



**Department of  
Housing Preservation  
& Development**

**Housing Preservation & Development (HPD)**

**Local Law 12**

**5-Year Accessibility Plan**

# Table of Contents

Table of Contents .....	2
Contact Information .....	3
Grievance Procedure:.....	3
Website Accessibility Statement: .....	3
Agency Overview .....	4
HPD’s Mission.....	4
HPD’s History.....	4
Executive Summary .....	5
Accessibility Statement.....	5
Agency Plan .....	6
A. Physical Access – .....	7
B. Workplace Inclusion.....	21
C. Effective Communication .....	24
D. Digital Access .....	25
E. Programmatic Access .....	26
F. Additional Initiatives .....	26
Appendix .....	29
Glossary .....	30

# **Contact Information**

**Created by: The Office of Diversity, Equity and Inclusion / Equal Employment Opportunity**

**Nichole Willis, Accessibility/Disability and Policy Services Advisor**

**Email: [Accessibility@hpd.nyc.gov](mailto:Accessibility@hpd.nyc.gov)**

**Phone: 212-863-6486**

**Address: 100 Gold St, New York, NY 10038**

## **Grievance Procedure:**

**HPD's Grievance Process can be accessed [here](#).**

## **Website Accessibility Statement:**

**HPD's Website Accessibility Statement can be accessed [here](#).**

# **Agency Overview**

## **HPD's Mission**

Our mission is to promote quality and affordability in the city's housing, and diversity and strength in the city's neighborhoods.

We do this by maintaining building and resident safety and health, creating opportunities for New Yorkers through housing affordability, and engaging New Yorkers to build and sustain neighborhood strength and diversity.

Because every New Yorker deserves a safe, affordable place to live in a neighborhood they love.

## **HPD's History**

Established in 1978, the Department of Housing Preservation and Development is the primary municipal entity responsible for affordable housing development throughout New York's five boroughs. HPD is entrusted with the task of creating and upholding the city's inventory of affordable housing, among other functions, powers, and duties set forth in [Chapter 61 of the New York City Charter](#).

Currently, HPD is actively engaged in the [Housing New York](#) initiative, which aims to generate and safeguard 300,000 units of affordable housing by 2026. As of the close of 2021, the City of New York has financially supported the construction of more than 200,000 affordable units.

In addition to its housing development efforts, HPD plays a crucial role in enforcing the [City's Housing Maintenance Code](#), which sets minimum health and safety standards that must be met in dwelling units in the City, including standards for heat, hot water, mold, pest control, gas leaks, fire safety, and more. Annually, HPD conducts over 500,000 inspections and employs a range of code enforcement strategies to address building conditions, including owner outreach, legal actions in Housing Court, and emergency repairs.

Furthermore, HPD collaborates with neighborhoods in the planning process, partnering with other city agencies and local communities to strategize for the

preservation and expansion of affordable housing. This collective effort aims to create more inclusive, diverse, and habitable neighborhoods.

HPD is headquartered in Lower Manhattan and maintains smaller branch offices in each of the City's five boroughs.

## **Executive Summary**

HPD has conducted and will continue to conduct a thorough review of agency workplace services, programs, and activities over the next 5 years to ensure the agency is accessible, accommodating, and inclusive of people with disabilities.

This report details the findings from HPD's review, states the corrective actions planned to increase accessibility, and sets forth timelines to address any corrective actions.

## **Accessibility Statement**

At HPD, ensuring accessibility is a fundamental principle that permeates all of the agency's operations and activities and contributes to our long-term goals. We recognize that accessibility is not just a legal requirement but an ethical commitment that enhances the inclusivity and usability of our services and programs.

HPD is committed to upholding the following principles in forming its policies, practices, and procedures:

- Ensuring that people with disabilities can access HPD resources and services as renters, owners, developers, vendors, or HPD employees, while preserving their dignity and independence. This involves delivering quality housing, maintaining affordability, and offering various services tailored to the needs of people with disabilities.
- Adapting communication methods when engaging with people with disabilities, considering their specific disability and preferred mode of communication.
- Ensuring sites provide equal access for people with disabilities.

These principles form the foundation upon which HPD operates to support inclusivity and accessibility for people with disabilities.

HPD and the Mayor’s Office for People with Disabilities (MOPD) are committed to exploring ways to make New York City’s affordable housing stock more accessible to people with disabilities.

## **Agency Plan**

[Local Law 12 of 2023](#) mandates that HPD create a comprehensive accessibility plan outlining present and future actions over a five-year span. This plan aims to guarantee accessibility, accommodation, and inclusivity for people with disabilities across five facets: Physical Access, Programmatic Access, Workplace Inclusion, Effective Communications, and Digital Access.

