

# NYC Law Department

# Local Law 12 Five-Year Accessibility Plan

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## **Agency Mission and Background**

Every day the New York City Law Department's approximately 850 lawyers and 750 support professionals work collaboratively to pursue justice while providing the City with the highest quality legal representation. The Law Department represents the City, the Mayor, other elected officials, and the City's many agencies in all affirmative and defensive civil litigation, as well as juvenile delinquency proceedings brought in Family Court and Administrative Code enforcement proceedings brought in Criminal Court.

Law Department attorneys draft and review local and State legislation, real estate leases, procurement contracts, and financial instruments for the sale of municipal bonds. The Law Department also provides legal counsel to City officials on a wide range of issues such as immigration, education, and environmental policy. There is rarely a major City initiative that is not molded by the Law Department's staff.

The Law Department is led by the **Corporation Counsel** who is nominated by the Mayor and subject to confirmation by the City Council. The office values a supportive work environment where dedicated public servants help each other develop the necessary skills to tackle complex legal issues. The office firmly believes that the diversity of its employees is its greatest strength. Many employees spend their career at the Law Department because they value the respect that their coworkers have for one another and the high standard of integrity and professionalism that their colleagues exercise.

## **Accessibility Statement**

The New York City Law Department is committed to providing an inclusive and accessible environment for all. We will strive to provide accessible services and facilities to all members of our community and will work towards this goal with dedication and passion. Everyone deserves equal access to our services and facilities. It is only by promoting accessibility that the Law Department will be able to uphold its core values: Justice, Diversity, Equity and Inclusion, Integrity, Excellence, Dedication, Respect, Teamwork, Supportive Work Environment, and Professional Development.

Consistent with these core values and with the purpose of Local Law 12 of 2023, the Law Department will use reasonable efforts to identify, prevent, and remove barriers to accessibility. The New York City Law Department is committed to providing physical, digital, and programmatic access, and effective communications to persons with disabilities. This five-year

accessibility plan outlines our efforts to improve accessibility in a manner that promotes equal access to our services and programs for persons with disabilities.

## **Executive Summary**

Local Law 12 of 2023 requires each New York City agency, in consultation with the Mayor's Office for People with Disabilities ("MOPD"), to develop and implement a five-year accessibility plan<sup>1</sup>.

Beginning May 1, 2025, and thereafter, each agency shall post an annual progress report detailing its achievements, from the prior fiscal year, with respect to the goals of the five-year accessibility plan. The progress report shall be posted to the agency's website and submitted to MOPD. Beginning May 1, 2027, and triennially thereafter, each agency shall post an updated five-year accessibility plan to its website and submit the updated plan to MOPD.

The New York City Law Department has developed a five-year accessibility plan as required by Local Law 12. The plan seeks to improve accessibility through the following:

- 1. Physical Access- As a result of our preliminary self-evaluation, we will initially seek to remove barriers to the Conference Room 2-160, which is used to host various programs. The Law Department will continue to evaluate services and facilities for ADA compliance and to improve accessibility for all members of our community.
- 2. Digital Access We will strive to meet website accessibility guidelines, improve compatibility of our digital content with assistive technologies and train employees.
- 3. Effective Communication We will strive to provide accessible documents, interpretation services, assistive listening devices, and captioning/transcription services.
- 4. Programmatic Access We will conduct self-evaluations, provide communication services and assistive technology as needed, and implement disability awareness training.

<sup>&</sup>lt;sup>1</sup> Local Law 12 of 2023, available at: https://intro.nyc/0682-2022

5. Workplace inclusion – We will continue to follow the City's reasonable accommodation and EEO policies.

This plan was developed as a result of a preliminary self-evaluation, conducted by a working group of Law Department employees, which identified several potential barriers. It is through these self-evaluations and the public comment process that the Law Department expects the five-year accessibility plan to evolve to better promote accessibility to our programs and services. We will continue to conduct regular self-evaluations in all areas required by Local Law 12.

## **General Information**

The New York City Law Department's Equal Employment Opportunity Office ("EEO") shall be responsible for preparing the New York City Law Department's five-year accessibility plan and providing annual progress reports. The EEO Office shall also review and prepare the triennial updates to the Law Department's accessibility plan.

