

New York City Conflicts of Interest Board Local Law 12 of 2023 5-Year Accessibility Plan

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Introduction

Local Law 12 of 2023 (Local Law 12), codified as New York City Administrative Code § 23-1004, requires agencies to develop and implement a 5-year accessibility plan in consultation with the Mayor’s Office for People with Disabilities (“MOPD”) and post it on their website. The law states that the plan must include, at minimum:

- The steps the agency is currently taking and will be taking over the next five years to ensure that the agency’s workplace, services, programs, and activities are accessible to and accommodating and inclusive of persons with disabilities; and
- Information regarding the agency’s ongoing projects and programs planned over the next five years that are related to improving physical, digital, and programmatic access, and effective communications for persons with disabilities, including, but not limited to:
 - any alterations or structural changes to facilities or premises that are owned and operated by the agency, 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.

On June 17, 2024, COIB published on its website its Proposed 5-Year Accessibility Plan and an accompanying Notice of Opportunity to Comment. No comments were received in response.

General Information

Agency Mission and Background

The New York City Conflicts of Interest Board (“COIB”) is the independent City agency tasked with administering, enforcing, and interpreting the City’s conflicts of interest law (Chapter 68 of the New York City Charter), Annual Disclosure Law (Administrative Code § 12-110), Lobbyist Gift Law (Administrative Code § 3-224 to § 3-228), Affiliated Not-for-Profits Law (Administrative Code Chapter 9 of Title 3), and Legal Defense Trust Law (Administrative Code Chapter 11 of Title 3). In administering and enforcing these laws, the Board aims to “preserve the trust placed in the public servants of the City, to promote public confidence in government, to protect the integrity of government decision-making, and to enhance government efficiency.” Charter § 2600.

Agency Accessibility Statement

COIB is committed to complying with all applicable laws including, but not limited to, the Americans with Disabilities Act (“ADA”), the Rehabilitation Act, the New York State Human Rights Law and the New York City Human Rights Law. COIB 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.

COIB’s Accessibility Statement, which includes its Notice of Rights and Grievance Procedures and its Website Accessibility Statement, is attached as Appendix A and can be found at: <https://www.nyc.gov/site/coib/about/accessibility.page>.

Contact Information

Local Law 27 of 2016, codified as New York City Administrative Code § 23-1002, requires each City agency to designate a disability service facilitator (“DSF”) to coordinate its efforts to comply with 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. Individuals who need assistance accessing a particular program or service should contact COIB’s DSF, Christopher Hammer, at:

- **Address:** 2 Lafayette Street
Suite 1010
New York, New York 10007
- **Email:** hammer@coib.nyc.gov
- **Phone:** (212) 437-0721

Agency Plan

This Plan addresses the five areas identified in Administrative Code § 1004(b)(2):

- **Physical Access:** evaluation and enhancement of physical spaces for accessibility
- **Digital Access:** evaluation and enhancement of digital platforms for accessibility
- **Effective Communications:** implementation of accessible communication strategies
- **Programmatic Access:** adaptation of programs to accommodate diverse needs
- **Workplace Inclusion:** promotion of an inclusive work environment for COIB employees and applicants

Individuals may request a copy of this 5-Year Accessibility Plan in an alternative format that is accessible to them by contacting the DSF at (212) 437-0721 or hammer@coib.nyc.gov.

Physical Access

COIB's office is located in a City-owned building at 2 Lafayette Street, New York, New York 10007, managed by the New York City Department of Citywide Administrative Services ("DCAS"). COIB is assigned to a portion of the 10th floor as its office space. DCAS is responsible for common areas in the building, including common areas on the 10th floor, such as the restrooms, stairwells, and elevator landings. Unlike many City agencies, COIB does not typically provide on-site or in-person services to the public, and its offices are generally not open to the public.

COIB works with DCAS to ensure the accessibility of its office space. COIB Staff are regularly informed by the EEO Officer of their right to an accessible environment and how to request a reasonable accommodation. COIB's suite is accessible to individuals who use a wheelchair or other mobility device.

Accessibility Plan, 2024 to 2028

COIB has in the past alerted DCAS and MOPD to accessibility issues in the restroom located in the common area on the 10th floor, and DCAS has identified in its Local Law 12 5-Year Plan a project to upgrade the restroom on the 10th floor to be ADA compliant, anticipated to be completed between 2025 and 2027. Should COIB identify or be notified of any access issues in areas under the control of DCAS, COIB will promptly notify DCAS.

DCAS is planning a renovation of COIB office space in the next 3 to 5 years. COIB will work with DCAS to ensure that the office space complies with the ADA and all other accessibility laws.

Digital Access and Effective Communications

Website

COIB publishes written and multimedia materials on its website (<http://www.nyc.gov/ethics>), using the New York City Office of Technology and Innovation's ("OTI") TeamSite and following OTI's guidelines. To submit feedback on the accessibility of COIB's website, go to: <https://www.nyc.gov/nyc-resources/website-accessibility-feedback-form.page>.