### **Methodology:**

In order to determine whether HPD is meeting the needs of clients and staff with diverse disabilities, HPD conducted a physical survey of eight (8) HPD locations: the main headquarters, six (6) borough service centers, and one Emergency Operations Division site. The plan addresses key areas of physical access, including but not limited to workstations, private offices, conference rooms, service counters, pantries, restrooms, staircases, signage, elevators, entrances, lobbies, and programmatic access. The methodology employed in this study also involved conducting interviews with Human Resources (HR) professionals and HPD's Digital Inclusion Officers (DIO's) as well as utilizing the MOPD self-evaluation questionnaire.

HPD created a comprehensive accessibility plan and then shared the plan with its staff and members of the public with a request for feedback. HPD distributed the plan and request for feedback through agency-wide communication channels, which included agency-wide emails, placement of QR codes in the Division of Tenant and Owner Resources and Code Enforcement offices, announcements on HPD websites, digital bulletin boards, and posting on all HPD social media platforms. In addition, MOPD posted the proposed plan and notice of opportunity to comment on the NYC Agency Accessibility Plans website and publicized the site via its email list, social media channels and at its quarterly community meeting in early January.

## **A. Physical Access – Implementation Span: 2024-2028.**

In order to ensure HPD meets the needs of people with diverse disabilities, HPD conducted a survey of the physical spaces in its facilities to assess their accessibility. Using the guidelines provided by the [2010 ADA Standards for Accessible Design](#) as a reference, we sought to gain a comprehensive understanding of the current state of physical access, identify areas that are in need of improvement, and areas where no change was required. The report is structured to provide an in-depth analysis of each location utilized by HPD. It offers insights into ADA compliance, outlines challenges that persist, and offers actionable recommendations for furthering our collective mission of achieving accessible physical spaces.

### **HPD operates out of the following City-owned buildings:**

1. 100 Gold Street, New York NY 10038
2. 345 Adams Street, Brooklyn, NY 11201
3. 1932 Arthur Avenue, 3rd Floor, Bronx, NY 10457
4. 10 Richmond Terrace, Staten Island, NY 10301
5. 120-55 Queens Boulevard, Kew Gardens, NY 11424
6. 701 Euclid Avenue, Brooklyn, NY 11208

### **HPD also operates out of the following leased spaces:**

7. 94 Old Broadway, 7th Floor, New York, NY 10027
8. 106 East 105<sup>th</sup> Street, New York, NY 10029

DCAS is responsible for assessing the accessibility of the common areas in the city-owned buildings they manage. Agencies are responsible for assessing the accessibility of the common areas in the leased spaces listed above and will work with landlords to address the findings of those assessments. HPD is responsible for the agency demised areas (the offices themselves).

In the findings described below, if an area was found to be “accessible,” that means the area complied with the requirements for physical accessibility in the 2010 ADA Standards for Accessible Design.

## **Key Findings by Location:**

### **Location 1: HPD Headquarters:100 Gold Street, New York, NY 10038**

Floors Occupied: 1, 3-9

A comprehensive survey was carried out on each floor, presenting a detailed analysis of the specific physical access enhancements required for every floor.

### **Physical Access for HPD Employees:**

#### **Lobby and 1st Floor:**

The survey covered the lobby and 1<sup>st</sup> floor occupied by HPD and found that the interior office spaces are accessible, and entry into the building is accessible via the Frankfort Street entrance. HPD's Division of Tenant and Owner Resources' Client Service area is accessed using the 100 Gold Street entrance. There are offices located on the first floor that can only be accessed by using stairs if approached through the 100 Gold Street entrance. People with disabilities would need to utilize the accessible entrance on Frankfort Street.

#### **3<sup>rd</sup> Floor:**

The survey covered a section of the 3<sup>rd</sup> floor occupied by HPD and found that the office spaces are accessible. The rest of the floor is shared by the Department of Education, Grow NYC, and the Department of Parks and Recreation.

#### **4<sup>th</sup> Floor:**

The survey covered a section of the 4<sup>th</sup> floor occupied by HPD and found that the office spaces are accessible. The rest of the floor is shared by the Department of Education and the Office of Collective Bargaining.

#### **5<sup>th</sup> Floor:**

The survey encompassed the entirety of the 5<sup>th</sup> floor. Although most of the space is accessible, the five restrooms located on the floor did not meet the accessibility standard. For purposes of this report, the issues found will be organized as follows:

1. Men's Restroom 5A



2. Women's Restroom 5A
3. Men's Restroom 5B
4. Women's Restroom 5B
5. Accessible Restroom 5

### **Access Issues in All Restrooms:**

1. The wall hooks in the accessible stalls are installed above the ADA-recommended height range of 15 to 48 inches from the floor.
2. The pipes under the restroom sinks are not insulated to protect against contact.
3. The existing signage does not indicate whether the restroom includes an accessible-compliant stall or specify the location of an accessible restroom.

### **Men's Restroom 5A:**

1. There is no mirror positioned above the ADA-compliant sink.
2. The available turning space is less than a 60-inch minimum diameter, making it uncomfortable for a wheelchair user to maneuver and turn freely.

