



NYC Department of Social Services
NYC Human Resources Administration
Local Law 12 of 2023
5-Year Accessibility Plan (2024-2028)

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General

About the Department of Social Services

The Department of Social Services (DSS) is comprised of the administrative units of the NYC Human Resources Administration (HRA) and the Department of Homeless Services (DHS). Through integrated management for HRA and DHS, client services can be provided more seamlessly and effectively. The City leverages shared service functions across agencies, which results in better day-to-day management and facilitates an integrated mission across agencies.

<https://www.nyc.gov/site/hra/about/about-hra.page>

About the Human Resources Administration

The New York City Human Resources Administration/Department of Social Services (HRA/DSS) is dedicated to fighting poverty and income inequality by providing New Yorkers in need with essential benefits such as cash, food, medical, housing and emergency assistance.

As the largest local social services agency in the country, HRA helps more than three million New Yorkers annually through the administration of more than 15 major public assistance programs, with more than 12,000 employees and an operating budget of \$11.45 billion.

Introduction: The 5-Year Accessibility Plan

Local Law 12 of 2023 requires every New York City agency to develop and implement a five-year accessibility plan, in consultation with the Mayor's Office for People with Disabilities (MOPD). The legislation mandates that the accessibility plans outline the steps agencies are taking to "ensure that the agency's workplace, services, programs and activities are accessible to and accommodating and inclusive of persons with disabilities" by improving physical, digital, and programmatic access, and providing effective communications for persons with disabilities.

The NYC DSS (HRA & DHS) is fully committed to an inclusive and equitable environment for people with disabilities, whether they be our clients or our workforce.

Per Local Law 27 of 2016, each City Agency must designate a Disability Service Facilitator (DSF). The designated DSF for DSS/HRA/DHS is in the DSS Office of Disability Affairs as part of the Office of Advocacy. This Office is also responsible for preparing and updating this 5-Year Accessibility Plan. Information on filing grievances

regarding discrimination based on disability as well as the Agency's website accessibility statement are located on the webpage indicated below. The DSF contact information is as follows:

Office of Disability Affairs (ODA)

Jennifer Shaoul
Executive Director of Disability Affairs / Disability Service Facilitator
Human Resources Administration
150 Greenwich Street – 42nd Floor
New York, NY 10007
Fax: 917-639-0442
Email: disabilityaffairs@dss.nyc.gov

Or you can call 718-557-1399.

[Disability Access - HRA \(nyc.gov\)](http://nyc.gov/disability-access)

Executive Summary

The landmark settlement in *Lovely H. v. Eggleston*, 05-cv-6920, which was approved by the court on June 22, 2015, affirmed HRA's strong commitment to serving clients with disabilities to ensure meaningful access to its benefits and services. Consistent with the requirements in the settlement, the Agency now maintains robust processes to serve clients with disabilities. This includes: a process for clients to request and obtain reasonable accommodations; disability screening protocols to proactively assess reasonable accommodation needs; conducting outreach prior to taking action to close a client's case; revising notices and other written materials most frequently provided to clients for readability and to include disability rights information and information on how to request a reasonable accommodation; creating a client services screen in agency systems that is available to staff across agency programs and includes information about reasonable accommodation and other special service needs; enabling effective, real-time communication for clients who are deaf or hard of hearing; and forming a disability advisory panel through which HRA can gather feedback from community organizations that serve clients with disabilities.

In addition to the above, HRA accomplished the following:

- Ensured that ACCESS HRA, an expansive virtual system for applying and maintaining HRA benefits, is screen-readable so that people with vision disabilities can apply for services online. In addition, the Agency reviews content on ACCESS HRA to ensure it is written in plain language to facilitate access for people with cognitive disabilities or other barriers to understanding complex written information. ACCESS HRA also allows people with other disabilities to conduct their business with HRA virtually, without having to come to a Center. Agencies that assist this community

can also monitor individual cases through the ACCESS HRA Provider Portal.

- Provided a means by which people who are deaf and who use videophones can contact HRA directly through ASL Direct, where an agent also using a videophone can communicate using American Sign Language (ASL), without the need for an interpreter. HRA has also implemented an *ASL Options Card: A Tool for Staff*, making it easier for our employees to communicate interpretation options and time frames to the people we serve.
- DSS co-founded The Partnership for Inclusive Internships (PII), a program that provides internships for people with disabilities in government, enabling them to obtain valuable work experience while providing a path to government employment.

There are several other important initiatives in process or planned, as outlined in this document. Please contact us at disabilityaffairs@dss.nyc.gov to provide feedback on this plan or to share other ideas that would enhance our ability to serve people with disabilities.

Agency Plan

Physical Access

All HRA public-facing facilities are accessible to people with disabilities with the exception of some temporary pop-up IDNYC locations. Information on accessibility of pop-up locations is available on the IDNYC locations page on the HRA website.

DSS works closely with DCAS and contractors to ensure accessibility. Several General Support Services (GSS) team members are licensed architects and have been trained on ADA and Local Law accessibility. For facilities that are not public-facing and pose accessibility issues for employees and where the issue cannot be ameliorated, a transfer may be initiated via the reasonable accommodation process.

Kiosks and PC Banks at HRA locations have been designed with accessible features. Where possible, GSS is adding single-occupancy accessible bathrooms.

Any clients that have an accessibility issue can make a complaint through the DSS OneNumber, the Office of Constituent Services (OCS) or through the Office of Disability Affairs (ODA). The complaints are sent to GSS for evaluation and a remediation plan is developed, if necessary. OCS staff route the issues that come to their attention via the OneNumber to GSS. An architect is sent to assess the situation and then devises a

strategy for remediation. ODA also reviews these disability-related complaints to evaluate where further guidance and intervention is necessary.

Regarding loop systems for people with hearing loss: 95 Evergreen has a built-in induction loop system. Other DSS/HRA sites have access to micro-loop systems that can be utilized for guests upon advanced request with the respective program area.

Action Items:

- There are currently 2 locations that have issues with the accessibility of door handles. Facilities Operations is in the process of remediating the situation.
 - Unit responsible: DSS: GSS
 - Timeframe: Year 1
- DSS is actively consolidating 3 client-facing facilities in Brooklyn into one, with completion in Year 2. This is a ground-up construction site and the architect on record has a consultant that reviews ADA-compliance.
 - Unit responsible: DSS: GSS
 - Timeline: Years 1- 2

Digital Access

Websites

The DSS Office of Communications and Marketing (OCM) is the team principally responsible for creating and maintaining digital content for DSS-HRA-DHS websites. Every member of OCM's Digital Communications team and two members of the OCM's Graphics team have received training from MOPD on creating and evaluating accessible digital content, and this team has implemented procedures for ensuring the accessibility of digital content under their purview. This includes email communications to the public, which are currently hosted on HubSpot, a platform that includes features supporting accessibility. OCM is also exploring developing these policies and procedures further, using NYC Department of Information Technology and Telecommunications/Office of Technology and Innovation's (DOITT/OTI) policies for external communications as a model.

The DSS websites are administered by DOITT/OTI and are thus subject to their accessibility requirements and annual audits. These audits include user testing by people with disabilities. Audits address the websites' compliance with the Web Content Accessibility Guidelines (WCAG). WCAG defines accessibility requirements for designers and developers and delineates three levels of conformance: Level A, Level AA, and Level AAA. DSS' digital content has been deemed partially compliant (WCAG

2.1 level AA) since some parts of the content do not fully conform to this accessibility standard.

