



The New York City Police Pension Fund

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

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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 for persons with disabilities. These efforts include, but are not limited to: any 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 and inclusive of persons with disabilities.

Statement of Commitment

The New York City Police Pension Fund (“The Fund” or “PPF”) believes in an equitable, diverse, and inclusive environment. The PPF is committed to providing persons with disabilities with access to the Fund’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.

Consistent with the purpose of the legislation, the New York City Police Pension Fund strives to use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Active and retired members are provided with services in a manner that respects the dignity and independence of persons with disabilities to enable them to obtain, use or benefit from the Fund’s resources and/or services;
- Persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from Fund resources and/or services;
- When communicating with a person with a disability, the Fund will do so in a manner that considers the person’s disability and preferred method of communication;
- Planned installation of assistive listening devices so that persons with disabilities may use assistive devices to support access to Fund resources and services;
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law; and

- The Fund can make arrangements for home visits for those who may not be ambulatory.

Contact Information

The PPF's Office of the Chief of Staff is responsible for preparing and updating the Fund's Accessibility Plan.

Online Resources

The Fund's website contains useful information for individuals with disabilities, including:

1. Non-discrimination Policy and Notice of Rights
2. Grievance Procedures
3. Website Accessibility Statement
4. Five-Year Accessibility Plan

To access the Fund's online accessibility resources, please visit nyc.gov/content/nycppf/pages/accessibility. A copy of this webpage is appended to this plan as Appendix A.

Accommodations Requests

Under Local Law 27 of 2016, every City agency is required to appoint a Disability Service Facilitator ("DSF"). The DSF coordinates agency efforts to comply with and carry out the agency's responsibilities under the Americans with Disabilities Act ("ADA") and other federal, state, and local laws and regulations concerning access to agency programs and services by persons with disabilities. These individuals are liaisons to New Yorkers with disabilities, connecting people with disabilities to City government.

Employees and/or members of the public who need assistance accessing a particular program or service, should contact the Fund's DSF Sal Locascio at (212) 693-5100 or DL-DSF@nycppf.org.

Availability

The Fund's accessibility plan is publicly posted at nyc.gov/content/nycppf/pages/accessibility. Individuals may request a copy of this document in an accessible alternative format by contacting the DSF at DL-DSF@nycppf.org or (212) 693-5100.

Executive Summary

The Fund is committed to equity both in its workforce and in its service to its members. To comply with the ADA and Local Law 12 of 2023, the Fund has designed this accessibility plan to identify priority areas to remove barriers to accessing the Fund's services and to empower its workforce to better serve the members of the Fund.

This plan addresses access in the following areas:

1. Physical Access
2. Digital Access
3. Programmatic Access
4. Effective Communication
5. Workplace Inclusion

The purpose of this plan is to outline how the Fund will identify, remove, and prevent barriers for persons with disabilities and comply with the ADA and other legal requirements. This plan was formed in consultation with the Fund's EEO Office, which, through its role in answering disability-related inquiries and processing reasonable accommodations requests, has a strong understanding of past, present, and future accessibility issues. The Fund has developed this plan to address these issues, remove barriers, and prevent creation of new ones in the areas identified above. The Fund looks forward to members' comments on this plan and will work to achieve its goals by recognizing and addressing concerns from members of the Fund. While the Fund designed this plan to be comprehensive, a more thorough assessment will be required in some instances to identify effective long-term solutions and implementation strategies. As such, this plan will continue to evolve with the goal of achieving our accessibility objectives and keeping pace with changing accessibility standards and requirements.

Agency Plan

Physical Access

Implementation Timeframe: 2024-2028

The Fund's leased office space is located at 233 Broadway, New York, NY 10279, floors 19 and 25, which is designated as a landmark building. The Fund has begun implementation of several physical access improvements within its office space:

1. Accessible doors that automatically open and close.
 - The Fund will work with building management to install push button door access pads.
 - The Fund has made the waiting area ADA complaint.
2. Assistive listening systems.
 - The Fund plans to install an audio induction loop assistive listening system in one conference room.
3. Braille signage.
 - The Fund has already installed braille signage in all bathrooms.
 - The Fund plans to install additional braille signage in all common areas.