### **Women's Restroom 5A:**

1. The towel dispenser is installed above the ADA-recommended height range of 15 to 48 inches from the floor.

### **Men's Restroom 5B:**

1. Two of the four sink knobs necessitate a tight grip, pinching, or twisting of the wrist for operation.

### **Accessible Restroom 5:**

1. The restroom does not have a grab bar positioned behind the toilet, and the required 30x48 inches of space for maneuvering in the stall is not met.
2. The toilet height is 12 inches when measured at the top of the seat, which does not comply with the ADA requirement range of 17-19 inches.

## **Corrective Actions to be coordinated by DCAS and General Services for the 5<sup>th</sup> Floor:**

To address the identified accessibility issues, the following corrective measures are required:

### **All Restrooms:**

1. Wall hooks in all accessible stalls will be repositioned to an appropriate height for wheelchair access.
2. Signage will be attached to each restroom door, clearly marking the accessible restroom's location and specifying the presence of an accessible stall within.

### **Men's Restroom 5A:**

1. Installation of a mirror over the accessible sink.
2. Expanding the space to allow wheelchair users to comfortably maneuver within the restroom.

### **Women's Restroom 5A:**

1. Lowering the placement of the towel dispenser to make it accessible for individuals using a wheelchair.

### **Men's Restroom 5B:**

1. Replacing sink knobs to eliminate the need for tight grips, pinching, or wrist twisting to operate the faucets, ensuring ease of use for all.

### **Accessible Restroom 5:**

1. Installing a grab bar behind the toilet.
2. Installing new toilets to meet the ADA specifications, ensuring they are within the required height range of 17-19 inches.

## **6th Floor:**

The survey encompassed the entirety of the 6<sup>th</sup> floor. Although mostly accessible, it revealed issues with the restrooms and signage. For purposes of this report, the issues found in the restrooms will be organized as follows:

1. Men's Restroom 6A
2. Women's Restroom 6A
3. Men's Restroom 6B
4. Women's Restroom 6B
5. Accessible Restroom 6

## **Access Issues in All Restrooms:**

1. The pipes under the restroom sinks are not insulated to protect against contact.
2. The existing signage does not indicate whether the restroom includes an accessible stall or specify the location of an accessible restroom.

## **Men's Restroom 6A:**

1. The signage inaccurately indicates the presence of an accessible stall in the restroom.

## **Women's Restroom 6A:**

1. The hook in the accessible stall is positioned higher than the ADA requirement of between 15 to 48 inches above the floor.

## **Accessible Restroom 6:**

1. The ADA restroom sign is higher than the ADA requirement of 48 inches above the floor.

## **Corrective Actions to be coordinated by DCAS and General Services for the 6<sup>th</sup> Floor:**

### **All Restrooms:**

1. Insulating pipes under the accessible restroom sink: The pipes will be insulated to prevent potential hazards and ensure safety.

### **Women's Restroom 6A:**

1. Wall hooks in all the accessible restrooms stalls will be repositioned to an appropriate height for wheelchair access.

### **Accessible Restroom 6:**

1. Adjust the height of the restroom sign to meet the ADA standard of 48 to 60 inches above the floor.

### **7<sup>th</sup> Floor:**

The survey encompassed the entirety of the 7<sup>th</sup> floor. Although most of the floor is accessible, it revealed issues with the restrooms, signage and the water fountain located on the floor. The issues found will be organized as follows:

1. Men's Restroom 7A
2. Women's Restroom 7A
3. Men's Restroom 7B
4. Women's Restroom 7B
5. Men's Restroom 7C
6. Accessible Restroom 7

### **Access Issues:**

#### **Men's Restroom 7A:**

1. There is no accessible stall.
2. Existing signage inaccurately states the restroom has an accessible stall.
3. Lack of ADA signage with the location of an accessible stall.
4. Sink knobs require twisting of the wrist.

#### **Women's Restroom 7A:**

1. The mirror is higher than the 40-inch ADA requirement.
2. Coat hook in the accessible stall is positioned higher than the ADA requirement of between 15 to 48 inches above the floor.

#### **Men's Restroom 7B:**

1. The existing signage does not specify the location of an ADA-accessible restroom.

### **Women's Restroom 7B:**

1. The existing signage does not specify the location of an accessible restroom.

### **Men's Restroom 7C:**

1. The existing signage does not specify the location of an accessible restroom.

### **Accessible Restroom 7:**

1. The accessible restroom door lacks any signage.
2. There's a single grab bar positioned behind the toilet.
3. A grab bar cannot be installed on the wall to the side of the toilet due to the presence of toilet tissue and toilet cover dispensers nearby.
4. The coat hook within the accessible stall exceeds the ADA height requirement, positioned beyond the range of 15 to 48 inches from the floor.
5. The towel dispenser is mounted above the ADA standard height of 48 inches from the floor.
6. Absence of a mirror inside the restroom.