## i. Requests for Accommodations and Disability Service Facilitator

The New York City Law Department 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, individuals with disabilities are entitled to request reasonable accommodations necessary to enable them to participate in programs, services, and activities. Such reasonable accommodation requests can be made for services or assistance not addressed in the fiveyear accessibility plan.

Anyone who needs a disability related accommodation to participate in a program or receive a service at the Law Department (involving matters other than employment) is invited to make their needs and preferences, with respect to accommodation, known to the Law Department by contacting the Law Department's Disability Service Facilitators ("DSF") listed below.

Leon Breeden Deputy Chief of Administration/Deputy EEO Officer 100 Church Street New York, NY 10007 212-356-1055 Ibreeden@law.nyc.gov Bijan Vafegh Assistant EEO Officer 100 Church Street New York, NY 10007 212-356-2602 **bijvafeg@law.nyc.gov** 

## ii. Grievance Procedure

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 Law Department's Disability Service Facilitators listed above.

To access the Law Department's grievance procedure, please visit: <u>https://www.nyc.gov/site/law/public-resources/americans-with-disability-act-notice-of-rights.page</u>.

A copy of the grievance procedure is appended to this five-year accessibility plan as **Appendix A**.

## iii. Website Accessibility

The New York City Law Department is committed to ensuring its digital content is accessible to and usable by people with disabilities. The Law Department is continually improving the user experience for everyone and applying the relevant accessibility standards.

To access the Law Department's Website Accessibility Statement, please visit: <u>https://www.nyc.gov/site/law/about/accessibility-statement.page</u>

A copy of the Law Department's website accessibility features is appended to this five-year accessibility plan as **Appendix B**.

## Agency Plan

The Law Department operates several offices managed by either the Department of Citywide Administrative Services ("DCAS") and/or various private companies. DCAS is responsible for the common areas in its managed buildings listed below. The New York City Law Department is responsible for the agency-occupied areas at all office locations.

### DCAS Managed Buildings:

#### **Manhattan Family Court Unit**

60 Lafayette Street New York, NY 10013

#### **Manhattan Family Court Unit**

100 Centre Street, 14<sup>th</sup> Floor Room 100 New York, NY

### **Brooklyn Family Court Intake Unit**

330 Jay Street, 12<sup>th</sup> Floor Brooklyn, NY 11201

### **Bronx Tort Unit**

Bronx County Courthouse 851 Grand Concourse, Room 901 Bronx, NY 10451

#### **Bronx Family Court Unit**

900 Sheridan Avenue Bronx, NY 10451

#### **Bronx Family Court Unit**

198 E. 161<sup>st</sup> Street, 3<sup>rd</sup> Floor Bronx, NY 10451

#### **Queens Tort Unit**

89-17 Sutphin Boulevard, 4<sup>th</sup> Floor Jamaica, NY 11435

#### **Staten Island Family Court Unit**

100 Richmond Terrace, Room B4 Staten Island, NY

### **Queens Family Court Unit**

151-20 Jamaica Avenue, 2<sup>nd</sup> Floor Jamaica, NY 11432

#### **Queens Family Court Intake**

120-55 Queens Blvd, Room 301 Kew Gardens, NY 11424 The Law Department occupies the leased spaces below and is responsible for analyzing accessibility in the agency-occupied areas. The Law Department may be responsible for assessing accessibility in the common areas of these leased spaces.

Leased Spaces:

Main Office – All Divisions Except Workers' Compensation 100 Church Street New York, NY 10007

### **Manhattan Family Court Unit**

52 Duane Street, 4<sup>th</sup> & 6<sup>th</sup> Floors New York, NY 10007

### **Manhattan Tort MBU & SLU Units**

233 Broadway, 5<sup>th</sup> Floor New York, NY 10007

### Brooklyn Tort Unit, Family Court Unit, and Workers' Compensation Division

350 Jay Street Brooklyn, NY 11201

### **Brooklyn Vertical Tort Unit**

1 Pierrepont Plaza, 10<sup>th</sup> Floor Brooklyn, NY 11201

### **Bronx Tort Unit**

260 E.  $161^{st}$  Street,  $3^{rd}$  &  $4^{th}$  Floors Bronx, NY 10451

## **Staten Island Tort & Family Court Units**

60 Bay Street, 4<sup>th</sup> Floor Staten Island, NY 10301

## Physical Access (Implementation timeframe 2024-2028)

The Law Department's main office is a leased space located at 100 Church Street, New York, New York 10007. As the City agency occupying the most space at 100 Church Street, the Law Department is responsible for evaluating the common areas. The Law Department occupies the second through sixth floors as well as a portion of the twentieth floor. The Law Department has implemented or will seek to improve physical accessibility in the common areas and its occupied spaces, including:

