

Landmarks Preservation Commission 5-Year Accessibility Plan (2024 – 2028)



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Background

Local Law 12 of 2023 (“Local Law 12”), codified as section 23-1004 of the NYC Administrative Code, requires agencies to prepare and publish 5-year accessibility plans using a template provided by the Mayor’s Office for People with Disabilities (MOPD).

The law requires agencies to develop and implement a 5-year Accessibility Plan that includes: 1) the steps the agency is taking over the next 5 years to ensure accessibility to the agency’s workplace, services, and programs, and, 2) information on ongoing projects and projects planned over the next 5 years related to improving physical, digital and programmatic access, and effective communications for persons with disabilities. These efforts include, but are not limited to, alterations or structural changes to facilities or premises that are owned and operated by the agency or contracted for use by the agency or otherwise under the agency’s jurisdiction; any planned upgrades or investments in technology or tools that will improve accessibility within the agency or access to such agency’s services and programs, and additional steps to make the agency’s programs and services more accessible to an inclusive of persons with disabilities.

General

Statement of Commitment

The New York City Landmarks Preservation Commission (“LPC”) believes in an equitable, diverse, and inclusive environment. LPC is committed to ensuring that persons with disabilities have access to the Commission’s services; to identifying, preventing and removing barriers to accessibility; and to meeting accessibility requirements in a manner that respects the dignity and independence of persons with disabilities. LPC strives to use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Receipt of complaints, investigations and other Commission services are provided in a manner that respects the dignity and independence of persons with disabilities to enable them to obtain, use or benefit from LPC’s resources and/or services;
- Persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from Commission resources and/or services;
- When communicating with a person with a disability, the Commission will do so in a manner that considers the person’s disability and preferred method of communication;

- Contingent on funding, the Commission will explore installation of assistive listening devices so that persons with disabilities may use assistive devices to support access to Commission resources and services; and
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.

Requests for Accommodations

Pursuant to Local Law 27 of 2016 (codified as NYC Administrative Code § 23-1002, the Landmarks Preservation Commission designated a Disability Service Facilitator (DSF), who coordinates agency efforts to comply with and implement LPC's responsibilities under the Americans with Disabilities Act (ADA) and other federal, state, and local laws and regulations regarding access to agency programs and services by persons with disabilities. Members of the public who need assistance accessing a particular program or service should contact LPC's DSF Stephanie Yang at (212) 602-7256 or access@lpc.nyc.gov.

For more information regarding LPC's accessibility statement and resources for persons with disabilities, please visit LPC's website <https://www.nyc.gov/site/lpc/about/website-accessibility-statement.page>

Accessibility Plan Updates

LPC's Operations Unit, in conjunction with the EEO Office and General Counsel, is responsible for preparing and updating LPC's Accessibility Plan.

Mission and Background

The Landmarks Preservation Commission is responsible for protecting New York City's architecturally, historically, and culturally significant buildings, sites, and districts by granting them landmark or historic district status and regulating them after designation. Buildings, sites, and districts are designated for their special character or special historical or aesthetic interest or value as part of the development, heritage or cultural characteristics of the city, state, or nation.

The agency is comprised of a panel of 11 commissioners who are appointed by the Mayor, with the advice and consent of the Council. Except for the Chair, the commissioners serve without compensation. The Commission is supported by a staff of approximately 80 preservationists, researchers, architects, historians, attorneys, archaeologists, and administrative employees.

There are more than 37,900 landmark properties in New York City, most of which are located in 156 historic districts and historic district extensions in all five boroughs. The

total number of protected sites also includes 1,459 individual landmarks, 121 interior landmarks, and 11 scenic landmarks.

In January 2021, LPC launched its Equity Framework which sets forth the agency's commitment to equity in all aspects of our work, including enhancing transparency and accessibility in the Commission's regulatory work, and prioritizing designations that represent New York City's diversity and designations in areas less represented by landmarks.

Executive Summary

LPC is committed to fostering an equitable and affirmative environment for both our workforce and the public whom we serve. To comply with the ADA and Local Law 12 of 2023, LPC undertook an assessment of its facilities and programs to identify priority areas to improve accessibility to LPC's services and empower its workforce to better serve New Yorkers. The proposed accessibility plan addresses access in the following areas: (1) Physical Access; (2) Digital Access; (3) Programmatic Access; (4) Communications; and (5) Workplace Inclusion.

The proposed accessibility plan is the result of the LPC's operations, legal and EEO departments working in collaboration to identify possible barriers to accessibility for persons with disabilities, develop reasonable protocols to remove barriers, and develop plans, timelines, and resources for implementation. Pending public comments on LPC's proposed accessibility plan, adjustments will be evaluated.