### **Corrective Actions to be coordinated by DCAS and General Services for the 7<sup>th</sup> Floor:**

#### **All Restrooms:**

1. Insulating Pipes: The pipes underneath the accessible sink will be insulated to prevent potential hazards and ensure safety.
2. ADA Signage will be placed stating where the accessible restroom is located.

#### **Men's Restroom 7A:**

1. ADA signage will be revised to indicate the absence of an accessible stall.
2. Faucet knobs replaced with fixtures that do not require the twisting, pinching or tight grasping with the wrist.

#### **Women's Restroom 7A:**

1. Lower the coat hook and mirror to ADA required height.

### **Women's Restroom 7B:**

1. ADA Signage placed stating where the accessible restroom is located.

### **Accessible Restroom 7:**

1. Install ADA signage.
2. Remove toilet tissue dispensers from the side of the toilet to permit installation of a side grab bar.
3. Lower the coat hook to ADA required height.
4. Install a mirror above the sink no more than 40 inches.

### **8th Floor:**

The survey encompassed the entirety of the 8<sup>th</sup> floor, and although most of the floor is accessible, it revealed certain issues with the restrooms and signage. For the purpose of this report, the issues will be organized as follows:

1. Men's Restroom 8A
2. Women's Restroom 8A
3. Men's Restroom 8B
4. Women's Restroom 8B
5. Gender Neutral Restroom

### **Access Issues- All Restrooms:**

1. None of the restrooms meet the standards for an ADA-compliant stall.

### **Men's Restroom 8A:**

1. Lack of ADA signage with the location of an accessible stall.
2. Towel dispenser is hung higher than the ADA requirement of 48 inches above the floor.

### **Women's Restroom 8A:**

1. Lack of ADA signage with the location of an accessible stall.
2. Towel dispenser is hung higher than the ADA requirement of 48 inches above the floor.

### **Men's Restroom 8B:**

1. There's a lack of signage specifying the type of restroom and the location of an accessible stall.
2. Sink knobs require twisting of the wrist.

### **Women's Restroom 8B:**

1. Lack of ADA signage with the location of an accessible stall.
2. Sink knobs require twisting of the wrist.

### **Gender Neutral Restroom:**

1. Lack of ADA signage with the location of an accessible stall.
2. Insufficient maneuvering space for a wheelchair.
3. Toilet dispensers are located directly above the side grab bar.
4. No coat hook located in the room.

### **Corrective Actions to be coordinated by DCAS and General Services for the 8<sup>th</sup> Floor:**

1. Proper ADA signage will be placed on all restrooms.
2. Faucet knobs replaced with fixtures that do not require twisting of the wrist.
3. Lower towel dispenser to ADA required height.
4. Relocate toilet tissue dispensers from the side of the toilet.
5. Install a coat hook in the gender-neutral restroom.

### **9<sup>th</sup> Floor:**

The survey encompassed the entirety of the 9<sup>th</sup> floor, and although most of the floor is accessible, it revealed certain issues with the restrooms, signage and the water fountain situated on the floor. For the purpose of this report, the issues found will be organized as follows:

1. Men's Restroom 9A
2. Women's Restroom 9A
3. Men's Restroom 9B
4. Women's Restroom 9B

### **Access Issues:**

1. None of the restrooms have an accessible stall. Additionally, there are no single-user accessible restrooms available on the floor.
2. ADA signage must be placed in the lobby directing visitors.
3. The water fountain exceeds the ADA requirement of being positioned no higher than 48 inches above the floor.

**Corrective Actions to be coordinated by DCAS and General Services for the 9<sup>th</sup> Floor:**

1. Both the Men's and Women's restroom must be renovated to include accessible stall.
2. ADA signage will be placed in the 9<sup>th</sup> floor lobby. Signage will also be placed at all restrooms (after completion of the accessible stall or creation of the accessible restroom) informing users where the accessible restroom is located.
3. Water fountain will be replaced.
4. The pipes under the accessible restroom sinks will be insulated to prevent potential hazards and ensure safety.

DCAS informed HPD's General Services Division that they currently plan to start the corrective actions listed above by the end of 2025.

**Location 2: 345 Adams Street, Brooklyn, NY 11201**

HPD manages a Borough Service Center at this address, which is a building operated by DCAS. The center, open to the public Monday through Friday, occupies the entire 10<sup>th</sup> floor. The entire 10<sup>th</sup> floor met all accessibility standards.