Common Areas of 100 Church Street

- 1. In the Fall of 2023, the Law Department worked with the lessor to have a push-button automatic door installed at the entrance of Church Street.
- 2. The Law Department will work with the lessor to explore accessibility regarding the reception/security desk located in the lobby of 100 Church Street, evaluating the reception/security desk for compliance with the Americans with Disabilities Act ("ADA").
- 3. In addition to the above, the Law Department will conduct selfevaluations at all office locations to identify barriers and improve physical access as set forth in the Local Law.

Law Department occupied spaces at 100 Church Street

- 4. In January 2022, automatic opening push-button doors were installed at the entrance door, located from the elevator lobbies into the office space, on each of the second through sixth floors.
- 5. In January 2023, an automatic opening door was installed in the reception area of the sixth floor.
- 6. In June of 2023, new flushometers were installed in the wheelchairaccessible bathrooms.
- 7. Conference Room 2-160 is a multipurpose room used for events, orientations, and classes. It is equipped with audiovisual equipment and furniture. There are three non-adjustable podium/lecterns with audiovisual controls in the room. The Law Department will explore plans to improve accessibility by adding an adjustable-height lectern with audiovisual controls. Conference Center at Room 2-160 is the primary venue for the agency's programming. The Law Department will further explore the improvement of accessibility in Room 2-160 for persons with disabilities, including the installation of additional automatic doors and directional signage, including signage accessible to persons with visual impairments.

- 8. The Law Department will analyze the accessible bathrooms and review for the installation of automatic soap dispensers and coat hooks in accessible stalls.
- The fourth-floor service desks/counters for Process and Courier Services, Document and Data Processing, and Duplication and Finishing Services will be evaluated for accessibility and modifications considered, where necessary.
- 10. The Law Department will evaluate the need for expanding accessibility on the Personnel, Payroll, and Timekeeping side of the fifth floor.
- 11. The fifth-floor cafeteria service counter will be analyzed for accessibility.
- 12. The sixth-floor reference desk in the law library will be evaluated for accessibility.

## **Digital Access (Implementation timeframe 2024-2028)**

The New York City Law Department is committed to ensuring its digital content is accessible to and usable by people with disabilities. Through selfevaluation, we are continually improving the user experience for everyone and applying the relevant accessibility standards, including:

- 1. **Website Accessibility**: The Law Department will strive to meet Web Content Accessibility Guidelines 2.1 Level AA for public-facing and internal websites.
- 2. **Digital Document Accessibility**: The Law Department will strive to make digital documents accessible and will provide accessible versions of documents upon request.
- 3. **Assistive Technology Compatibility**: The Law Department will review and analyze digital systems and platforms to improve compatibility with assistive technologies, including, screen readers, speech recognition software, and alternative input devices.
- 4. **Training and Awareness**: The Law Department will seek to train employees regarding best practices for digital accessibility and will explore designating an employee as the point of contact on digital accessibility issues.

5. **Feedback and Testing**: The Law Department will seek feedback from users with diverse disabilities to identify areas for improvement.

In addition to the above, the Law Department will continue to conduct selfevaluations of digital content to identify barriers and improve digital access as set forth in the Local Law.

## **Effective Communication (Implementation timeframe 2024-2028)**

To ensure effective communication in the Law Department's programs and services the following steps will be taken:

- 1. Accessible Documents and Forms The Law Department will strive to ensure that documents, presentations, reports, and handouts, are available in accessible formats, including but not limited to providing documents in large print, high contrast, electronic, or braille formats.
- 2. **Sign Language Interpretation**: When requested, the Law Department will provide sign language interpretation services, including having qualified interpreters available during meetings, presentations, and important discussions.
- 3. **Assistive Listening Devices**: When requested, provide assistive listening devices like personal amplifiers or audio induction loop systems. A list of assistive listening devices currently available at the Law Department can be found at MOPD's website at <a href="https://www.nyc.gov/site/mopd/laws/nyc-locations-with-assistive-listening-systems.page">https://www.nyc.gov/site/mopd/laws/nyc-locations-with-assistive-listening-systems.page</a>
- 4. **Captioning and Transcription Services**: When requested, offer real-time captioning or transcription services through live captioning services or by making transcripts available.
- 5. **Communication Access Realtime Translation (CART**): Provide CART services, via a trained provider, transcribing written text in real-time, when requested.
- 6. **Training for Staff**: The Law Department will seek to train employees on effective communication techniques when interacting with persons with diverse disabilities.