The principal challenge DSS has in achieving full accessibility is the large number of documents, nearly 3,000, hosted on the website, which are developed and/or sourced from a large number of program areas and other government entities.

Action Items:

- ODA and OCM will collaborate on creating a policy with guidelines for program areas on creating accessible digital content for the website. This policy will address creating accessible documents, including ensuring any images have appropriate alt text implemented. ODA and OCM will offer subsequent trainings on this policy once implemented, as needed.
 - Units responsible: DSS: OCM, ODA
 - Timeframe: Years 1 and 2

- ODA and OCM will collaborate on creating a 3–5-year remediation plan for documents that were previously posted on the DSS, HRA, and DHS websites and are not fully accessible.
 - Units responsible: DSS: OCM, ODA
 - Timeframe: Years 3-5

Additionally, DSS is developing a method clients can use for requesting reasonable accommodations for HRA programs and services online. DSS plans on implementing this feature on the HRA website in 2027. Please also see the section on Programmatic Access.

Videos

All videos posted on the DSS, HRA, and DHS website, as well as social media, includes Closed Captioning. OCM adheres to color palettes for video graphics that ensure accessibility for people who are low vision. Some videos include audio descriptions under the videos, in the text of the webpage.

Action Items:

- OCM will inventory which pages do not have this feature and will implement this feature across Agency websites.
 - Unit responsible: OCM
 - Timeframe: 1-4 years

- OCM will identify videos that will remain on Agency websites long-term, to remediate by adding built-in audio descriptions and ASL. OCM will explore

options for engaging a vendor to add built-in audio descriptions and ASL to these videos.

- Unit responsible: OCM, Finance
- Timeframe: 1-5 years

Social media

OCM's Digital Communications team is responsible for content posted on Agency social media accounts. All social media content which includes images has appropriate alt text incorporated, and all such content avoids the use of ASCII text. All video content on social media includes Closed Captioning.

ACCESS HRA

The ACCESS HRA system is built using Cúram and Diona Self-Service commercial off-the-shelf (COTS) solutions. Cúram COTS Social Program Management application is accessible and adheres to Web Content Accessibility Guidelines (WCAG) 2.1 (Level A & AA), US Revised Section 508, and EN 301 549 V3.1.1 standards. Diona Self Service is ADA Compliant and integrates with accessibility features embedded in mobile operating systems such as Android TalkBack and iOS VoiceOver for people who are blind or low vision.

ACCESS HRA regularly evaluates the accessibility of its digital content by conducting self-evaluations using web accessibility tools and user testing. An accessibility tester will test elements on each page against WCAG guidelines to validate that ACCESS HRA screens meet standards established to make websites more accessible to users with disabilities. The primary tool used for Accessibility testing is JAWS (Job Access With Speech) screen reader software. The ACCESS HRA system is tested for JAWS compliance using a combination of the JAWS and Internet Explorer version supported on Cúram V7.

In addition to JAWS, the following tools are also used during Accessibility Testing:

- Inspect from Microsoft (<http://msdn.microsoft.com/en-us/library/dd318521.aspx>)
- OAA Accessibility Extension for Firefox (<https://addons.mozilla.org/en-us/firefox/addon/openajax-accessibility-exte/>)
- Firebug for Firefox (<http://getfirebug.com/>)
- Web Developer Toolbar for Firefox (<https://addons.mozilla.org/en-US/firefox/addon/web-developer/>)

Users of Access HRA who are having difficulty with accessibility can use the online "Contact Us" form or contact DSS Infoline or the Office of Disability Affairs. HRA Disability Advisory Panel members also report back any access issues. These issues

are addressed expeditiously by the DSS Office of Business Process Innovation (BPI) team.

Action Items:

- BPI will explore funding to develop a mechanism to allow documents to be uploaded directly to AHRA.
 - Unit responsible: BPI
 - Timeframe: 1-3 years

DSS OneNumber

The DSS OneNumber Interactive Voice Response (IVR) system offers various features to ensure accessibility standards for individuals with disabilities, as well as ease of use for individuals with low literacy or limited English proficiency. OneNumber enables direct dialog, allowing callers to navigate through the menu using their voice in specific languages if touchtone navigation is difficult.

The OneNumber includes a separate dial-in number for callers seeking reasonable accommodations, which lets them bypass general queues. The OneNumber also features universal phrases, which are a set of one or more words assigned to route callers directly to specific program menus or queues within the application, such as those for requesting reasonable accommodations. These universal phrases can be added or removed anywhere in the IVRS. Additionally, the system has broadcast messages that inform callers of system features like universal phrases while they are on hold.

Individuals who are deaf or hard of hearing and use a videophone can still reach DSS/HRA and communicate using American Sign Language (ASL) by calling the ASL Direct video telephone number.

Programmatic Access

Overview: Programmatic Access at HRA

HRA maintains robust processes to serve clients with disabilities. This includes: a process for clients to request and obtain reasonable accommodations; disability screening protocols to proactively assess reasonable accommodation needs; conducting outreach prior to taking action to close a client's case; revising the notices and other written materials that are most frequently provided to clients for readability, as well as adding disability rights information, such as information on how to request a reasonable accommodation; creating a client services screen in agency systems that is available to staff across agency programs and includes information about reasonable accommodations and other special service needs; enabling effective, real-time communication for clients who are deaf or hard of hearing; and forming a disability

advisory panel through which HRA can gather feedback from community organizations that serve clients with disabilities.

Program Examples:

Adult Protective Services (APS)

The Adult Protective Services Program (APS) is a state-mandated case management program and part of the NYC HRA's Office of Special Services. APS provides services to New Yorkers 18 years of age and older regardless of income who:

1. Have a mental or physical disability; and
2. Due to these conditions, they are unable to manage their own resources, carry out the activities of daily living, or protect themselves from abuse, neglect, exploitation or other hazardous situations without assistance from others and
3. Have no one available who is willing and able to assist them responsibly.

APS seeks to promptly resolve the risks faced by eligible clients by arranging for services and support that will enable these individuals to live independently and safely within their homes and communities.

For the most part, APS meetings take place in client homes or by other means of communication preferred by the client. APS uses the DSS ASL contract to provide ASL interpretation when needed.

Action Items:

- Adapt APS brochure in Large Print
 - Units Responsible: HRA: APS; DSS: Office of Refugee and Immigrant Affairs (ORIA) which manages the language access contracts
 - Timeframe: Year 1
- Explore Selective Certification for the hiring of APS Case Workers who are fluent in ASL.
 - Units Responsible: HRA: APS; DSS: HRS, ODA, ORIA

Homebase

Homebase providers are aware of and have access to the US Department of Health and Human Services (HSS) and ADA guidelines. Compliance language is included in their contracts.

The current network of Homebase providers (7 providers, 16 contracts, 26 sites) adhered to the below guidelines and practice expectations:

- Homebase providers are compliant with the Americans with Disabilities Act (ADA) standards of accessibility and, when needed, provide clients with

reasonable accommodations, such as scheduled appointments that reduce wait time, site access accommodations, and/or program participation accommodations. Homebase is compliant with New York City Human Rights Law and DSS policies regarding these special populations.

- Homebase providers have key facilities that are ADA accessible or have undertaken alternative measures in order to make program activities accessible to persons with disabilities.
- Homebase providers have the ability to provide transportation for staff and transportation support for clients, including for housing searches, outreach efforts, and diversion/move-in assistance.
- Homebase providers have staffing structure for flexible hours for example: early morning/late evening on select weekdays and/or some weekend hours.
- Homebase providers support clients getting to housing viewings and appointments.
- Homebase providers provide plans for in-person, virtual, printed and digital outreach strategies and modify as needed to meet the needs of the community.
- Homebase providers provide in-person and virtual service needs assessment, engage households in services by using appropriate case management and human service techniques to ensure program retention.