**Location 3: 1932 Arthur Ave, Bronx, NY 10457- Borough Service Center**

HPD manages a Borough Service Center at this address, located on the 3<sup>rd</sup> floor. The center is open to the public Monday through Friday and shares its common areas with NYPD. Access to the floor is via an elevator for both staff and visitors. While most of the space meets accessibility standards, the following issues were identified:

**Access Issues:**

1. Men's and Women's staff locker rooms lack benches.



**Corrective Actions to be coordinated by DCAS and General Services at 1932 Arthur Ave:**

1. Installation of ADA-compliant benches in both locker rooms will be implemented.

**Location 4: 10 Richmond Terrace, Staten Island, NY 10301 -Borough Service Center**

HPD manages a Borough Service Center at this address. The center, open to the public Monday through Friday, occupies a part of the 2<sup>nd</sup> floor, which is shared with Richmond County Supreme Court. Access to this floor is via an elevator or stairs for both staff and visitors. While most of the space meets accessibility standards, the following issues were identified:

**Access Issues:**

1. No ADA signage in the entry way.
2. Entry door leading into the service center office is 31 inches wide.

**Corrective Actions to be coordinated by DCAS and General Services at 10 Richmond Terrace:**

1. ADA signage will be placed on the office and entry way doors/hallway.
2. Office entry way door will have to be widened to the ADA requirement of 36 inches.

**Location 5: 120-55 Queens Boulevard, Kew Gardens, NY 11424**

HPD manages a Borough Service Center within the courthouse at this address. The center, open to the public Monday through Friday, occupies a part of the 1<sup>st</sup> floor, which is shared with the Department of Buildings and the Queens County Supreme Court. The office space meets all accessibility standards.

## **Location 6: 701 Euclid Avenue, Brooklyn, NY- Borough Service Center**

HPD oversees a Borough Service Center at this address and is responsible for the management of the building. The site operates Monday through Friday and is accessible to the public. This assessment covered the parking lot, main floor, customer service area, cellar area and multiple restrooms. While most areas met accessibility standards, the following issues were found:

### **Restrooms:**

The building houses five restrooms: two men's rooms, two women's rooms, and one gender neutral restroom. None of the restrooms are utilized by members of the public. The restrooms do not have appropriate ADA signage. For the purpose of this report, the restrooms are labeled as listed below, and a detailed assessment follows:

1. Men's Room A
2. Women's Room A
3. Men's Room Locker Room B
4. Women's Room Locker Room B
5. Gender Neutral Restroom

### **Access Issues:**

1. The door handles to the main entrance requires an ADA compliant lock set.
2. ADA signage is needed for the entire building.
3. The main entrance door closer closes in less than 5 seconds.
4. The men's locker room bench does not have back support.
5. The men's room on the main floor does not have enough clear space for a wheelchair to access the ADA stall.
6. Mirrors in all restrooms will have to be lowered.
7. Grab rails have to be installed in the Men's Locker room restroom.
8. The saddle in the Women's locker room restroom must be replaced.

### **Corrective Actions to be managed by General Services at 701 Euclid Ave:**

HPD will take the following measures to address the accessibility concerns delineated previously.

1. The main entrance door handles will be changed.
2. ADA signage placed around the building.
3. The bench in the men's locker room will be placed against a wall for back support.
4. The mirrors in the Men' and women's main restroom will be lowered to 44 inches.
5. Install grab bars in the men's locker room restroom.
6. The saddle in the Women's locker room restroom will be replaced.

**Location 7: 94 Old Broadway, New York, NY 10027- Borough Service Center**

This building is owned and managed by Columbia University, operates Monday through Friday, and is accessed by members of the public. HPD occupies the entire 9<sup>th</sup> floor, which can be accessed by elevator. This assessment covered the 9<sup>th</sup> floor, including the customer service area and four restrooms. While most areas met accessibility standards, the areas that did not meet accessibility standards are described below. For the purpose of this report, the restrooms are identified as follows:

1. Men's Employee Restroom A
2. Women's Employee Restroom A
3. Men's Public Restroom B
4. Women's Public Restroom B

**Access Issues:**

1. ADA signage is needed throughout the floor, restrooms, lobby and entryway.
2. Add door closers to all restroom doors.
3. Add hooks to all restrooms.
4. Lower the towel dispensers in accessible restrooms.
5. Insulate all pipes under sink in all accessible restrooms.
6. Men's Restroom A – Move flush controls.
7. Women's Employee Restroom A – More maneuvering space is needed in the stall.
8. Women's Employee Restroom A – Coat hooks need to be lowered to between 15 and 48 inches.

9. Women's Employee Restroom A – The sink needs to be altered to provide 27 inches of clearance and at least 8 inches under the sink for knee space.
10. Women's Employee Restroom A – Lower the towel dispensers.
11. Men's Public Restroom B – The toilet must be raised or replaced to meet the required height of between 17 and 19 inches.
12. Men's Public Restroom B – Add a tissue dispenser.
13. Men's Public Restroom B – The mirror must be lowered to at least 40 inches.
14. Women's Public Restroom B – Grab bar must be reinstalled 54 inches from the rear wall.

**Corrective Actions to be managed by General Services at 94 Old Broadway:**

HPD will explore the following measures to address the accessibility concerns delineated previously.