Agency Plan

In compliance with Local Law 12, the LPC has developed this first 5-year plan, describing the steps it is currently taking and will take over the next five years to ensure that its workplace, services, programs, and activities are accessible to and accommodating and inclusive of persons with disabilities. The plan covers the five areas identified in section (b)(2) of Local Law 12 (NYC Admin Code § 1004(b)(2):

- Physical Access
- Digital Access
- Programmatic Access
- Effective Communications
- Workplace Inclusion

Physical Access

Implementation Timeframe: 2024 – 2028

LPC operates out of the following buildings:

LPC Main Office: LPC currently operates out of 1 Centre Street, 9th Floor, New York, NY 10007.

1 Centre Street is city-owned and managed by the Department of Citywide Administrative Services (DCAS). DCAS is responsible for common areas and LPC is responsible for accessibility of its office and public areas. The public hearing space is fully accessible. Some office spaces may be modified to be fully accessible. As we are preparing for a move, there are moveable items, such as file boxes and small office furniture, temporarily stored against the walls in the hallways. The temporary storage of these items does not impact physical accessibility.

Please see DCAS's proposed plan for information on the common areas of the city-owned buildings.

At this time, the city is almost finished building out new offices for the LPC located at 253 Broadway. We anticipate moving in calendar year 2024. The new offices will be located on the 11th, 12th, and 13th floors, with a new public hearing room on the 2nd floor. The new space has been designed by DCAS to be compliant with accessibility codes for both members of the public and employees.

Contingent on funding, the Commission will explore installation of an assistive listening system in one conference room during the plan period.

NYC Archeological Repository: The Nan A. Rothschild Research Center: The LPC also operates the NYC Archeological Repository: The Nan A. Rothschild Research Center ("Repository"), a collection of the city's archeological collections, out of privately owned, donated basement space located at 114 West 47th Street. Archeological collections are properly cleaned, catalogued, and stored, and made available to members of the public. This space reachable by elevator.

Digital Access

Implementation Timeframe: 2024 – 2028

LPC will continue to strive to meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal- and public-facing websites.

- LPC's website is hosted by OTI, and LPC will work with OTI to meet Guidelines 2.1 Level AA.
- LPC has another internal and public facing website associated with the Repository: (<https://archaeology.cityofnewyork.us/>). This website is privately hosted and has been assessed for compliance with Guidelines 2.1 Level AA using WAVE, and some weaknesses have been identified. LPC is committed to striving to address these issues during the plan period depending on resources.

- LPC will ensure during the plan period that relevant employees involved in designing and posting digital content to public facing websites have received appropriate training in digital access.
- In compliance with Local Law 12 of 2023, LPC’s Web Accessibility Statement is posted on LPC’s Accessibility webpage
<https://www.nyc.gov/site/lpc/about/website-accessibility-statement.page>

Programmatic Access

Implementation Timeframe: 2024 – 2028

LPC offers fully electronic services to the public, homeowners and not-for-profit organizations who own landmarked property or structures in historic districts. All permitting applications and inquiries may be submitted online, and LPC’s website includes guides, rules and other regulatory information. LPC can accommodate reasonable requests for alternative formats (for example, large print) for most documents.

LPC is committed to providing employee training on the requirements of accessibility and has taken or will take the following steps to ensure employees are provided with the training needed to meet current standards and legislation:

- Provide educational or training resources in an accessible format that considers the accessibility needs of a person with a disability.
- Ensure new employees and volunteers complete Disability Etiquette and Awareness training within 30 days of employment or placement.
- Keep and maintain a database of the training participant’s names and dates of completion.

Effective Communications

Implementation Timeframe: 2024 – 2028

LPC is committed to providing accessible service to persons with disabilities and making our application process, informational guides, rules and regulations and other communications accessible to persons with disabilities.

- Upon request, LPC will provide or arrange for the provision of alternative formats and communication of LPC materials.

- Upon request, LPC will provide or arrange for alternative formats and communication supports for receiving and responding to feedback from persons with disabilities.
- LPC will continue to provide training to LPC staff on customer-centered approaches in their communications with persons with disabilities.

Workplace Inclusion

Implementation Timeframe: 2024 – 2028

Accessibility Policies

LPC is committed to fostering an affirmative and equitable employment program. The agency seeks to identify and remove barriers for employees with disabilities by periodically evaluating and reviewing recruitment and retention strategies. The agency:

- Has fully adopted and incorporated the Citywide EEO Policy and Reasonable Accommodation process into the LPC Employee Handbook. The LPC Employee Handbook is issued to employees upon hire, and available on a shared drive for reference.
- The EEO Policy and Reasonable Accommodations process is also e-mailed as an attachment to all staff at least once a year.
- Reviews internal policies on a regular basis and consistently integrates updates and/or amendments regarding accessibility to relevant local laws, rules and regulations into the Employee Handbook.

