

NYC Commission on Human Rights

**Local Law 12 of 2023
Five-Year Accessibility Plan
(2024-2028)**

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Local Law 12 of 2023 Background

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 and workplace inclusion.

Statement of Commitment

The New York City Commission on Human Rights (“the Commission”) does not discriminate on the basis of disability in the operation of its programs, services or activities. Pursuant to the American with Disabilities Act and the New York State and New York City Human Rights Laws, people with disabilities are entitled to reasonable accommodations necessary to enable them to participate in programs, services, and activities.

The Commission will make reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Services are provided in a manner that respects the dignity and independence of people with disabilities;
- People with disabilities are given an opportunity to obtain Commission services and resources;
- Communicate in a manner that considers the person’s disability and preferred method of communication.

Mission of the Commission on Human Rights

The Commission is charged with the enforcement of the New York City Human Rights Law, Title 8 of the Administrative Code of the City of New York, and with educating the public and encouraging positive community relations. The Commission is divided into two major bureaus -- Law Enforcement and Community Relations:

- The Law Enforcement Bureau is responsible for the intake, investigation, and prosecution of complaints alleging violations of the Law.
- The Community Relations Bureau provides public education about the Human Rights Law and helps cultivate understanding and respect among the City's many diverse communities through its borough-based Community Service Centers and numerous educational and outreach programs.

The New York City Human Rights Law ("the Law") is one of the most comprehensive civil rights laws in the nation. The Law prohibits discrimination in employment, housing, and public accommodations based on race, color, religion/creed, age, national origin, immigration or citizenship status, gender (including sexual harassment), gender identity, sexual orientation, disability, pregnancy, marital status, height, weight, and partnership status.

In addition, the Law affords protections against discrimination in employment based on unemployment status; arrest or conviction record; credit history; caregiver status; status as a victim of domestic violence, stalking, and sex offenses; and sexual and reproductive health decisions. The Law provides protections in housing based on lawful occupation, family status, any lawful source of income, and status as a victim of domestic violence, stalking, and sex offenses. The New York City Human Rights Law also prohibits retaliation, discriminatory harassment, and bias-based profiling by law enforcement.

Project Equal Access and Disability Rights

The New York City Human Rights Law protects people with disabilities from discrimination at work, in their homes, and in public spaces. For decades, the Commission's Project Equal Access (PEA) has worked with housing providers, businesses, and employers to make New York City more accessible. Engaging collaboratively with these entities helps make spaces accessible to people with disabilities without the parties having to go through the formal complaint-filing process. This often results in much faster resolutions for people with disabilities. This effort is led by Project Equal Access (PEA).

When a person with disability contacts the Commission, a member of the PEA team consults with the person to gain an understanding of the situation. If the complainant has not made the request to their landlord or building manager, the PEA team member advises them to do so in writing. If the complainant has made the request and was denied the accommodation, PEA will conduct a physical survey to assess what accommodation is possible, using the guidelines of the Americans with Disabilities Act (ADA).

If PEA determines that an accommodation is possible, then PEA proceeds with contacting the landlord or building manager to advise them of their obligations under the New York City Human Rights Law, and to recommend the type of accommodation. PEA begins negotiating in good faith with the landlord to provide the accommodation.

If PEA determines that an accommodation is not possible, then PEA works with the landlord to find other options, such as a transferring the complainant to another building location that is accessible, moving the complainant to an accessible apartment or floor of the building, or other options.

PEA continues to work with the landlord until they satisfy the requirements of the reasonable accommodation. If this intervention is not successful, a complaint with the Law Enforcement Bureau may be appropriate.

Americans with Disability Act Notice of Rights

The Commission does not discriminate based on disability in the operation of its programs, services, or activities. Pursuant to the American with Disabilities Act and the New York State and New York City Human Rights Laws, individuals with disabilities are entitled to reasonable accommodations necessary to enable them to participate in programs, services, and activities.