In addition to the above, the Fund will continue to establish plans to make its facilities more accessible. The Fund will take appropriate steps to prevent service disruptions to accessible parts of its public spaces. In the event of a service disruption, we will notify members of the service disruptions and alternatives available.

Digital Access

Implementation Timeframe: 2024-2028

The PPF will continue to strive to meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal and public facing websites. The PPF's Web Accessibility Statement is posted on [the Fund's Accessibility webpage](#) in compliance with Local Law 12.

Programmatic Access

Implementation timeframe: 2024-2028

Accessibility and inclusion of people with disabilities is a core value for the Fund. Training is provided in a way that best suits the duties and needs of employees. The Fund is also committed to providing training on the requirements of accessibility as they apply to people with disabilities.

The Fund has taken or will take the following steps to ensure employees are provided with the training needed to meet current standards and legislation:

1. Provide educational or training resources in an accessible format that considers the accessibility needs of a person with a disability.
2. Keep and maintain a database of the training participant's names and dates of completion.

Effective Communication

Implementation timeframe: 2024-2028

The Fund is committed to providing accessible services to people with disabilities and making our information and communications accessible to people with disabilities. The Fund is similarly committed to ensuring its digital content is accessible to and usable by people with disabilities.

To achieve greater digital accessibility and remove barriers to persons with disabilities, the Fund will:

1. Upon request, provide or arrange for the provision of accessible formats and communication support to persons with disabilities in a timely manner, taking into account the person's accessibility needs.
2. Provide, upon request, accessible formats and communication support for receiving and responding to feedback from persons with disabilities.
3. Offer training sessions offered by the Department of Citywide Administrative Services (DCAS).

Workplace Inclusion

Implementation Timeframe: 2024-2028

Accessibility Policies and Plans

The Fund will develop, implement, and maintain a five-year accessibility plan that outlines strategies and actions to identify, prevent and remove barriers for people with disabilities. Specifically:

1. The PPF has incorporated the Citywide EEO Policy into the Fund's Employee Handbook. The Fund's current policy requires all employees to read, review and sign the Employee Handbook, upon hire.
2. The PPF will review, assess, and amend, where necessary, its internal policies and procedures to incorporate accessibility equity into the Fund's core operations with respect to Fund employees and members of the Fund with whom PPF interacts.
3. The Fund reviews internal policies on a regular basis and will integrate updates and/or amendments regarding accessibility to relevant laws, rules, and regulations into the Employee Handbook. In conjunction with the commencement of its 5-year accessibility plan, the Fund plans to do an accessibility review of agency policies to ensure they address any accessibility issues.

Employment Standard and Reasonable Accommodations

The Fund is committed to ensuring our recruitment, assessment and on-boarding processes are fair and accessible to all applicants and potential employees' will also continue to provide reasonable accommodations to employees and applicants with disabilities.

The Fund has taken the following steps to ensure compliance with this standard:

1. Specifying that accommodation is available for employees and applicants with disabilities.
2. When making offers of employment, successful candidates are notified that accommodations are available upon request to the Fund's EEO Office.
3. The Fund arranges interviews, if applicable, for requested accommodation(s) in a timely manner, in a format/forum that is preferable to the employee requesting/requiring the accommodation.
4. The Fund informs employees of policies used to support employees with disabilities and notifies employees when there is a change in policy, as soon as practicable.

Documented Individual Accommodation Plans

Consistent with the Citywide EEO Policy and relevant laws and rules, the Fund's EEO Office shall produce and provide documented individual accommodations based on the following practices:

1. Cooperative dialogue with the employee or applicant requesting/requiring the accommodation;
2. External medical evaluations to determine appropriate and effective accommodations that address the specific disability or condition;
3. High level of privacy;
4. Regular review and updates, where applicable;
5. Reasons for denial, if applicable;
6. The means of providing the accommodation in a format that considers the needs of the employee;
7. If required, include individualized workplace emergency response information.

Return to Work

The Fund is committed to developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability. The Fund has developed and maintained a return-to-work process for our employees who have been absent from work due to a disability and require disability-related accommodations to return to work. The process includes the steps PPF EEO, Human Resources, and Facilities takes to facilitate the return-to-work process which utilizes the documented individual accommodation plans.

Performance Management, Career Development, and Redeployment

The Fund is committed to ensuring that the accessibility needs of employees with disabilities are considered with regard to performance management, career development and redeployment processes.