The same practice expectation is intentionally spelled out in the newly released (November 14, 2023) RFX for Homebase Homelessness Prevention Services – for FY25 to FY27 with a July 1, 2024 start date.

Additionally, Homebase providers also have signed agreements with DSS to access sign language interpretation services through the DSS contract.

Action Item:

- Homebase staff will participate in an adapted *Introduction to Disabilities* training and informational session offered by DSS Office of Disability Affairs
 - Units responsible: HRA: Homelessness Prevention Administration (HPA); DSS: ODA
 - Timeframe: Years 1 & 2

Customized Assistance Services (CAS)

Customized Assistance Services (CAS) helps HRA clients with health and/or mental health conditions reach their highest attainable level of functioning and self-sufficiency by providing comprehensive, integrated, individualized clinical and support services. CAS utilizes a clinical approach to determine best services for clients with medical/mental health or substance use disorders.

CAS programs work closely with all parts of DSS including the Family Independence Administration (FIA), HIV/AIDS Services Administration (HASA), and DHS. CAS

providers serve clients through outreach services, including wellness checks, workshops, supportive services, career coaching, supportive job search/interviews, placement, and retention services. During the pandemic CAS's Wellness, Comprehensive Assessment, Rehabilitation, and Employment (WeCARE) program implemented a voluntary engagement program, and a Laptop Loaner program, which assisted with connecting current employable Cash Assistance clients to the employment opportunities through in-person or virtual engagement services. Hybrid services have continued now as clients return to mandatory engagement.

CAS will continue to provide low-income individuals and families with health, mental health and/or substance use disorders with comprehensive assessment, referral, advocacy, and case management services. CAS will also continue to partner with our clients, community, and other government entities to assist people we serve in attaining their highest level of functioning. Our services are holistic and stigma-free to ensure a positive, client-centered experience.

Cash Assistance (CA)

FIA's Division of Job Support Services (DJSS) oversees seventeen (17) Benefits Access Centers and six (6) Service Centers serving special populations throughout all five boroughs of New York City. The primary goal of the DJSS is to help individuals apply for and maintain Cash Assistance and jointly Supplemental Nutrition Assistance, if eligible, and Medicaid (MA), as well as and other related benefits and services to reach their maximum level of self-sufficiency, as well as to address any emergencies such as preventing eviction or dislocation, prevent utility shut-offs or restore utility service, storage of personal belongings while in shelter or in temporary housing, and permanent housing related needs (moving, initial rent, security deposit, broker fees, furniture allowance/establishment of the home grant, referral for ongoing rent subsidies).

Recent activities that have allowed for increased access:

- Last year, FIA's Cash Assistance program moved to a universal model allowing clients to apply at any Benefits Access Center (BAC) regardless of zip code.
- Applications may also be completed and submitted online via ACCESS HRA.
- Beginning in April 2023, FIA permanently shifted to a call environment (CA on Demand) for applications and recertifications, where interviews are conducted primarily by phone. There is no need for clients to come to a BAC for these services.
- There are accessible service windows and kiosks at BAC sites. PC Banks have an accessible station.
- Clients can request a reasonable accommodation via the Office of Constituent Services before visiting a BAC or they may request one upon arrival at the BAC

for expedited service and other needs as appropriate. They can also request an accommodation if they cannot come to a BAC because of a disability.

Action Items:

- Expand CA on Demand for other services, allowing clients to access services without visiting a BAC
 - Responsible Units: HRA: FIA; DSS: BPI
 - Timeframe: Years 1-5
- DSS recently issued guidance, reminding staff of the reasonable accommodation process post-COVID. BAC staff will receive refresher training on providing reasonable accommodations.
 - Responsible Units: HRA: FIA; DSS: OPPT, ODA
 - Timeframe: Year 1

Supplemental Nutrition Assistance Program (SNAP)

Applicants and clients have the ability to apply for SNAP in-person and online at Access HRA. SNAP also has a SNAP on Demand call-in environment for interviews. Clients and applicants can apply for reasonable accommodations as stated above. Approved and Provisional reasonable accommodations are indicated on a Client Services Screen. Certain SNAP notices are available in Braille and large print. There is an established authorized representative process for applicants that can be utilized through Access HRA. SNAP works with many Community-Based Organizations (CBOs) and Neighborhood Food Pantries (NFPs) that provide SNAP application assistance and submit directly to HRA. Additionally, Benefits Data Trust (BDT) and Hunger Free America (HFA) take telephonic SNAP applications permitting clients to provide a telephonic signature. Required points of contact can *all* be accomplished remotely via internet/mail/fax and telephone. There is an accessible counter at all in-person Customer Service Information Counters (CSIC).

There are longer certification periods (i.e., less frequent administrative points of contact) for Supplemental Security Income (SSI) recipients & households that contain a person who is elderly or has a disability (some conditions apply) via the NYS Combined Application Project (NYSCAP) & Elderly Simplified Application Project (ESAP).

Action Items:

- See Effective Communication Section re: alternative formats.

Medical Assistance Program (MAP)

Medicaid community offices are accessible (see Physical Accessibility Section above).

Action Items:

- MAP already contracts with a vendor to produce Disabled, Aged, Blind renewals in Large Print. MAP will work on a plan to migrate the renewals to a system that will accommodate other alternative formats and Large Print in additional languages.
 - Units Responsible: HRA: MAP; DSS: ITS
 - Timeframe: Years 1-2
- Update Agency Reasonable Accommodation process to include Medicaid-specific reasonable accommodations.
 - Units Responsible: HRA: MAP; CAS; DSS: Information Technology Services (ITS), OCS, ODA, Office of Legal Affairs (OLA)
 - Timeframe: 1-3 years

Home Care Services Program (HCSP)

Besides the accessibility features mentioned in the other sections of this Plan, the Home Care Services Program (HCSP) is responsible for Community Alternative Systems Agency (CASA) service processing. The staff conduct both in-home and virtual video assessments. Consumers are to be assessed in their home environment as that is a factor in determining in-home care, therefore, applicants and recipients do not access HCSP offices for service assistance. All assessments virtual and in-person can include sign language interpretation services.

Action Items:

- As the State Department of Health (SDOH) continues to refine the role of MAXIMUS (the NY State Independent Assessor) and managed care plans in the provision of personal care, HCSP will adjust to meet the needs of the consumers that we assess including a potential expansion of ACCESS HRA to include CASA service information and Medicaid Long Term Care (MLTC) plan contact information.
 - Units responsible: HRA: HCSP; DSS: BPI
 - Timeframe: 1-5 years

Office of Child Support Services (OCSS)

OCSS has various client-facing offices throughout NYC within the Intake and Parent and Community Engagement Unit (P & CE) program areas. These buildings and ancillary facilities are ADA-compliant. Restrooms are equipped with wheelchair accessible stalls. Elevators are equipped with braille to indicate floor numbers for clients who have vision disabilities.

Clients who are unable to visit our Intake and P & CE Customer Service sites may request a phone interview or use the OCSS Mobile App to access OCSS services. The OCSS Mobile app allows parents to enroll in child support from their phones, make child support payments, scan and upload required documents, and submit a challenge or debt reduction form. The app supports text-to-speech capabilities. Interview appointments can be scheduled via telephone upon client request which allows for clients with disabilities to access service without traveling to the OCSS site.