Under Local Law 27 of 2016, every City agency is required to appoint a Disability Service Facilitator (“DSF”). People with disabilities needing an accommodation in order to participate in a program or receive a service at the Commission is invited to make their needs and preferences known by contacting the Commission’s Disability Service Facilitator (DSF): Anna Martinez, 22 Reade Street, NY, NY 10007, Phone: (212) 416-0112 or Email: armartinez@cchr.nyc.gov. For a scheduled Commission event, requests for reasonable accommodations should be made no later than 5 business days before the event so that staff can make the necessary accommodations. However, all Commission events open to the public are held in spaces physically accessible.

Commission employees seeking reasonable accommodations should contact the Commission’s Chief Equal Opportunity Officer, Medgine Sanon-Ellis, at

msanonellis@cchr.nyc.gov. A grievance regarding employment practices should be made in accordance with the City’s Equal Employment Opportunity Policy.

Candidates for employment at the Commission who seek a reasonable accommodation for the application process should contact the Commission staff supervising the application process.

Agency Plan

Physical Access (Implementation Timeframe: 2024-2028)

CCHR has leased office space/Community Service Centers (“CSC”) available to the public in all five boroughs of NYC:

- Central Office / Manhattan Community Service Center - 22 Reade St, 2nd Fl, NY, NY 10007
- Brooklyn Community Service Center - 25 Chapel St, Ste 100, Brooklyn, NY 11201
- Bronx Community Service Center - 1932 Arthur Ave, Rm 203A, Bronx, NY 10457
- Queens Community Service Center - 153-01 Jamaica Ave, 2nd Fl, Jamaica, NY 11432
- Staten Island Community Service Center - 60 Bay St, 7th Fl, Staten Island, NY 10301

The Commission's central office located at 22 Reade Street in Manhattan, where appointments with members of the public occur, has accessible elevators, accessible restrooms, automatic door openers, and signage.

Community Service Centers in the other boroughs have accessible entrances and accessible restrooms. When attending workshops and trainings at the CSC's, reasonable accommodations can be made by making the requests known when registering.

Physical access improvement planned:

- Removal of shelving unit to create a clear route of travel within the Staten Island CSC. Resources will be needed to achieve this.

The Commission operates out of the following buildings:

- City-owned building:
 - 22 Reade Street

- Leased spaces:
 - 25 Chapel St, Ste 100, Brooklyn, NY 11201
 - 1932 Arthur Ave, Rm 203A, Bronx, NY 10457
 - 153-01 Jamaica Ave, 2nd Fl, Jamaica, NY 11432
 - 60 Bay St, 7th Fl, Staten Island, NY 10301

The Department of Citywide Administrative Services (“DCAS”) is responsible for common areas in the City-owned buildings listed above. Agencies are responsible to assess common areas in the leased spaces listed and will work with landlords to address the findings of those assessments. The Commission is responsible for the agency demised areas (the offices themselves). Please see DCAS’s Five Year Accessibility plan for information on the public common areas of the city-owned buildings.

Digital Access (Implementation Timeframe: 2024-2028)

The Commission continues to improve the user experience and applies the relevant accessibility standards and follows the review process and procurement of digital products and services by following the NYC Office of Technology and Innovation (OTI) guidelines.

The Commission produces digital content through the website, social media, videos, virtual meetings, electronic documents and a learning module. Digital content is partially conformant with WCAG 2.1 level AA. Partially conformant means that some parts of the content do not fully conform to this accessibility standard. Staff that create digital content currently follow the OTI Guidelines and have also attended the Mayor’s Office for People with Disabilities (“MOPD”) in-person training.

During the self-evaluation process, the following issues were identified and will be addressed by the Commission’s Marketing and Information Technology teams:

- Videos and pictures on the Commission’s website and social media currently do not have American Sign Language (ASL) interpretation and/or audio descriptions built into the original videos, or a separate version. The Commission is committed

to implementing these requirements. Resources and funding are needed to achieve this goal.

- MOPD’s training on Accessible Documents will be scheduled for Commission staff to attend.

Programmatic Access

The Commission is committed to ensuring that people with disabilities have full access to our programs and services. People with disabilities needing an accommodation (ASL, CART, etc.) to participate in a program or receive a service is invited to make their needs and preferences known to the Commission by reaching out to the event contact as listed on event fliers or the Commission’s DSF. Requests must be made within five business days prior to the event date.