1. ADA signage placed throughout the floor, restrooms, lobby, and entryway.
2. Door closers and door hooks must be installed.
3. Towel dispensers must be lowered.
4. All pipes under accessible restroom sinks must be insulated.
5. Flush controls moved to the “open” side.
6. Modification of the restrooms to address inadequate maneuvering space.

**Location 8: 105 East 106<sup>th</sup> Street, New York, NY 10029 - Emergency Operations Division**

WMC Associates, Inc. owns and manages this building, which operates 7 days a week. This location is not open to the public. HPD leases a portion of the 4th floor and the entire 5th floor, both of which can be accessed by elevator. This assessment included the areas leased by HPD, the building entrance, and restrooms. Although most areas comply with accessibility standards, the following issues were identified.

For the purpose of this report, the restrooms are labeled as follows:

1. Men's Restroom 4A
2. Women's Restroom 4A
3. Men's Restroom 4B
4. Women's Restroom 4B
5. ADA Accessible Restroom 4

6. Men's Restroom 5A
7. Women's Restroom 5B
8. ADA Accessible Restroom 5

**Access Issues:**

1. Lack of ADA signage on the floors.
2. While both ADA restrooms meet the ADA accessible requirements, Men's Restroom 4A, Women's Restroom 4A, and Men's Restroom 4B do not contain an ADA stall and lack proper signage informing someone of the location of the ADA restroom.
3. There is only a side grab rail.
4. Coat hook is 60 inches from the floor.

**Corrective Actions to be managed by General Services at 105 East 106<sup>th</sup> Street:**

1. ADA signage will be placed on the restrooms and entry way doors/hallway.
2. Installation of grab bar in all accessible stalls
3. Coat hook in accessible stalls will be lowered.

**B. Workplace Inclusion – Implementation Span: 2024-2028**

This report assesses the current state of workplace accessibility at HPD with a specific focus on recruitment, pre-employment, onboarding, retention, and fire and life safety.

**Recruitment, pre-employment, and onboarding**

The study indicated that HPD has actively pursued the recruitment and employment of people with disabilities. HPD additionally maintains a 55-a Coordinator responsible for managing the 55-a Program. Notably, all electronic job postings and employment opportunities at HPD are designed to be accessible for people who use assistive technology.

Moreover, HPD conducts structured interviews of candidates, offering a variety of platforms such as in-person interviews or virtual interviews via platforms like Teams or Zoom. In another initiative, HPD collaborates with the Department of

Social Services to onboard interns from The Partnership for Inclusive Internships program.

### **Retention**

HPD is committed to fostering workplace retention through inclusion and has actively pursued this goal. Upon joining the organization, all new employees participate in New Hire Orientation during their first few weeks. During this orientation, employees familiarize themselves with the agency's culture, various divisions, and have the opportunity to meet and engage with representatives from the EEO/ODEI office. This interaction allows employees in need of reasonable accommodations to connect with the office.

The EEO/ODEI office adheres to DCAS procedural guidelines and provides reasonable accommodations to employees who request them. The office offers multiple channels for employees and members of the public to communicate and discuss their accommodation requests, including email, phone, virtual meetings via platforms like Teams or Zoom, and in-person meetings.

HPD actively encourages all employees to participate in agency social and recreational activities and accessible training programs. These activities are designed to be inclusive and open to all employees. Trainings are offered virtually and in-person, as well as in synchronous and asynchronous learning formats to increase accessibility for all employees.

Throughout their employment, HPD provides employees with valuable tools and resources, including computer-based training. Hiring Managers are mandated to complete DCAS training on structured interviewing, and all employees are encouraged to take the DCAS training on implicit bias. These initiatives aim to promote a more inclusive and informed work environment.

### **Effective Communication through Auxiliary Aids and Services**

HPD is dedicated to fostering effective communication with people with disabilities, maintaining policies that support employees, interns, and visitors in need of auxiliary aids and services. The agency ensures a successful communication environment by engaging in a cooperative dialogue to understand the specific needs and preferences of people with communication disabilities. This includes accommodating reasonable requests for accommodation through the EEO/ODEI office. In cases where securing a request poses undue hardship,

alternative accommodations are explored. Once approved, the ODI/EEO staff oversees the procurement of necessary auxiliary aids and services.

To further facilitate communication, HPD offers American Sign Language (ASL) interpreters both in person and remotely, as well as assistive listening devices at the Division of Tenant and Owner Resources offices and 7<sup>th</sup> floor conference room located at 100 Gold Street. Moreover, the agency provides resources for people with vision disabilities, such as documents in braille and large print for both staff and the public.