OCSS client-facing forms can be provided in large print for clients with vision disabilities. Documents can be made available in braille through the Language Access Unit of the Office of Refugee and Immigrant Affairs. OCSS staff are available to read forms to clients who have vision or cognitive disabilities, at the client's request. Sign language services are available in-person or via VRI (see Effective Communication).

Action Items:

- OCSS will ensure that all client-facing staff have received *Introduction to Disabilities* training.
 - Units responsible: HRA: OCSS; DSS: ODA, Office of Policies, Procedures & Training (OPPT)
 - Timeframe: Years 1 & 2

Office of Constituent Services (OCS)

The Office of Constituent Services (OCS), which is part of DSS, is responsible for maintaining content about the availability of reasonable accommodations (RAs) for HRA clients and the steps they can follow to submit a reasonable accommodation request (RAR) via the following channels:

- OCS Knowledge Base: An online database that is available for use by DSS OneNumber staff when answering calls from clients.
- 311: The 311 **Disability Access** page can be viewed by individuals who visit the 311 portal. The same content is used by 311 customer care representatives when answering calls made to 311.

OCS provides programmatic access to HRA clients via the following methods:

- An ASL Direct staff member who communicates program information and case specific details with HRA clients via video phone.
- The OCS RAR Unit processes client submissions for an RA.

OCS offers a post-call survey to clients who call the DSS OneNumber to gauge their overall call experience.

Action Items:

- RARs are currently submitted via phone, mail, or email. To broaden accessibility, HRA will develop an online form that clients can use to submit an RAR. This form would transmit the client's request directly into the database OCS uses to process reasonable accommodation requests and will be made available via a link in ACCESS HRA and on the Agency's Disability Access Page of the HRA website.
 - Units responsible: DSS: BPI, OCS, ODA
 - Timeframe: Years 1-4

Fair Fares NYC (FFNYC)

HRA's Fair Fares NYC (FFNYC) program assists low-income New Yorkers manage their transportation costs by connecting eligible New York City residents to a 50% discount on NYC Transit subway and eligible bus fares, as well as Access-A-Ride Paratransit rides. The program has five locations in Benefit Access Centers throughout New York City (one in each borough) and one (1) Electronic Application Processing Unit (EAPU).

Applications are available online and do not require staff intervention or site visit.

Staff can assist clients in person at one of the designated BAC locations or over the phone.

If a person with a disability requests assistance because of a disability through Infoline or OCS (other than a mailed application), they are routed to ODA. ODA will work with the individual and the Program to find an appropriate accommodation.

HIV/AIDS Services Administration (HASA)

The HIV/AIDS Services Administration (HASA) is the primary mechanism within the Department of Social Services/HRA which expedites access to essential benefits and social services needed by persons living with HIV or AIDS and their families. HASA provides direct linkages to Cash Assistance, Medicaid, SNAP, Home Care, and Homemaking and on-going intensive case management.

HASA's mission is to work in collaboration with community partners to ensure that persons with HIV/AIDS have access to adequate housing, financial security, medical care, and other services necessary to allow them to manage the illness and to live their lives with the highest level of self-reliance and the fullest dignity. This also includes ensuring accessibility at the HASA centers. If for any reason a HASA client cannot access a HASA location because of a disability, arrangements can be made for a home visit by the case manager. Reasonable accommodations are available as in other HRA programs, e.g., sign language interpretation.

HASA's housing provider contracts include language requiring compliance with the ADA. The contracts also require an ADA compliance plan.

Domestic Violence Services (DVS)

DVS is the primary mechanism through which the City of New York provides emergency shelter and social services to victims of domestic violence and sexual assault. DVS oversees the largest network of domestic violence services in the country. These NYS-mandated shelter and community-based programs provide prevention and intervention services, crisis counseling, advocacy, and legal services to help families and individuals impacted by domestic violence. The programs administered by DVS include the Domestic Violence Shelter program, the Domestic Violence Hotline, the No Violence Again (NoVA) program, the Domestic Violence Liaison Unit (DVLU) and Anti-Domestic Violence Eligibility Needs Team (ADVENT). Non-Residential Domestic Violence Services, and Teen Relationship Abuse Prevention Program (RAPP).

Domestic Violence residential and non-residential providers were asked to create accessibility plans that detail compliance with regulations ensuring accessibility for individuals with disabilities, including the provision of reasonable accommodations at provider site location(s). Plans require information on providers' ongoing efforts to safely and effectively provide shelter to people experiencing domestic violence, as well as guarantee that those with disabilities have meaningful access to shelter and accompanying programs and services, as required by law. Guidance was provided on what a plan regarding accessibility and reasonable accommodations would include; it also served as an invitation to a continuing conversation, wherein DSS can share additional guidance as needed. DSS sought information regarding:

1. Accessibility of shared and individual spaces at your location(s)
2. Accommodation of service animals, therapy dogs, emotional support animals
3. Reasonable Accommodations (RAs) process
4. Providing accommodations for people with a range of disabilities
5. Training supporting staff in effectively working with people with disabilities
6. Complaint process—where clients are directed to place complaints in general, and if there is a separate complaint process if a client feels he or she has been treated unfairly or discriminated against because of a disability
7. Informing clients of their rights, how providers would process, track, and investigate complaints, and how providers inform clients of the results of a complaint investigation

Action Items:

- Continue to review submitted Provider Accessibility Plans and provide guidance for improvements.
 - Unit Responsible: HRA: DVS; DSS: ODA
 - Timeframe: 1-2 years

- Enhance the DVS Shelter Occupancy Residential Tracking System (SORTS) to expand demographic menu options to include written language in addition to spoken language and capture data on animals in shelter, including service and emotional support animals.
 - Units Responsible: HRA: DVS; DSS: ITS
 - Timeframe: 1-3 years

- A Request for Proposal (RFP) to replace 94 emergency DV shelter beds for residential services will ask proposers to clearly demonstrate their commitment to ADA compliance and provide detailed information on how they plan to meet accessibility needs of individuals with disabilities in the proposed units. In addition, 9 ADA units will be added to a DV Family Transitional shelter in Queens. Future RFPs will include the same provision.
 - Unit Responsible: HRA: DVS
 - Timeframe: 1-5 years

IDNYC

HRA oversees the IDNYC program. IDNYC is a free government-issued photo ID card for people aged 10 and older who live in NYC. It can help residents apply for City services, health insurance through the NYS Health Insurance Marketplace, and prove identity for employment, among other benefits.

All permanent sites are accessible. If pop-up sites are not physically accessible, it is indicated on the IDNYC website. Applications are available in large print and Braille. IDNYC utilizes hearing loops and has access to sign language interpretation at all sites, through Video Remote Interpretation (VRI).

Action Items:

- Purchase new homebound equipment in order to re-initiate homebound access post-COVID
 - Units responsible: HRA: IDNYC
 - Timeframe Years 3-5

Home Energy Assistance Program (HEAP)

HEAP benefits are issued to eligible New Yorkers to subsidize heating and cooling costs and provide financial assistance to repair or replace primary heating equipment

for homeowners. The HEAP application can be completed on ACCESS HRA. There are staff located in community offices and BAC offices to assist with application completion and submission. The BAC locations are accessible. Eligibility interviews can be done in person and over the telephone, as needed.

Supportive Programs and Initiatives/CBIC

The Electronic Benefit Office oversees the disbursement of Common Benefit Identification Cards (CBIC) to clients who have available benefits (CA, SNAP, and MA). The public over-the-counter site is currently located at 227 Schermerhorn Street in Brooklyn for the issuance of new and replacement CBICs.