Commission events are held at locations that have accessible entrances, restrooms, and accessible seating. To confirm this before booking an event space, a physical site assessment is conducted by a member of the Project Equal Access team.

Review Process for New Programs or Changes to Existing Programs:

The Commission will implement a process so that accessibility and the impact on people with disabilities are considered when the agency launches a new program or initiative or makes a change to an existing program or service.

Effective Communications (Implementation Timeframe: 2024-2026)

Assistive technologies are available upon request by the public such as ASL, captioning services, and large print. These requests must be made known to Commission staff at least five days before an intake appointment, interview, meeting date or event, to allow for sufficient time to contact and schedule any necessary additional services.

Commission staff can also conduct intake appointments over the phone or through video conference for individuals who are unable to meet in-person. One conference room at the Central Office at 22 Reade Street in Manhattan is equipped with an Ampetronic hearing loop.

The Commission plans to implement a process so that all staff know how to respond to telephone calls made through a Telecommunications Relay Service (TRS). This will be implemented by the Commission's IT department.

Workplace Inclusion (Implementation Timeframe: 2024-2028)

The Commission participates in disability-inclusive recruitment events by providing information tables with Commission staff present to field questions. The Commission also posts electronic job openings through the NYC Jobs platform and on the NYC: ATWORK job boards. During the interview process, candidates are provided with the option for an in-person or virtual meeting.

The Commission provides tools, technology, workspaces, social and recreational events, and trainings that are accessible to all employees. Staff needing any disability-related accommodations are directed to contact the Commission's Equal Employment Opportunity Officer. In addition, at least every two years current staff must attend Disability Etiquette and Awareness trainings provided by MOPD and DCAS. Newly hired staff are also able to attend the Commission's Project Equal Access training as requested.

The Commission's Administrative and Human Resources departments will develop and implement the following:

- Pre-employment and on-boarding process documents and forms in accessible formats like large print and braille. Resources will be needed.
- Add language explaining how to request accommodations on all interview confirmations, letters, emails.
- Share job postings with State Vocation Rehabilitation agencies and organizations.
- Create employee resource groups.
- Create coaching opportunities and ensure that all employees have the information to be successful.

Methodology

The Commission developed its Five Year Accessibility Plan by evaluating steps the agency has taken and steps that agency plans to take to ensure compliance with administrative requirements under Title II of the ADA and local laws, by utilizing the Self Evaluation Templates provided by MOPD and Commission inter-departmental meetings. Meetings were held with leadership from the Law Enforcement Bureau, Community Relations Bureau, Information Technology, Marketing and Administrative Services to review checklists provided by MOPD.

The Five Year Accessibility Plan and Notice of Opportunity to Comment was posted on the Commission's website. In addition, MOPD posted the 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 meetings.

Appendix

Grievance Procedure Under the Americans with Disabilities Act by Members of the Public

A grievance pursuant to the Americans with Disabilities Act, the New York State Human Rights Law and/or the New York City Human Rights Law by members of the public should be made to the Commission's Disability Service Facilitator.

A grievance should be submitted in writing and include information including the name, address, and phone number of the aggrieved party, the location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request. The grievance should be submitted by the grievant or their designee as soon as possible but no later than 60 calendar days after the alleged violation.

Within 15 calendar days after receipt of the grievance, the Disability Service Facilitator or their designee will contact the grievant or their designee to discuss the grievance and the possible resolutions. Within 15 calendar days of the meeting, the Disability Service Facilitator or their designee will respond in writing, and where appropriate, in a format accessible to the grievant, such as large print, Braille, or audio tape. The response will explain the position of the Commission and offer options for resolution of the complaint.

nyc.gov/site/cchr/about/accommodations-notice.page

Website Accessibility Statement

The New York City Commission on Human Rights is committed to ensuring its digital content is accessible to and usable by people with disabilities. The Commission is continually improving the user experience and applying the relevant accessibility standards.

nyc.gov/site/cchr/about/website-accessibility-statement.page