Accommodations: Recruitment, Hiring, and Onboarding

LPC has taken the following steps toward building an inclusive workforce:

- LPC posts vacancies on disability-inclusive job boards, including NYC ATWORK and ACCES-VR and plans to participate in disability-inclusive recruitment events based on the number of approved openings.
- LPC utilizes structured interviews to ensure all applicants are treated equally.
- LPC regularly reviews job postings to ensure inclusive language, and that job descriptions and qualification requirements are job related.
- All applicants who are selected for interview for a posted position are provided with contact information for the Disability Rights Coordinator, who will address any requests for an accommodation in a timely manner.
- Employees and applicants for positions at LPC are advised of the reasonable accommodation process.
- LPC's EEO Officer collaborates to support requests for accommodation at each part of the hiring process.

Documentation of Requests for Accommodations

Aligned with the Citywide EEO Policy and reasonable accommodation process, LPC's EEO Officer creates and maintains confidential documentation of requests for an accommodation. As a standard practice, EEO will:

- Engage in a cooperative dialogue with the requestor to ensure full understanding of the accommodation that is requested;
- Ensure timely review of supporting documentation;
- Maintain privacy and confidentiality;
- Seek to grant requests for accommodation if reasonable in terms of the LPC's provision of services as funding permits and as required by law;
- Provide a response in writing and/or in an alternative format upon request; and
- Advise requestor of the appeal process.

Training

LPC is committed to providing relevant training to employees to assess, identify and propose solutions to increase accessibility to the agency's facilities and resources. LPC will ensure, during the plan period, that employees receive the following training relevant to their position(s):

- Mandated EEO training, including Disability Awareness and Etiquette and Everybody Matters: EEO and Diversity/Inclusion for NYC Employees
- Sexual Harassment prevention (annual training)
- LgbTq: The Power of Inclusion training (biannual training)
- Structured Interviewing and Unconscious Bias
- Structured Interviewing: Utilizing Follow-up and Probing Questions
- Digital accessibility training
- Programmatic accessibility training.

Methodology

In addition to meeting ADA compliance requirements, LPC is committed to identifying ways to increase accessibility and inclusion. To this end, LPC is utilizing a 3-pronged approach as follows:

- Conducting self-evaluations as part of the development of this accessibility plan and committing to including accessibility in operational planning in the future, depending on budgetary circumstances.
- Requesting feedback from the public and subject matter experts and establishing a committee of operations, EEO, and legal staff to review such feedback.

- Convening periodic meetings to self-assess and evaluate existing conditions and implement reasonable and achievable plans for improvement.

Budget and Resource Allocation

LPC is one of the city's smallest agencies, with a modest operating budget that is almost entirely dedicated to Personnel Services ("PS"). While it has a very small Other Than Personnel Services ("OTPS") budget, LPC is committed to allocating money as funding permits for accessibility improvements during the plan period depending on future budgetary needs and circumstances.

Appendix A

Landmarks Preservation Commission Accessibility Webpage

LPC Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of the Landmarks Preservation Commission (“LPC”) to comply with all applicable laws including, but not limited to the Americans with Disabilities Act (“ADA”), Rehabilitation Act, the New York State Human Rights Law, and the New York City Human Rights Law. LPC does not discriminate on the basis of disability in the operation of its programs, services, and activities and strives to be welcoming to and inclusive of people with disabilities.

Employment related complaints for employees and applicants for employment seeking a reasonable accommodation are covered under the City’s EEO Policy which can be found at https://www.nyc.gov/assets/dcas/downloads/pdf/agencies/nyc_eeo_policy.pdf.

Any member of the public who requires an auxiliary aid or service for effective communication, or a reasonable modification of policies or procedures in order to participate in our programs, services or activities (involving matters other than employment) is invited to direct their needs and preferences to Stephanie Yang, LPC’s Disability Service Facilitator by email, phone or mail:

Stephanie Yang
Landmarks Preservation Commission
1 Centre Street, 9th Floor North
New York, NY 10007
(212) 602-7256
access@lpc.nyc.gov

Requests should be made as soon as possible but no later than three (3) business days before the scheduled program, service, or activity. Questions, concerns, or requests for additional information may be directed to the LPC’s Disability Service Facilitator.

If you believe that you have been denied an auxiliary aid or service or a reasonable modification of policies or procedures that you need in order to participate in programs, services or activities provided by LPC please see LPC’s grievance procedure below.