CBIC Operations is located in an accessible space and has a designated waiting area for the clients who have a disability, medical condition or mental health condition and cannot wait on the line.

CBIC also works closely with Home Visit Needed/Reasonable Accommodation Request Benefits Access Center 90 (homebound/reasonable accommodations) with servicing Homebound clients.

Supportive Programs and Initiatives/Office of Burial Services (OBS)

The Office of Burial Services (OBS) provides support and, where eligible, financial assistance to survivors, next of kin, legally responsible relatives, friends or other designated entities of deceased indigent or unclaimed persons. OBS connects those who require information about the disposal of decedent remains through public burial or access to public burial to appropriate assistance through GSS. OBS handles determinations of financial responsibility regarding burial of NYC decedents who passed away in health facilities outside of the five boroughs. Local social service districts in neighboring counties submit requests for reimbursement for funeral costs regarding these determinations. The office location is accessible.

OBS staff also make designated appointments with applicants and clients who travel to the program via Access-a-Ride to ensure it is convenient for the client and provider. OBS accommodates clients with approved RAs. An RA may be requested on site as well.

OBS also allows applicants to complete the burial assistance process virtually by uploading the burial application and all supporting documents via the computer with a telephone interview to follow.

Office of Supportive/Affordable Housing & Services (OSAHS)

The mission of the Office of Supportive/Affordable Housing and Services (OSAHS) is to assist in the placement of homeless and unstably housed individuals and families into affordable permanent housing. We partner with community providers and other city agencies to connect New Yorkers to safe, stable, and healthy living environments, helping them to improve their quality of life. We believe everyone deserves a safe place to live and we are dedicated to creating and providing innovative and affordable housing solutions.

OSAHS is focused on assisting in the development and operation of permanent housing solutions for formally homeless individuals and families. OSAHS works closely with other divisions of HRA and with other governmental and non-governmental service providers to develop new housing programs and to refer households we serve so they can achieve their optimal functioning in a safe and supportive environment. In addition, we assist in placing thousands of households experiencing homelessness some with disabling conditions into supportive and affordable units each year.

OSAHS utilizes the Coordinated Assessment and Placement System (CAPS) to assist in the referral and placement of those households eligible for supportive housing. CAPS is a web-based system that is utilized by service providers to apply households for supportive housing and assist them in referral and placement process. CAPS is not a client-facing system. Any providers or agency staff who need accommodations to access this web-based system will be assisted by OSAHS.

Action Item:

- DSS is in the midst of developing systems so that people in the DHS system with reasonable accommodations for mobility and/or sensory disabilities are identified for potential supportive housing placements that have set-asides for these populations.
 - Units responsible: DSS: OSAHS, ODA, Office of the Chief Medical Officer; DHS: Rehousing Support Division
 - Timeframe: Years 1 and 2

Staff Training and Resources

All DSS/HRA/DHS employees receive a 4-hour *Introduction to Disabilities* training during New Employee Orientation that covers disability etiquette, appropriate language, the history of disabilities in the United States, the Americans with Disabilities Act, effective communication, and reasonable accommodations, among other topics. These trainings will continue.

Subsequent to the *Lovely H* stipulation of settlement, HRA current employees received a full-day *Introduction to Disabilities* training. That training will be modified to create a Part 2 Training for public-facing staff to supplement New Employee Orientation.

Action items:

- ODA will adapt the full-day training to create an *Introduction to Disabilities Part 2* training for public facing staff and supervisors that covers how to support and provide reasonable accommodations for people with mobility, sensory, mental health, cognitive, health and invisible disabilities, among other topics. The reasonable accommodation process will be covered at length.
 - Units responsible: DSS: ODA, OPPT; HRA: FIA
 - Timeline: Years 1-5

- Per the *Lovely H* Stipulation of Settlement, HRA will resume Supervisory Training: *Access for People with Disabilities – Ensuring Success through Supervision*
 - Units responsible: DSS: ODA, OPPT; HRA: FIA
 - Timeline: Years 1-5

ODA ADA Events, Lunch & Learns, the Disability Digest, Housing Resource Guide

The DSS Office of Disability Affairs has engaged in several projects to help DSS/HRA/DHS staff and our contracted provider agencies enhance their knowledge, skills, and resources in their service of people with disabilities. These projects have an added benefit of providing our staff with resources that potentially benefit themselves and their family members. These activities include:

- **ADA Anniversary Celebration Events:** Each year, ODA hosts events in honor of the passage of the Americans with Disabilities Act. These events provide our staff with access to resources and knowledge that will assist them in providing quality services to people with disabilities. ODA has also begun providing Excellence Awards to individuals and teams that provide exceptional service to people with disabilities. A sampling of Event topics:
 - **Homeward Bound: Housing Resources for People with Disabilities** (this also resulted in an accompanying manual on Housing Resources for People who Have Disabilities or are Aging that is currently made available to all staff)
 - **Aging with Dignity** (including a resource fair)
 - **A Roadmap to Mental Health for All**
 - **The Road to Inclusion: Championing People with Disabilities in the Workplace** (This segment included training for supervisors entitled *Creating a Mentally Healthy and Disability-Friendly Workplace*)
 - **The Changing Landscape of Accessibility: How to Be Inclusive in Our Digital World**
 - **Justice for All: Building an Accessible and Equitable Post-Pandemic Agency**

- **Tools for Transformation: An Adaptive Technology Expo** (Our most recent event that included both expert presentations AND hands-on technology demonstrations)
- **Monthly Lunch & Learns:** In 2023, ODA launched monthly Lunch & Learns, available to all DSS/HRA/DHS staff and staff of our contracted provider agencies. These hourlong presentations, hosted on Zoom, allow staff to learn in a remote session while enjoying their lunch hour, without taking time away from their busy jobs. Topics have included: Mental Health Crisis Services; Overview of the OPWDD Service System; an Animal Resource Forum; Resources for Individual who are Blind or Low Vision; the Medicaid Buy-In Program for Working People with Disabilities, and many more. ODA also collaborated with the Office of Equity and Inclusion on two additional Events: Neurodiversity in the Workplace and Signing Black in America.
- **Disability Digest:** Also in 2023, ODA launched the *Disability Digest* newsletter. Each issue includes a theme, e.g., transportation, recreation and the arts, and includes helpful policies, articles, programs and events related to the topic and disability. This newsletter is sent electronically to staff that provide more intensive services to the people we serve as well as staff that have attended our ADA Events, Lunch & Learns, as well as our DHS *Introduction to Disabilities* trainings.
- **Housing Resources for People Who are Aging or Have Disabilities: A Reference Guide** In 2018, ODA developed a guide to Subsidy and Placement programs for people who are aging or have disabilities. This Guide has been circulated widely in print and digital format and is referenced and distributed *during Introduction to Disabilities* training.

Action Items:

- Continue Annual ADA Celebration Events; Monthly Lunch & Learns; *Disability Digest* Newsletter
 - Unit Responsible: DSS: ODA
 - Timeline: Years 1-5

Effective Communication

General

Plain Language

In 2017 all Office of Procedures staff involved in the development, drafting, and revising of client facing material received training from MOPD on plain language. Staff were again trained by MOPD in 2019. Since then, Office of Procedures management has provided refreshers and reminders to previously trained staff as well as to anyone who has come on board after that on

the requirements of plain language and to use those techniques whenever revising or creating a client facing document.