## **Programmatic Access (Implementation timeframe 2024-2028)**

The Law Department represents the City, the Mayor, other elected officials, and the City's many agencies in litigation as well as in juvenile delinquency proceedings brought in Family Court, and Administrative Code enforcement proceedings brought in Criminal Court. As the agency responsible for representing the City in litigation, the Law Department does not provide many public-facing programs and services in the same manner as other agencies. To ensure access to the Law Department's programs and services we will take the following general steps:

- 1. Accessibility Evaluation: The Law Department will evaluate physical spaces including offices, facilities, and meeting rooms to identify barriers and areas for improvement. Buildings, entrances, and interior spaces will be evaluated to ensure that they are accessible to persons with disabilities, especially when accessing programs and services.
- 2. **Communication Services**: The Law Department will seek to implement measures to ensure effective communication, including, providing sign language, or captioning and transcription services for programs, when requested.
- 3. **Assistive Technology**: The Law Department will work to provide appropriate assistive devices and equipment in meeting spaces and offices, including but not limited to, screen readers, assistive listening devices, text-to-speech software, or alternative input devices.
- 4. **Training and Awareness**: The Law Department will train employees on disability awareness, including on how to interact respectfully and effectively with persons with disabilities.
- 5. **Continuous Evaluation**: The Law Department will regularly selfevaluate the accessibility of offices, facilities, and meeting spaces and review feedback received.

The Professional and Organizational Development Unit provides programming to both Law Department employees and attorneys employed at other City agencies. The office hosts Continuing Legal Education ("CLE") Courses delivered by internal and external instructors. To ensure access to the Professional and Organization Development programs, the following steps will be taken:

- 1. **Requests for Accommodation**: Announcements, invitations, and reminders for CLE courses include notices that participants may submit requests for accommodation.
- 2. **Effective Communication**: The Professional and Organizational Development Unit takes the following steps to ensure effective communication during CLEs.
  - a. CLE participants are provided with course materials via electronic accessible PDF files prior to the class to allow for adjustment of the materials before the course.
  - b. The Conference Center at Room 2-160 is equipped with an assistive listening device which has been made available during CLE courses, when requested.
  - c. CLE programs are recorded, and the videos are hosted on CE Manager, which allows the programs to be viewed on-demand with captioning features enabled.
- 3. **Physical Accessibility**: During CLE courses the desks in Room 2-160 are spaced to allow access for persons using wheelchairs. As stated above, the Law Department will evaluate the physical route to Room 2-160 to identify and remove barriers. The Law Department will also evaluate the furniture and podium/lectern for ADA compliance.

In addition to the above, the Law Department will conduct self-evaluations of other programs and services to establish plans to improve programmatic access as set forth in the Local Law.

## **Workplace Inclusion (Implementation timeframe 2024-2028)**

The Law Department strictly adheres to the City of New York's EEO Policy and Reasonable Accommodation Procedure. The EEO Office makes considerable efforts to ensure that the process of reviewing reasonable accommodation requests is compliant with the EEO Policy as well as the applicable federal, state, and local laws. The Law Department takes the following steps:

1. The EEO Policy, Guidelines, and "Reasonable Accommodation and Complaint Processes at a Glance" infographics are posted on the agency's intranet site and distributed to staff bi-annually.

- 2. Employees receive training on the reasonable accommodation process, beginning with onboarding and intermittently throughout employment via communications, and refresher programs.
- 3. Supervisors receive additional training which reinforces their obligation to identify and report accommodation needs as soon as possible.
- 4. The EEO Office manages a dedicated electronic mailbox for reasonable accommodation requests and schedules cooperative dialogues in a timely and efficient manner.