COIB has conducted a self-assessment of its website using the Web Content Accessibility Guidelines ("WCAG"), which define requirements for designers and developers to improve accessibility for people with disabilities and identify three levels of conformance: Level A, Level AA, and Level AAA. COIB's website is partially conformant with WCAG 2.1 Level AA, which means that some parts of the content do not fully conform to this accessibility standard.

Virtual Presentations and Trainings

COIB conducts virtual presentations and trainings over Zoom, Microsoft Teams, or other platforms as requested by other City agencies. When conducting trainings at the request of other City agencies, COIB works as needed with those agencies to ensure that the trainings are accessible to all agency employees.

Accessibility Plan, 2024 to 2028

COIB is committed to ensuring its digital content is accessible to everyone. COIB has self-evaluated digital access and communications and has identified areas for improvement:

- COIB will explore training of appropriate staff on policies and best practices for digital accessibility, in particular to increase knowledge about digital accessibility among agency employees who produce digital content.
- COIB will explore training of appropriate staff on policies and best practices for making communication with individuals with disabilities more effective, including training as appropriate on the availability of auxiliary aids and services, etiquette around disabilities, and best practices for virtual presentations and meetings.
- COIB will work with MOPD to obtain feedback on digital content for accessibility.

Programmatic Access

Unlike many City agencies, COIB does not offer regular programming to the general public. COIB occasionally conducts open meetings and public hearings, which are held in external facilities that are accessible to individuals who use a wheelchair or other mobility device. All notices of open meetings and public hearings provide instructions on how to request additional accommodations for access. COIB is committed to ensuring that all open meetings and public hearings are accessible to the public.

COIB conducts in-person trainings at the request of and in facilities owned or leased by other City agencies. When conducting an in-person training, COIB staff assists the host City agency as needed to ensure that the training is accessible to all agency employees.

Accessibility Plan, 2024 to 2028

COIB is committed to ensuring that its programming is accessible to everyone. COIB will explore training of appropriate staff to understand all relevant laws, as well as best practices, to ensure accessibility for all.

Workplace Inclusion

COIB is committed to ensuring inclusion in its recruitment, assessment, and on-boarding processes. COIB's EEO Officer regularly notifies COIB Staff of their right to request reasonable accommodations and provides detailed instructions on the process to request reasonable accommodations or appeal the denial of an accommodation in accordance with the City's Reasonable Accommodation Procedural Guidelines. COIB will continue to provide reasonable accommodations to employees and applicants with disabilities.

Accessibility Plan, 2024 to 2028

COIB is committed to ensuring that its workplace is accessible for all employees and prospective employees. COIB has conducted a self-assessment of workplace inclusion practices and has identified the following areas of improvement:

- COIB has in the past been inconsistent in notifying potential applicants that accommodations are available if needed during the recruitment process. COIB commits to ensuring that this notice is included on COIB's recruitment website and available with every future job posting.
- COIB will explore training for appropriate staff on accessibility in recruitment, assessment, and on-boarding practices to ensure accessibility for all applicants.

Methodology

Beyond ensuring compliance with federal, state, and local laws, COIB is committed to reviewing its policies and practices and identifying priorities to strengthen accessibility and inclusion. COIB participated in Citywide Local Law 12 planning meetings and workshops organized by MOPD and consulted with MOPD staff during the planning process. The DSF also consulted with COIB staff in various units.

Appendix A: Accessibility Statement

Conflicts of Interest Board Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of the Conflicts of Interest Board (“COIB”) 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. COIB 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](#).

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 COIB’s Disability Service Facilitator by email, phone or mail:

Christopher Hammer, Deputy General Counsel
New York City Conflicts of Interest Board
2 Lafayette Street, Suite 1010
New York, New York 10007
hammer@coib.nyc.gov
(212) 437-0721

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 COIB’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 COIB please see COIB’s grievance procedure below.

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

Any member of the public alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by COIB may file a grievance with COIB, which should contain:

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- 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, NY State Human Rights Law, or NYC Human Rights Law.

“Grievance” is the term for the allegation filed with COIB 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 grievance should be submitted as soon as possible, but no later than sixty (60) calendar days after the date of the alleged violation to:

Christopher Hammer
New York City Conflicts of Interest Board
2 Lafayette Street, Suite 1010
New York, New York 10007
hammer@coib.nyc.gov (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, NY State Human Rights Law, or NYC 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. 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 grievance, describe COIB’s position, and offer options for substantive resolution of the grievance, where applicable.

When and How to File an Appeal

The grievant may appeal COIB’s decision within thirty (30) calendar days of receipt of COIB’s response.

The appeal should be mailed to:

Executive Director Carolyn Lisa Miller

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New York City Conflicts of Interest Board
2 Lafayette Street, Suite 1010
New York, New York 10007

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, NY State Human Rights Law, or NYC 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

COIB'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 COIB'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 COIB 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

COIB 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.

Assessment Approach

COIB's website uses the New York City Office of Technology and Innovation's TeamSite and follows OTI's guidelines. COIB assesses the accessibility of its digital content through self-evaluation.

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 COIB's Disability Services Facilitator at (212) 437-0721 or hammer@coib.nyc.gov.

Date

This statement was last updated on 10/10/2024.