After receiving the initial training, the Office of Procedures began an extensive project to review and update several hundred existing client facing forms in an effort to plain language them. This included lowering reading levels, increasing and standardizing font sizes (no less than 12pt font), and including a greater amount of white space leading overall to more readable notices being provided to clients. Additionally, Office of Procedures staff began incorporating these techniques in the development of all new forms and continue to apply them. Office of Procedures staff have also participated in several plain language reviews of text that will be displayed on client facing systems such as ACCESS HRA or provided on a telephonic interactive voice response system. The Office of Procedures has also created a new position, Director of Technical Graphic Design, with one of their duties being to assist the graphic artists under their supervision with ensuring plain language and accessibility are maintained or added in the revisions of existing material as well as the development of new material.

Effective Communications for People who are Deaf or Hard of Hearing

Provision of Sign Language Services

When DSS/HRA/DHS consolidated its administrative operations in 2017, the Office of Refugee and Immigrant Affairs (ORIA) began managing the Agency's sign language interpretation contract, streamlining services to better support the deaf and hard-of-hearing community. Sign language services were no longer viewed solely as a reasonable accommodation request, but also considered a language service.

Our Agency requires that contracted providers offer a full suite of language services, including sign language services. DSS/HRA/DHS acknowledges that this is a heavy burden for non-profit partners. In order to take advantage of the Agency's larger purchasing power, the Agency has shared our contract for sign language services with many of our service providers. The Agency currently shares our sign language contract with 237 providers, including 165 at DHS and 72 at HRA.

ORIA continues to work diligently to ensure that all of our clients who use signed languages get the support that they need. ORIA has contracts to provide sign language interpretation through video remote interpretation (VRI) or in-person. They are able to procure certified deaf interpreters (CDIs) as well as Communication Access Realtime Translation (CART) services.

ASL Direct

People who are deaf and use American Sign Language (ASL) can contact DSS/HRA/DHS directly via videophone through OCS, which houses a Deaf & Hard of Hearing Information Specialist who uses ASL to answer questions regarding programs,

services and cases. Find out more about ASL Direct here: [ASL Services for HRA and DHS Clients \(nyc.gov\)](#)

Action Item:

- DSS will explore funding for an additional ASL Direct staff member.
 - Units responsible: DSS: OCS, ODA
 - Timeframe: Years 1-3

ASL Options Card: A Tool for Staff

DSS developed a tool available to staff that are communicating with people who are deaf who are requesting sign language interpretation. The card is a simple way of offering the interpretation options available, depending on the situation:

- In-person
- Video remote interpretation (VRI)
- Scheduling an appointment for a later date and time when a sign language interpreter will be made available.

The card also indicates the wait time for each option. An ASL video description of the card is available on our website: [ASL Services for HRA and DHS Clients \(nyc.gov\)](#)

HRA and DHS Provider agencies are permitted to use this card for communication purposes, regardless of whether they use the DSS ASL contract.

ASL Communicard

ODA is in the midst of developing a communication tool for shelter clients that will be called a Communicard. While the target audience for this tool are clients who are deaf or hard-of-hearing, it may also be utilized by non-English speakers or individuals with cognitive disabilities. The card will display an assortment of images depicting simple requests that clients may point to when they need assistance quickly. This will only be used for the most basic requests to avoid requiring the client to wait while the site obtains ASL interpretation services. ODA has already met with selected shelter staff and professionals who serve the deaf community for initial guidance on creating this tool.

Action Items:

- Develop a Communicard prototype to be tested through a series of focus groups with individuals who are deaf who reside in shelter as well as client-facing shelter staff who have a background in American Sign Language and/or frequently interact with this population. The card will also be tested with other professionals in the field who are deaf or hard-of-hearing, including staff from MOPD.
 - Units responsible: DSS: ODA, OCM
 - Timeframe: Year 1, with the goal of launching by Year 2.

ASL Mini-Course

In 2023, in collaboration with MOPD and DSS's ASL Direct Program, ODA offered a 4-week hourlong mini-course on the basics of ASL. Over 700 DSS/HRA/DHS employees and contracted provider agency staff requested to participate. Students were selected based on the value of the course to their day-to-day work and their ability to commit to the program. The course was very well-received, and a 6-week course was offered in 2024.

Action Items:

- Offer additional ASL Mini-Courses as staffing as time allows
 - Units responsible: DSS: ODA, OCS (with the assistance of MOPD)
 - Timeframe: Years 1-5

Sorenson Communications Providing Free Video Phones to DHS Clients

Sorenson Communications has developed a program to provide free iPod Touches for use as video phones, to be given to individuals residing in shelter who are deaf or hard-of-hearing and who do not currently have a device for this purpose. This program is meant to facilitate individuals in shelter having video phones despite lacking a residence address, which is usually required for video phone users for registering with the Federal Communications Commission (FCC). DSS ODA has partnered with Sorenson Communications to identify individuals in shelter who are deaf and eligible for this program and connects these individuals with the team at Sorenson on an ongoing basis.

Providing Clear Masks to DHS, HRA, and Provider Staff to Facilitate Communication with Individuals who are Deaf or Hard-of-Hearing

During the COVID-19 pandemic, and with the assistance of MOPD, ODA began providing clear masks to DHS, HRA and provider sites who have clients who are deaf or hard-of-hearing. This is meant to ensure staff can access appropriate personal protective equipment (PPE) that facilitates communication if a client is deaf or hard-of-hearing. ODA provides clear masks to shelter and program staff members who attend our *Introduction to Disabilities* training course in-person (as well as mail them out to sites who request additional materials).

Effective Communication for People with Vision Disabilities

Alternative Formats: Completed Accessibility Efforts for Notices

- **Implementation of the Disability Accommodation Indicator:** In the NYC WMS (Welfare Management System), two fields for Disability Accommodation Indicators (DAI) have been created; one at the household level and one at the individual level. The DAI of the individual designated as the payee or casehead, if any, will be used. There is no limit to the number of individuals that can have a DAI code on a case, i.e., every individual can have a different DAI code.

The field values include:

- V1-Large Print (18 pt.)
- V2-Audio CD
- V3-Data CD
- V4-Braille

The DAI allows NYC HRA to track the overall number of clients who need documents in alternative formats and provides client specific information about each clients' preferred format.

- **Screen Reader Technology in ACCESS HRA:** ACCESS HRA is an online benefits portal and mobile app for New York City residents. With ACCESS HRA, New York City residents can apply or recertify for many HRA benefits, submit documents for their application, manage their case, and much more. Applicants and recipients can also submit and keep track of documents using the NYC ACCESS HRA mobile app. With the exception of some client specific notices, ACCESS HRA is compliant with screen reader technology and can be used by clients who are blind or low vision and are in need of alternative formats to access their case information/ documents.
- **Individual Assistance:** HRA may assist clients on a case-by-case basis by offering an alternative accommodation that also meets an individual clients' needs.

Alternative Formats: Ongoing Accessibility Efforts

The existing HRA systems are not equipped to generate documents in the alternative formats for people who have the DAI indicator, though clients do receive some State notices in alternative formats. HRA will use an external vendor to convert the required documents to the alternative formats. HRA has taken a number of critical steps to set up an ongoing relationship with the document conversion vendor, including:

- **Notice Inventory:** Identify all HRA applications, communications and publications generated by different HRA systems that need to be converted to the alternative formats.
- **DAI Client Inventory:** Identify and maintain the HRA DAI client population that should receive documents in the new alternative formats.
- **Mapping DAI Clients with Notices Generated:** On a daily basis, HRA will map DAI client notices generated to ascertain the documents/inserts requiring conversion to the alternative formats.