LPC Grievance Procedure for Members of the Public Alleging Discrimination Based on Disability

Any member of the public who alleging discrimination on the basis of disability in the provision of services, activities, programs or benefits by the Landmarks Preservation Commission (“LPC”) may file a grievance with LPC, which should contain:

1. The name, address, telephone number and/or email of the grievant, and
2. Information about the alleged discrimination and pertinent details with regards to the location, date, and description of the complaint or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law.

“**Grievance**” is the term for the allegation filed with DOI by a member of the public.

“**Grievant**” is the term for the person alleging discrimination in the grievance.

When and How to File a Grievance:

The written grievance should be submitted as soon as possible and within sixty (60) calendar days of the date of the alleged violation to:

LPC Disability Services Facilitator
Stephanie Yang
1 Centre Street, 9th Floor North
New York, NY 10007
(212) 602-7256
access@lpc.nyc.gov (include “Grievance” in subject line)

The grievance may be filed in one of two ways:

1. By submitting the grievance in writing by mail or email using the above address;
or
2. Upon request, by an alternative means, such as an in-person interview or an audio recording, describing the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human

Rights Law. A request for an alternative means of filing may be granted as an accommodation for a grievant with a disability.

Timeline Following Filing of Grievance

1. Within fifteen (15) calendar days after receipt of the grievance, the Disability Services Facilitator or their designee will discuss and document the grievance and any possible resolutions.
2. Within fifteen (15) days of this contact with the grievant, the Disability Services Facilitator or their designee will respond to the grievance in writing. Grievants may request the response in an additional format accessible to the grievant, such as large print, Braille, or audio recording. This response will address the grievance, describe the LPC's position and offer options for substantive resolution of the grievance, where applicable.

The resolution of any specific grievance will require consideration of varying circumstances, such as the specific nature of the disability; the nature of the access to the programs, services or facilities at issue and essential eligibility requirements for participation; the health and safety of others; and the degree to which an accommodation would constitute a fundamental alteration to the program, service, activity, or facility, or cause an undue hardship to LPC.

Appeals Process

The grievant or their designee may appeal the agency's decision within fifteen (15) calendar days after the receipt of the response by mail to:

Chair Sarah Carroll
NYC Landmarks Preservation Commission
1 Centre Street, 9th Floor
New York, NY 10007

The appeal should be submitted in writing using the above address. Alternative means of filing an appeal, such as an in-person interview or an audio recording describing the incident or alleged violation may be made available for grievants with disabilities upon request.

Timeline Following Filing of Appeal

LPC will respond to the grievant in writing within sixty (60) calendar days following receipt of the appeal. Grievants may request the response in an additional format accessible to them, such as large print, Braille, or audio recording. This response will address the appeal, describe LPC's decision, and offer options for substantive resolution of the appeal, where applicable.

All written grievances, appeals, and responses received in connection with a grievance made to LPC will be retained for at least three (3) years.

Note: Upon request to the Disability Service Facilitator, this page can be made available in an alternative format.

External Filing of Grievances

Grievants may also choose to file a grievance with the New York City Commission on Human Rights or the New York State Division of Human Rights.

1. New York City Commission on Human Rights
<https://www1.nyc.gov/site/cchr/enforcement/complaint-process.page>
2. New York State Division on Human Rights
<https://dhr.ny.gov/complaint#file>

LPC Website Accessibility Statement

The Landmarks Preservation Commission is committed to ensuring its digital content is accessible to and usable by people with disabilities. We are continually improving the user experience for everyone and applying the relevant accessibility standards.

Conformance Status

The Web Content Accessibility Guidelines (WCAG) define requirements for designers and developers to improve accessibility for people with disabilities. They define three levels of conformance: Level A, Level AA, and Level AAA. Our 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.

Feedback

We welcome your feedback on the accessibility of our digital content. Please let us know if you encounter accessibility issues by using the <https://www.nyc.gov/nyc-resources/website-accessibility-feedback-form.page>.

If you need assistance accessing a particular program or service, please reach out to Stephanie Yang, LPC Disability Services Facilitator at (212) 602-7256 or access@lpc.nyc.gov.

Assessment Approach

LPC assesses the accessibility of its digital content through self-evaluation.

Five-Year Accessibility Plan

Local Law 12 of 2023 requires agencies to develop and implement a five-year accessibility plan. Landmarks Preservation Commission's Proposed Five-Year Accessibility plan can be found below. See the Notice of Opportunity to Comment for information on how to comment on the proposed plan.

[Five-Year Accessibility Plan](#) (PDF)