### **Fire and Life Safety**

HPD has established contingency plans to ensure the safety of people with disabilities during fire emergencies and other life-threatening situations. In case of a fire or emergency, there are visible fire alarms in place, specifically designed to enable people with disabilities to alert emergency personnel or receive alerts themselves. These alarms feature pull levers that can be easily operated with just one hand, eliminating the need for tight grasping, pinching, or wrist twisting. Additionally, these alarms provide both visual and audible alerts to ensure that people with disabilities can access critical safety information. The emergency plan was developed in collaboration with the Department of Citywide Administrative Services (DCAS). All Fire Wardens and Searchers have received training on how to respond in the event of a fire or other emergency, specifically with regard to the needs of staff and other people with disabilities and functional impairments. The most recent training session took place on September 28, 2023.

### **Actions to Promote Workplace Inclusion**

HPD has made significant progress in promoting workplace inclusion and has identified additional steps it will take to foster inclusion of people with disabilities.

1. To increase participation in job recruitment events by people with disabilities, HPD will collaborate with MOPD to participate in at least one recruitment event annually that is tailored to people with disabilities. This will be monitored by ODEI/EEO.
2. HPD offers documents and forms compatible with assistive technology and ASL interpreter services. HPD will seek to streamline its procurement processes to reduce the required lead time for the assistive technology and interpreter services to 24 hours. This will be monitored by ODEI/EEO.

3. HPD has participated in The Partnership for Inclusive Internships program, a public-private partnership to foster diversity and inclusive hiring in NYC and NYS governments. To enhance the number of internships offered by HPD to people with disabilities, EEO/ODEI will collaborate with HPD Divisions to identify potential opportunities and secure additional internships. This will be monitored by the EEO/ODEI department.
4. HPD does not currently have an Employee Resource Group (ERG) dedicated to people with disabilities. The EEO/ODEI Office will explore employee interest in establishing a disability-based ERG with a primary focus on fostering inclusion. The EEO/ODEI office will assist and liaise with this ERG.
5. HPD promotes employee participation in promotional exams. Employees in the 55-a Program will be actively encouraged to seek promotional opportunities.

### **C. Effective Communication – Implementation Span: 2024-2028**

Effective communication is the bedrock of meaningful interaction for everyone, regardless of their abilities. Yet, for people with disabilities, it becomes even more critical. HPD extends its services to clients in person as well as through a digital format across all five boroughs. By deploying a range of communication strategies, such as accessible formats, adapting to diverse needs, and nurturing a supportive environment, people with disabilities can access information and fully utilize all services and benefits offered by HPD.

While HPD already implements mechanisms like providing documents in large fonts or braille and utilizing screen readers, additional training will be conducted by the ODEI/EEO division to respond to the following specific challenges:

- Understating and using [plain language](#) when necessary.
- Ensuring staff are equipped to arrange for auxiliary aids and services.
- Familiarizing staff with the locations of all assistive listening systems.
- Educating staff on the use and significance of plain language to enhance communication clarity.



This training will empower HPD staff to better address the needs of people with disabilities, ensuring they have equitable access to information and services.

## **D. Digital Access – Implementation Span: 2024-2028**

The main purpose of this section is to examine the existing status of digital accessibility at HPD with the goal of ensuring that people with disabilities have equal access to HPD's web platform and social media, so that they can enjoy the same services as those without disabilities. As a service-oriented agency, HPD extensively uses web-based programs, mobile applications, social media, instructional videos, and its website to interact with the public. Internally, virtual meetings, electronic document creation and usage, and computer-based trainings are also integral to HPD's operations.

### **Digital Access**

HPD employees responsible for creating digital content are aware of laws and standards relating to digital accessibility relevant to the content they create. HPD has two Digital Inclusion Officers (DIOs) who are the main point of contact on digital accessibility issues. The DIO's have developed their own in-house Design System that covers various Accessibility Requirements such as WCAG 2.1, WebAIM Introduction to Web Accessibility, The A11y Project Checklist and Colorblind Web Page Filter. In addition, training was previously provided to staff from MOPD's former Digital Accessibility Coordinator. Currently, MOPD's Digital Accessibility Coordinator assists in testing and reviewing agency websites such as Housing Connect and the Lead Exemption Online Portal (LEOP).

### **Websites**

HPD is working with MOPD to meet W3C's Web Content Accessibility Guidelines 2.1 Level AA.

### **Social Media**

HPD ensures extensive accessibility measures on their social media. HPD's Digital Media Specialist adds Closed Captioning (CC) or embedded captions to all videos, detailing significant background sounds and identifying speakers, avoiding auto-generated captions. Additionally, they incorporate audio descriptions within the original or as a separate linked version in descriptions/posts. To enhance inclusivity, their posts refrain from ASCII text and provide purposeful, descriptive alternative text for images, conveying their information and intent.

## **Access Issues/Corrective Actions**

HPD identified the following access issues during review of its website accessibility and will make the following changes to achieve greater digital accessibility:

1. Create a review process to verify that digital products and services purchased are accessible and usable by people with disabilities.
2. Meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal and public facing websites.