Action Items:

- DSS has convened a work group to implement the purchase of conversion services to the alternative formats from an external vendor.
 - Units Responsible: DSS: ORIA, OLA, ITS, Finance, ODA
 - Timeline: 1-5

Notices in ACCESS HRA

DSS Office of Procedures will utilize the Director of Technical Graphic Design to assist with developing a plan to test generated sample notices for accessibility elements in the transfer from One Viewer to ACCESS HRA.

Action Items:

- Develop an accessibility testing plan for transfer of notices to Access HRA
 - Units responsible: DSS: OPPT, BPI, ODA, ITS
 - Timeline: 1-3 years
- ITS is migrating from the use of static .JPG and .TIFF images that cannot be read by current digital accessibility tools. ITS plans to eliminate TIF images of text in our client notices and migrate to a dynamic text database system that maintains client notice verbiage in 12 languages as required by law. As a result, the client notice mailing system will support digital accessibility tools when reviewing client notices during fair hearings or other DSS Operations. Staff will be informed that each embedded image must specify an “alt attribute” to serve as alt text that identifies the image and its purpose to ensure digital accessibility. Modifications to code will be done only during the normal maintenance cycle.
 - Units responsible: DSS: ITS
 - Timeline: 1-5 years
- Develop a Job Description for a Digital Inclusion Officer and explore potential funding sources
 - Units responsible: DSS: ITS, OPPT, OCM, ODA, Finance
 - Timeframe: Years 1-3

Workplace Inclusion

Recruitment

DSS has used the 55-a Program to hire people with disabilities for competitive positions more than any other City Agency and has hired and promoted people with disabilities at all levels, not just entry-level. 55-a employees are encouraged to take Civil Service Exams. Candidates can be interviewed in person or virtually. Structured interviews are used, where all candidates are asked the same questions. All new employees receive a

4-hour *Introduction to Disabilities* training (see Training Section). If employment/personnel notices are requested in alternative formats, HRA is able to provide them.

Action Items:

- Human Resources Solutions (HRS) will engage with MOPD to participate in Job Fairs for people with disabilities as well as develop a plan to post positions on the NYC:ATWORK job boards.
 - Units Responsible: DSS: HRS, ODA
 - Timeframe: Year 1
- HRS will adapt their interview and candidate confirmation letters and emails to include information on requesting accommodations.
 - Units responsible: DSS: HRS, Equal Employment Opportunity Office (EEO)
 - Timeframe: Year 1
- HRS, in collaboration with EEO, will create a policy directive for hiring managers to use as reference tool for arranging accommodations for an interview and for new hires.
 - Units responsible: DSS: HRS, EEO
 - Timeframe: Year 1
- The Office of Equity & Inclusion (OEI) is in the process of working with HRS to update the diversity recruitment resources and will include disability access in the Diversity Recruitment Plan
 - Meet with HRS to update the Diversity Recruitment Plan
 - Units responsible: DSS: OEI, HRS
 - Timeframe: Year 1

Partnership for Inclusive Internships (PII)

In 2016, DSS began a partnership with AHRC NYC, funded by The Taft Foundation, that promoted internships for people with disabilities in government. The Partnership for Inclusive Internships (PII) was so successful that it is now in several other City Agencies and has expanded to NYS government agencies based in NYC. Over 160 interns have completed the program, many who have subsequently obtained employment, many within our own Agency. It is currently funded through the New York Community Trust. The program has won local and statewide awards and been featured in both print and television media outlets. This program has also been utilized as a successful strategy to promote 55-a hiring at DSS, allowing qualified candidates with disabilities to apply for competitive positions in NYC government without having to take a civil service examination. PII internship vacancies are shared with a wide range of partner

organizations serving the disability community, including ACCES-VR (Adult Career and Continuing Education Services – Vocational Rehabilitation) and CUNY LEADS (City University of New York – Linking Employment, Academics Disability Services).

Action Items:

- Work with Talent NYC and AHRC NYC to ensure continued funding for the PII Program
 - Units Responsible: ODA, HRS
 - Timeframe: 1-5 years

Reasonable Accommodations for Staff

The agency follows the DCAS Reasonable Accommodation Procedural Guidelines. (DCAS is the Department of Citywide Administrative Services). Employees can request ergonomic office equipment and technology among other things requesting a reasonable accommodation. Employees can apply for an accommodation on the Agency's intranet or by contacting the EEO Office. This information is shared during *New Employee Orientation* and yearly as part of *Right to Know* training. The agency follows the collaborative dialogue process for reasonable accommodations. Employees are given the options to meet in person or via teams.

Action Items:

- EEO will work with ITS to develop a system to fast-track access to equipment and technology for accessibility.
 - Units responsible: DSS: EEO, ITS
 - Timeframe: Years 1 and 2
- As funding allows, ITS will upgrade the current version of Visual Studio (2020) to Visual Studio (2022 r:17.5) which has programmer accessibility tools to ensure digital accessibility of new and modified systems developed/supported by ITS to meet Digital Content Accessibility requirements.
 - Unit responsible: DSS: ITS
 - Timeframe: 1-5 years
- Absorb (training scheduling and management system) notice will be revised to ask: "Do you need a reasonable accommodation to attend this training?" with details regarding how to request an RA with a deadline.
 - Unit Responsible: DSS: OPPT, EEO
 - Timeframe: Year 1

Digital Access for DSS-HRA-DHS Staff

While procurement language requires that systems be accessible, the assessment and incorporation of digital content accessibility is currently not integrated into the existing Systems Development Life Cycle (SLDC) at ITS. ITS will begin formulating processes within the various ITS groups to meet these requirements.

Digital Accessibility as validated by the ITS Quality Assurance (QA) Testing Group can be included in the ITS Systems Development Life Cycle and subsequently reviewed by bi-weekly ITS Change Advisory Board (CAB) Approval Process. The CAB (initiated 2017) ensures that all pre-implementation tasks (network infrastructure, development, testing, roll back) are complete before any system is migrated to the DSS Network or at NYC.GOV. Client-facing systems will be included.

Legacy staff-facing databases and websites do not all conform to W3C's web content accessibility guidelines. As replacement systems are developed, ITS will adhere to WCAG requirements.

Camtasia training videos, as created by the ITS Staff Development Training Group, include voice over and captions.

Action Items:

- The ITS QA Testing Group will seek funding for 1-2 full time Digital Accessibility staff to test all new and modified systems to ensure that ITS Systems comply with Digital Accessibility requirements. In addition, upon migration to the testing environment, pre-production applications will be subject to unit and regression testing by QA Testing staff before systems are signed off and moved to production on the DSS Network or at NYC.GOV.
 - Units responsible: DSS: ITS
 - Timeframe: 1-5 years
- ITS will ensure that digital accessibility requirements are consistently included in contracts awarded to service integrators/providers.
 - Units responsible: DSS: ITS
 - Timeframe: 1 year
- To ensure that digital content that is created by ITS for employees is accessible, ITS will work with ODA to make training on digital accessibility available.
 - Units responsible: DSS: ITS, ODA
 - Timeframe: 1-3 years

Other Activities

Other Training for Leadership

DSS currently conducts a yearly training entitled *Creating a Mentally Healthy and Disability-Friendly Workplace* for our Leadership Development Institute.

Action Item:

- DSS will offer this training 2-4 times a year for supervisory staff.
 - Units responsible: DSS: ODA, EEO, HRS, OPPT
 - Timeframe: Years 1 – 5

Office of Equity and Inclusion (OEI)

The Office of Equity and Inclusion (OEI) will continue to coordinate events around accessibility, awareness, and inclusion individually and in partnership with ODA.

