how to submit complaints;
- Disseminating accessible written material through websites, broadcasts, and social media;
- Carrying out deployments, to include providing security during Presidential Inaugurations and situations involving civil unrest/disobedience; and
- Ensuring the communication of accessible material and information to individuals with disabilities through strategies such as audio and video description and effective verbal communication (e.g., sitting or standing at eye level with the individual and speaking directly to the individual and not the person he/she is with).

## **STAKEHOLDER INVOLVEMENT**

On February 15, 2023, the FPS DAC participated in the DHS Office for Civil Rights and Civil Liberties' (CRCL's) engagement with external stakeholders from the disability community. Some stakeholders reported knowing of instances where individuals with disabilities experienced difficulties in proceeding through the screening process at federal buildings. The FPS DAC thanked the stakeholders for their input and committed to looking into any shortfalls in training of front-line personnel and managers as part of the FPS self-evaluation.

An initial conference call with the internal FPS stakeholders occurred. Section 504 of the Rehabilitation Act and DHS Directive 065-01 were discussed. Additionally, participants were informed as to why they are identified as the stakeholders and informed why their support was needed. CRCL's self-evaluation tool was distributed to the evaluating offices, and they were asked to carry out the assessment within the context of their office and program responsibilities and procedures, and their communication and interaction with individuals with disabilities. The participants submitted their feedback and shared existing FPS plans, manuals, and guides that address practices that are relevant to interactions with members of the public who are individuals with disabilities.

## **CONDUCTING THE SELF-EVALUATION**

Part A, the initial step to complete the self-evaluation, involved assessing the accessibility of program policies and practices that govern the administration of each relevant FPS program. Documentation requested included policies, manuals, procedures, plans, guidance, and directives. The questions in Part A of the tool applied to the performance of federal employees and contractors who carry out activities on behalf of FPS.

Part B of the tool provided an opportunity to focus on communication. Specifically, it examined how personnel work within the procedures and policies that govern interactions with members of

the public, while ensuring effective communication and furnishing auxiliary aids and services for individuals with disabilities.

Part C focused on the program's operational settings throughout FPS nationwide. Ensuring physical accessibility for individuals with disabilities was evaluated for the identification of any barriers.

As part of the overall assessment, all complaints and interactions with individuals with disabilities that raised concerns, accessibility of information, and security and assistance available to individuals with disabilities were documented. The information available was evaluated to determine how best to resolve disability-related complaints and concerns and address existing areas that lack access for individuals with disabilities efficiently and effectively going forward.

Following the FPS DAC's full review and assessment of the completed self-evaluation tools, the DAC re-convened with internal the stakeholders to discuss the evaluation results. The DAC specified the barriers to access for individuals with disabilities and identified possible actions to be taken to address them. Information obtained was beneficial in the development of this FPS Component Plan.

## **RESULTS OF SELF-EVALUATION**

The following observations were documented during the FPS self-evaluation:

- FPS requires and conducts annual Public Order Safety Commanders training which includes information about providing access for individuals with disabilities.
- PSOs are provided the FPS PSO Security Manual and Resource Tool (SMART) book. The SMART book includes instructions on how to appropriately interact with and screen individuals with disabilities.
- All PSOs are required to take the Basic Training before assignment to a post. The FPS National Weapons Detection Training Program (NWDTP) established procedures to screen service animals into FPS facilities and PSOs assigned to screening stations are required to complete the NWDTP.
- Post Orders for the PSOs include instructions on how to interact with and screen individuals with disabilities.
- FPS has access to the use of sign language interpreters and video remote interpretation. Agencies occupying GSA-leased buildings, in which some of the PSOs are assigned, are responsible for providing the sign language interpreters when requested

## **FINDINGS**

- Currently 10,000 federal buildings are access controlled by PSOs.
- There is improvement needed in the daily supervision of PSOs with respect to screening individuals with disabilities.
- Training is needed for PSOs to be more informed and educated when interacting with and screening individuals with disabilities and updated training should include this topic using scenarios.

- Available information and awareness about how to interact with individuals with disabilities varies throughout FPS.