To build a diverse workforce and create greater access to employment, the Law Department continues to utilize the 55-a Program to hire and retain qualified individuals with disabilities. The agency's strategies include the following:

- 1. All job postings and vacancies within competitive titles include language from the 55-a Citywide Coordinator indicating that titles are eligible for 55-a designation.
- 2. The 55-a Coordinator works with MOPD to ensure qualified applicants for Law Department vacancies are considered.
- 3. The 55-a Coordinator reviews all resumes received from MOPD for applicants interested in Law Department Positions.
- 4. The Law Department's Managing Attorney delivered a communication to agency leadership to reiterate the value of Civil Service Law 55-a and to highlight the agency's planned efforts during FY 2024 to better utilize this important tool. The agency is launching several efforts to better recruit 55-a eligible employees, including working with MOPD for additional "Spotlight" sessions with the Office of Citywide Recruitment and hosting mandatory trainings for hiring managers.

In addition to policies and programs stated above, the Law Department will consider the following to promote workplace inclusion:

1. The Law Department will seek to enhance inclusion of employees with disabilities through our Committees/Employee Resource Groups, which promote awareness, provide resources, and advocate for the needs of employees.

2. Employees at the Law Department practice law in many courthouses. The Office of EEO will seek to identify, compile, and disseminate a list of court personnel that can assist with accessibility issues at the various courts.

In addition to the above, the Law Department will continue to evaluate policies and procedures related to workplace inclusion to identify areas for improvement as set forth in the Local Law.

## Training

The Law Department considers training to be an important aspect in providing accessible programs and services. It is essential to ensure that everyone, including people with disabilities, can access our programs, services, and digital content. To ensure that the Law Department operates in a manner respectful to and inclusive of persons with disabilities, the agency will initially provide training in the following areas:

- 1. In 2024, all Law Department employees will be required to take the Disability Awareness and Etiquette training through DCAS.
- 2. The Law Department will collaborate with MOPD to provide training on digital accessibility methods and practices.

## Methodology

To identify barriers and devise plans to improve access at the Law Department a working group was formed, by seeking volunteers, via officewide email. Existing policies and procedures were reviewed. The working group included Law Department employees with diverse disabilities from various units. Members of the working group reviewed programs and services and compiled an initial list of potential barriers and actions for improvement.

The EEO Office will continue to review employee demographic data and data from the Citywide Equal Employment Database System ("CEEDS") to identify issues related to inclusion and accessibility.

The Law Department posted the five-year accessibility plan to <u>https://www.nyc.gov/site/law/about/accessibility-statement.page</u> for public comment concerning the plan.

# Appendix A New York City Law Department's Grievance Procedure

The New York City Law Department 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, individuals with disabilities are entitled to reasonable accommodations necessary to enable them to participate in programs, services, and activities.

Anyone who needs a disability-related accommodation in order to participate in a program or receive a service at the Law Department (involving matters other than employment) is invited to make their needs and preferences, with respect to accommodation, known to us by contacting the Law Department's Disability Service Facilitators (DSF):

> Leon Breeden Deputy Chief of Administration/Deputy EEO Officer 100 Church Street New York, NY 10007 Ibreeden@law.nyc.gov

> > Bijan Vafegh Assistant EEO Officer 100 Church Street New York, NY 10007 212-356-2602 **bijvafeg@law.nyc.gov**

Employees seeking a reasonable accommodation should refer to the Office Manual. A grievance regarding employment practices should be made to the Law Department's EEO Officer or a Deputy EEO Officer in accordance with the Law Department's Equal Employment Opportunity Policy, found in the Office Manual. A form for employees and applicants for employment seeking a reasonable accommodation can be found in our Office Manual or by clicking <u>here</u>.

# **Grievance Procedure under The Americans with Disabilities Act**

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 Law Department's Disability Service Facilitators listed above. Please submit any grievance in writing and include 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 complaint should be submitted by the grievant or the grievant's designee as soon as possible but no later than 60 calendar days after the alleged violation.

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

# <u>Appendix B</u>

# New York City Law Department's Website Accessibility Statement

The New York City Law Department 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) defines 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 <u>Website</u> <u>Accessibility Feedback Form</u>.

If you need assistance accessing a particular program or service, please reach out to the New York City Law Department's Disability Services Facilitator at 212-356-1000.

# **Assessment Approach**

The New York City Law Department assesses the accessibility of its digital content through self-evaluation.

# Date

This statement was created on 03/15/2023.