Action Item:

- The Office of Equity and Inclusion is assisting interested staff in launching a Disability Employee Resource Group (ERG)
 - Units responsible: DSS: OEI
 - Timeframe: Year 1

Employee Events

All Employee Events take place in accessible facilities. Employees can request an accommodation if needed.

Action Item:

- OEI will include the following phrase in future communications about Agency events/activities: *If you need a reasonable accommodation to attend this event, please email equity@dss.nyc.gov by (date).* This communication will include accessibility symbols, as appropriate.
 - Unit Responsible: DSS: OEI
 - Timeframe: Year 1

Methodology

The 2015 *Lovely H. v. Eggleston* settlement resulted in a thorough review of HRA's systems for providing accommodations to people with disabilities and resulted in a

comprehensive overhaul of our systems and procedures, resulting in robust processes that promote meaningful access to people with disabilities.

In addition, ODA engaged in the following activities:

Self-Evaluations: ODA met with Agency Divisions and Programs reviewing Self-Evaluation Tools provided by MOPD and had follow-up sessions with liaisons to complete planning.

Review of Complaints: Besides the cases and complaints that ODA receives directly, ODA regularly reviews complaints and issues related to disability that are received by OCS. ODA responds to trends identified through these reviews, leading to remediation of access concerns, development of policies/procedures and edits to or additional training. These reviews informed the development of this Plan.

HRA Disability Advisory Panel: Since 2015, HRA has hosted a quarterly Disability Advisory Panel. Members include advocates with disabilities and representatives from agencies that regularly assist people with disabilities in obtaining and maintaining HRA benefits. The Panel was asked for recommendations and feedback regarding the development of this Plan for both HRA and DHS.

MOPD Monthly Community Calls: The DSS Executive Director of Disability Affairs regularly provides updates and receives feedback at MOPD's Monthly Community calls. She offered attendees an opportunity to participate in Focus Groups on Plan development and one Focus Group was held as a result of this offer.

Focus Groups at DHS Shelters: ODA conducted 3 focus groups with people with disabilities across shelter types, asking open-ended questions regarding their respective experiences with access and requesting suggestions for enhancing accessibility at DHS and at HRA.

WeCARE Disability Advisory Panel: As was done in previous years, ODA conducted a WeCARE Disability Advisory Panel session, engaging WeCARE participants from across the boroughs in a discussion regarding accessibility at HRA. WeCARE is programming for people who identify as having a disability that interferes with their ability to work. Services include a vocational rehabilitation track, a wellness track, and SSI track.

Focus Groups: The Office of Disability Affairs met with the Center for Independence of the Disabled in NY (CIDNY) Consumer Advisory Network and received feedback on both HRA and DHS services. ODA conducted another Focus Group organized by Coalition for the Homeless.

In addition:

This Plan was placed on the disability access page of the HRA website for comment. MOPD also posted the proposed plan and notice of opportunity to comment on the NYC Agency Accessibility Plans website and publicized the site via its e-mail list, social media channels and its quarterly community meetings in early January.

The proposed Plan was also shared internally with DSS/HRA/DHS employees who were offered an opportunity to comment.

The Agency considered all comments posted publicly or sent to the ODA mailbox and made edits and additions where possible.

Glossary of Acronyms

- **ACCES-VR** – Adult Career and Continuing Education Services – Vocational Rehabilitation
- **ADA** – Americans with Disabilities Act
- **ADVENT** – Anti-Domestic Violence Eligibility Needs Team
- **APS** – Adult Protective Services
- **ASCII** – American Standard Code for Information Interchange
- **ASL** – American Sign Language
- **BAC** – Benefits Access Center
- **BDT** – Benefits Data Trust
- **BPI** – Office of Business Process Innovation
- **CA** – Cash Assistance
- **CAB** – DSS ITS' Change Advisory Board
- **CAPS** – Coordinated Assessment and Placement System
- **CART** – Communication Access Realtime Translation
- **CAS** – Customized Assistance Services
- **CASA** – Community Alternative Systems Agency
- **CBIC** – Common Benefit Identification Cards
- **CBO** – Community-Based Organization
- **CDI** – Certified Deaf Interpreter
- **CIDNY** – Center for Independence of the Disabled in NY
- **COTS** – Commercial off-the-shelf
- **CSIC** – Customer Service Information Counters

- **CUNY LEADS** – City University of New York – Linking Employment, Academics Disability Services
- **DAI** – Disability Accommodation Indicators
- **DCAS** – Department of Citywide Administrative Services
- **DHS** – Department of Homeless Services
- **DJSS** – Division of Job Support Services
- **DOITT** – Department of Information Technology and Telecommunications
- **DSF** – Disability Service Facilitator
- **DSS** – Department of Social Services
- **DVLU** – Domestic Violence Liaison Unit
- **DVS** – Domestic Violence Services
- **EAPU** – Electronic Application Processing Unit
- **EEO** – Equal Employment Opportunity Office
- **ERG** – Employee Resource Group
- **ESAP** – Elderly Simplified Application Project
- **FCC** – Federal Communications Commission
- **FFNYC** – Fair Fares NYC
- **FIA** – Family Independence Administration
- **FY** – Fiscal Year
- **GSS** – General Support Services
- **HASA** – HIV/AIDS Services Administration
- **HCSP** – Home Care Services Program
- **HEAP** – Home Energy Assistance Program
- **HFA** – Hunger Free America
- **HHS** – U.S. Department of Health and Human Services
- **HPA** – Homelessness Prevention Administration
- **HRA** – Human Resources Administration
- **HRS** – Human Resources Solutions
- **ITC** – Information Technology and Communication
- **ITS** – Information Technology Services
- **IVR/IVRS** – Interactive Voice Response System
- **JAWS** – Job Access with Speech
- **MA** – Medicaid
- **MAP** – Medical Assistance Program

- **MH** – Mental health
- **MLTC** – Managed Long-Term Care
- **MOPD** – Mayor’s Office for People with Disabilities
- **NFP** – Neighborhood Food Programs
- **NoVA** – No Violence Again Program
- **NYSCAP** - New York State Combined Application Project
- **OAA** – Office of Accessibility and Accommodations
- **OBS** – Office of Burial Services
- **OCM** – DSS Office of Communications and Marketing
- **OCS** – DSS Office of Constituent Services
- **OCSS** – HRA Office of Child Support Services
- **ODA** – DSS Office of Disability Affairs
- **OEI** – DSS Office of Equity & Inclusion
- **OLA** – DSS Office of Legal Affairs
- **OPPT** – DSS Office of Policy, Procedures and Training
- **OPWDD** – Office for People with Developmental Disabilities
- **ORIA** – DSS Office of Refugee and Immigrant Affairs
- **OSAHS** – HRA Office of Supportive/Affordable Housing & Services
- **OTI** – Office of Technology and Innovation
- **P&CE** – Parent and Community Engagement Unit
- **PC Banks** – Personal Computer Banks
- **PII** – The Partnership for Inclusive Internships
- **PPE** – Personal Protective Equipment
- **QA** – Quality Assurance
- **RAPP** – Teen Relationship Abuse Prevention Program
- **RFP** – Request for Proposal
- **SDOH** – State Department of Health
- **SLDC** – Systems Development Life Cycle
- **SNAP** – Supplemental Nutrition Assistance Program
- **SORTS** – Shelter Occupancy Residential Tracking System
- **SSI** – Supplemental Security Income
- **VRI** – Video Remote Interpretation
- **WCAG** – Web Content Accessibility Guidelines
- **WeCARE** – Wellness, Comprehensive Assessment, Rehabilitation and Employment

- **WMS** – Welfare Management System