## **E. Programmatic Access – Implementation Span: 2024-2028**

HPD’s Division of Tenant and Owner Resources, located at 100 Gold Street, and staff at HPD Borough Service Centers meet with members of the public Monday through Friday. The survey we conducted identified the following accessibility issues:

- All offices require the installation of an induction loop assistive listening system.
- Cashier counters at the following Borough Service Centers need to be lowered to an accessible height:
  - 701 Euclid Avenue
  - 94 Old Broadway
  - 1932 Arthur Avenue

## **F. Additional Initiatives Implementation Span: 2024-2028**

### **Agency Response to Feedback**

The Agency reviewed and analyzed feedback from both external stakeholders and internal sources to identify areas for improvement. In response, HPD has identified the following areas that require attention and are committed to addressing them.

- Fire and Life Safety at 100 Gold Street:

HPD has received internal feedback concerning the Public Address System, specifically the issue of inaudible alerts and the absence of emergency lighting in certain areas. Staff members are urged to report such issues to General

Services, which will then coordinate with DCAS for necessary follow-up actions.

- Digital Access:

HPD has received both internal and external feedback highlighting the necessity for captioning services on meeting platforms like Zoom and Microsoft Teams. Although these applications already support captioning, we will include instructions in meeting invites to guide participants on how to enable this feature.

## **Housing for People with Disabilities**

People with disabilities encounter distinct challenges in their pursuit of affordable, safe, and accessible housing. HPD has dedicated efforts to enhance the availability and quality of affordable and accessible housing units, including those designed to provide necessary support for residents with disabilities. The primary aim is to eliminate barriers preventing individuals from accessing suitable housing and to support those with disabilities in maintaining their residences. Listed below is an overview of various programs and initiatives implemented by HPD in the realm of housing for people with disabilities:

- “Set Aside” Units for People with Disabilities:

In numerous affordable housing projects overseen by HPD and HDC, 7% of all affordable units are designated for applicants with disabilities. Within this allocation, 5% of the units are reserved for applicants with mobility disabilities, and 2% of units are reserved for people with vision and hearing disabilities. Since 2014, a total of 5,170 newly constructed units have been made available to people with disabilities due to the implementation of this set aside requirement.

- Housing Ambassadors Program:

The Housing Ambassadors Program, initiated by HPD, collaborates with community-based service providers in New York City to assist individuals with preparing and applying for affordable housing lotteries through Housing Connect. The Housing Ambassador Program has expanded into a network comprising over 50 community-based service providers. Notably, some of these providers specialize in supporting the needs of people with disabilities in the housing application process. While people with disabilities are encouraged to

meet with any Housing Ambassador, they also have the option to choose a Housing Ambassador dedicated to serving the disability community.

- The Affordable Housing Guide for People with Disabilities:

The Affordable Housing Guide for People with Disabilities offers comprehensive details on applying for affordable housing and is available in PDF, MS Word, and American Sign Language formats.

# Appendix

1. To review HPD's grievance policy, please click [here](#).
2. To report accessibility issues relating to Housing Connect, please click [here](#).
3. To review HPD's Website Accessibility Statement, please click [here](#).
4. DCAS has independently conducted physical access assessments for the following areas of City-owned Buildings:
  - a. Entry points
  - b. Building lobbies
  - c. Elevators
  - d. Shared corridors
  - e. Staircases
  - f. Communal restroom facilities
  - g. Exit routes.

To review the outcomes of these assessments, please refer to the DCAS Local Law 12 5-Year Accessibility Plan.

5. To review the 2010 ADA Standards for Accessible Design Guide, please click [here](#).
6. To review the City of New York's Digital Accessibility Report published in 2021 pursuant to Local Law 26,, please click [here](#).
7. To learn about DCAS's 55-a Program, please click [here](#)
8. To learn about HPD's Borough Service Centers, please click [here](#)
9. To review Web Content Accessibility Guidelines (WCAG), please click [here](#).
10. To access NYC Housing Connect, the City's portal to find and apply for available affordable housing opportunities in New York City, please click [here](#).

# Glossary

**Accessible Route:** A continuous and unobstructed path connecting all accessible elements and spaces within a building or within a site that can be negotiated by a person with a disability using a wheelchair, and that is also safe for and usable by persons with other disabilities. Exterior accessible routes may include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts. In comparison, the Pedestrian Access Route (PAR) is an accessible route within the public rights-of-way.

**Effective Communication:** This is a standard set by the ADA that requires state and local governments to ensure that communication with people who have communication disabilities is equally as effective as communication with people without disabilities. Effective communication is achieved through the use of alternate methods of communication that make information understandable for people who may have vision, hearing, and speech impairments.

**Reasonable Accommodation:** Adjustments or modifications provided by an employer to enable people with disabilities to enjoy equal employment opportunities. Accommodations vary depending upon the needs of the individual applicant or employee.

**Structured Interview:** A structured interview is when an interviewer uses the same predetermined list of questions with all job candidates.