The Fund will review and update Human Resources policies and procedures taking the following elements into consideration:

1. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be considered when using performance management processes.
2. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be considered when providing career development and advancement opportunities.

3. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be considered when redeploying employees with disabilities.

Methodology

Beyond meeting ADA compliance requirements, the Fund is committed to identifying priorities to increase accessibility and inclusion. The Fund has identified the following goals to remove and prevent accessibility barriers over the coming years:

1. Review existing accessibility policies and procedures and update, where necessary.
2. Gather staff demographic data to determine the representation of people with disabilities and other diverse groups within PPF.
3. Increase employment and other opportunities for under-represented populations.

The Fund consulted with its EEO Office to identify the access issues described in this plan. The EEO Office, through the reasonable accommodations process, interacts with individuals with disabilities and has both a historical and a present understanding of disability-related inquiries and needs. This information was critical to informing PPF of the issues that should be addressed as part of this plan and will further serve as a guide for future amendments and additions to the plan. The PPF looks forward to members' comments concerning this plan and will work to achieve its goals by recognizing and addressing concerns from members of the Fund.

Appendix A - PPF Accessibility Webpage

The New York City Police Pension Fund Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of The NYC Police Pension Fund (“The Fund” and “PPF”) 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. The PPF 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 nyc.gov/assets/dcas/downloads/pdf/agencies/nyc_eeo_policy.pdf.

Any member of the Fund 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 the Fund’s Disability Service Facilitator by email, phone or mail:

Sal LoCascio
New York City Police Pension Fund
233 Broadway, 25th Floor
New York, NY 10279
(212) 693-5100
DL-DSF@nycppf.org

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 Fund’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 to participate in programs, services or activities provided by the Fund please see PPF’s grievance procedure below.

The New York City Police Pension Fund’s Grievance Procedure for Members of the Fund Alleging Discrimination Based on Disability

Any member of the Fund alleging discrimination on the basis of disability in the provision of services by PPF may file a grievance with the Fund, which should contain:

- the name, address, telephone number and/or email of the grievant; and
- information about the alleged discrimination, such as the location, date, and description of the incident 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 PPF by a member of the Fund.

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

Notice: The following grievance and grievance appeal procedures are for reporting of disability-based discrimination in the provision of services by the Fund only.

When and How to File a Grievance

The grievance should be submitted as soon as possible, but no later than sixty (60) calendar days after the date of the alleged violation to:

Sal LoCascio
New York City Police Pension Fund
233 Broadway, 25th Floor
New York, NY 10279
(212) 693-5100
DL-DSF@nycppf.org (Please 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

Within fifteen (15) calendar days after receipt of the grievance, the Disability Service Facilitator or designee will contact the grievant to discuss the grievance and possible resolutions.

Within fifteen (15) calendar days of this contact with the grievant, the Disability Service Facilitator or designee will provide a response in writing. Grievant may request the response in an additional format accessible to them, such as large print, Braille, or audio recording. This response will address the grievance, describe the Fund's position, and offer options for substantive resolution of the grievance, where applicable.

When and How to File an Appeal

The grievant may appeal PPF's decision within thirty (30) calendar days of receipt of the Fund's response. The appeal should be mailed to:

Kevin Holloran
Executive Director
New York City Police Pension Fund
233 Broadway, 25th Floor
New York, NY 10279
(212) 693-5100

The appeal may be filed in one of two ways:

1. By submitting the appeal in writing and by mail 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 Appeal

PPF's response to the appeal will be provided to the grievant in writing within sixty (60) 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 PPF's decision, and offer options for substantive resolution of the appeal, where applicable.

All written grievances, appeals, and responses in connection with a grievance made to

the Fund 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.

Website Accessibility Statement

The Fund 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. It defines 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 [Website Accessibility Feedback Form](#).

If you need assistance accessing a particular program or service, please reach out to the Fund's Disability Services Facilitator at (212) 693-5100 or DL-DSF@nycppf.org.

Assessment Approach

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

Appendix B – Proposed 5-Year Accessibility Plan Comments

The Fund developed a Five-Year Accessibility Plan in accordance with Local Law 12 of 2023. The Proposed Plan was posted for public comment from December 26, 2023 to February 16, 2024. The PPF's Proposed Plan received no comments.