## **IDENTIFIED GAPS AND BARRIERS**

- The lack of a standard operating procedure (SOP) to ensure that meetings are accessible to individuals with disabilities.
- The need for scenario-based training about interacting with and screening individuals with disabilities for PSOs.
- The lack of accessible materials available on the use of auxiliary aids and services.
- The need to develop a process that informs members of the public who are individuals with disabilities how to request assistance, including auxiliary aids and services such as sound amplifiers and video remote interpretation.
- The lack of information (e.g., websites, Connect Pages, etc.), available to individuals with disabilities and FPS employees about how to request and obtain auxiliary aids and services.
- The need for instruction to explain methods for filing a complaint and a process to ensure that all complaints are addressed.
- The need to update and deliver recurring PSO and employee training to educate personnel on programs, activities, and services for ensuring nondiscrimination while interacting with and screening individuals with disabilities.
- The lack of consistency among FPS headquarters and FPS regions with respect to training and information about interacting with and screening individuals with disabilities.
- The need to implement and enforce in a consistent manner (across FPS headquarters and FPS regions) procedures to ensure access to FPS programs and services for individuals with disabilities.
- The need to ensure the development and posting of information about providing access for individuals with disabilities on the FPS Human Capital Operations Division (HCOD) Connect Page.

## **TRAINING/INFORMATION TO ADDRESS GAPS AND BARRIERS**

- Update and deliver annually PSO training regarding access for individuals with disabilities, incorporating real life scenarios.
- Develop new Basic Training for PSOs related to interacting with and screening individuals with disabilities who are accompanied by service animals.
- Develop new Basic Training that incorporates an entire lesson for interacting with and screening individuals with a disability.
- Require mandatory Section 504 disability compliance training for FPS personnel to communicate the requirements federal agencies have to ensure nondiscrimination for individuals with disabilities.
- Coordinate with the Public Affairs Division to disseminate information to inform individuals with disabilities regarding their right to request a reasonable modification, how to file a Section 504 complaint, and what to expect during the screening process.
- Include disability access information on the FPS HCOD Connect Page to include references, policies, and contact information.

## **POLICY/PROCEDURES TO ADDRESS GAPS AND BARRIERS**

It is the obligation of FPS to afford individuals with disabilities an equal opportunity to access services, programs, events, and activities without being subject to discrimination. To support FPS's responsibilities, the following actions will be implemented:

- Develop an FPS public-facing reasonable modification policy and procedures that will include FPS's obligations under Section 504 and provide the steps for an individual with a disability to request an auxiliary aid or service (such as a qualified sign language interpreter) or a reasonable modification of policy, practice, or procedure (such as permitting the entry of a service animal into the facility). The document will also inform the requester of the steps to take and what actions to expect from FPS.
- Develop internal instructions for personnel that define how auxiliary aids and services will be furnished to individuals entering federal facilities to interface with agency programs. It will be the policy of FPS to give primary consideration to the auxiliary aid requested by the individual with a disability.
- Post information to ensure that individuals with disabilities are aware of their right to request auxiliary aids and services, including but not limited to, qualified sign language interpreters, open/closed captioning, assistive listening devices, screen reader software, large print materials, and braille materials.
- Ensure the posting of "How To" information for individuals who want to file a Section 504 complaint.
- Develop a policy and procedure for receiving and documenting complaints, transmitting them to CRCL for investigation, and monitoring how the complaints were addressed/resolved.

## **IMMEDIATE STEPS FOR IMPLEMENTATION**

In addition to the planned actions detailed in the above sections on developing training and policy, FPS has taken several immediate steps to strengthen nondiscrimination and equal access for individuals with disabilities. These actions include:

- Beginning to draft the FPS reasonable modification policy and procedures.  
Responsible Staff: DAC  
Anticipated Timeline: Policy finalized by December 31, 2024
- Developing instructions/guidance for members of the public about how to file a complaint and determining the system of record to document FPS's receipt, investigation by CRCL, and disposition of all complaints.  
Responsible Staff: DAC and Office of Internal Investigations  
Anticipated Timeline: Draft instructions/guidance complete by November 15, 2024
- Developing guidance to request auxiliary aides and services for those entering federal buildings.  
Responsible Staff: DAC, PSOPM  
Anticipated Timeline: February 1, 2025
- Updating PSO training to include modules on providing reasonable modifications of policies, practices, and procedures for individuals with disabilities and screening individuals accompanied by service animals.

Responsible Staff: PSO Development and Training Oversight  
Timeline: In progress.

- Developing reasonable modification and disability training.

Responsible Staff: DAC

Timeline: Currently taking place and will continue

- Ensuring accessibility for individuals with disabilities of information on various platforms.

Responsible Staff: DAC, FPS Public Affairs Office

Timeline: Started and information (job fairs, events, etc.) continuously added as necessary.

## **CLOSURE**

Based on the self-evaluation, FPS needs to enhance training, policies, practices, and communication to ensure nondiscrimination for individuals with disabilities. The identified gaps and barriers are largely related to PSO training, employee awareness, the development of policy, and ensuring public awareness regarding reasonable modifications and auxiliary aids and services. Under this Plan, FPS seeks to ensure that individuals with disabilities have equal access, available assistance when needed, and equal opportunity within FPS programs and activities.