

NEW YORK CITY COMPTROLLER

Five-Year Accessibility Plan Benchmark

BUREAU OF PUBLIC AFFAIRS

May 2025

1 Centre Street, New York, NY 10007 • (212) 669-3916 • www.comptroller.nyc.gov



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Background

Local Law 12 of 2023 ("Local Law 12"), codified as section 23-1004 of the New York City Administrative Code, requires agencies to prepare and publish five-year accessibility plans using a template provided by the Mayor's Office for People with Disabilities ("MOPD"). Proposed plans were required to be published no later than December 31, 2023 and final plans, following a public comment period, were required to be published no later than March 15, 2024.

Local Law 12 further requires agencies to publish an annual report, setting forth the progress they have made towards achieving the goals in their five-year accessibility plan. These reports must be published on agency websites by May 1 and submitted to MOPD by May 15.

The Disability Service Facilitator ("DSF") for the Office of the New York City Comptroller ("OOC") is responsible for preparing the May 2025 -year accessibility plan benchmark.

General

The OOC works to promote the financial health, integrity, and effectiveness of New York City government, in order to strengthen trust, secure a thriving future for all New Yorkers, and build a more just, equitable, and resilient city. Led by an independently elected citywide official, the OOC provides checks and balances needed to hold City government accountable for budgeting wisely, investing responsibly, operating efficiently, acting fairly, living up to its obligations and promises, and paying attention to the long-term challenges we face together.

In the past year, the OOC developed a five-year plan to make the OOC more accessible to everyone. We tackled issues regarding the physical accessibility of the building, made our internal and external events. The OOC had made great strides in making our reports accessible and ensuring our workplace is more inclusive to people with disabilities. We have made great strides when it comes to our programmatic and digital accessibility. We continue to improve our website accessibility, making our Climate <u>Dashboard</u> and Claims <u>Dashboard</u> screen reader accessible this year and continuing to make our old reports accessible. Procurement and funding challenges have delayed efforts for projects requiring physical modifications to the 1 Centre Street building. Many of these projects require funding from the Department of Citywide Administrative Services ("DCAS") as well as discussions with outside vendors that we are currently unable to project a timeline. We also would like to ensure that we have a larger roster of vendors for American Sign Language ("ASL") and captioning in the coming year to stay on top of an increased demand by the public for these interpretation services.

Statement of Commitment

The OOC complies 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 OOC 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.

Disability Service Facilitator

Nicholas Astor

1 Centre Street, 5th Floor, New York, NY 10007

212-669-4736, accessibility@comptroller.nyc.gov

Grievance Procedures

You can find a link to our grievance procedures here.

You can give feedback on our plan here.

Feedback Process

For any feedback to our five-year plan, please reach out to Nicholas Astor by mail at 1 Centre Street, 5th Floor, New York, NY 10007, by phone at 212-669-4736, or by email at <u>accessibility@comptroller.nyc.gov</u>.

Physical Accessibility

The OOC continues to make good-faith efforts to physical accessibility, including:

- Building renovations: DCAS is awaiting budget approval to proceed with planned enhancements to the building, including renovations to the front entrance ramps, the elevators (e.g. arrival bell, doors remaining open longer), and that the sinks are up to standard. We are, however, still working with DCAS to figure out ways to make the only gender-neutral bathroom in the OOC accessible.
- Lighting upgrade: DCAS is progressively upgrading OOC space lighting (scheduled completion by June 30, 2025) in compliance with Local Laws 30, 88, and 97, which collectively have the requirements to upgrade lighting from incandescent to LED with lighting controls. The benefits for physical accessibility include improved illumination, which improves visibility for navigating the OOC office space, thereby reducing the potential of accident or injury.
- Signage: Updates and modernization of the OOC signage include raised lettering and braille transcription below the lettering. Signage will be placed according to ADA guidance to optimize accessibility. The OOC is in the process of finding a vendor within our budget to makes signage that includes both braille and raised lettering.
- Automatic doors: The OOC has streamlined the process in which employees can request repair of the automatic doors through our intranet system.
- Reception Areas: We have rearranged our common spaces and reception areas so that they are clear of obstructions for people with mobility devices.

Accessible Work Areas

The OOC has removed some unused furniture to improve accessibility in common areas throughout the floors occupied by the OOC.

Our Community Action Center ("CAC") currently has a Real-Time Text line ("RTT") installed. We are exploring RTT for other public facing bureaus, including the Bureau of Law and Adjustment.

Constituents have complained about issues with the microphones, in which individuals had to hold down a button to turn on the microphone to speak. Microphones which do not require individuals to hold down a button to speak were installed in the 5th floor board room. We are continuing to work with DCAS to reduce echoes in the 5th floor board room. The DSF will also work with Procurement and Administration to purchase an assistive listening device for public meeting areas.

Eating Areas

The food pantry spaces located in OOC occupied spaces do not require renovations

Evacuation Procedures

On April 30, 2025, staff were invited to a fire safety meeting where an overview of our fire safety procedure was held. This year we will give employees the option to self-identify if they need assistance in the profile portal of the Employee Self Service section of the Intranet. The OOC is in the process of building an employee volunteer list with their contact information to ensure that Fire Wardens know who on their floor is willing and available to assist someone on the accommodation list in case of an emergency. The OOC will also ensure that there is more than one volunteer identified for each floor to assist individuals.

Programmatic Access

The OCC continues to apply an equity lens through a variety of its projects.

In the last year, we published an economic <u>spotlight</u> on people with disabilities, which looked at employment rates of people with disabilities in New York City as well as nationwide.

Additionally, we completed a first-of-its-kind <u>express bus observation</u> with the audit team in which we looked at how accessible the express bus is to people with disabilities with the help of volunteers who personally tested out the express bus lift. We published an accompanying policy report on <u>bus reliability</u> with recommendations on how to improve bus speed and bus services while still making sure it is accessible to all riders with disabilities.

We also produced a policy report about the effect that the <u>climate crisis</u>, specifically flash flooding, has on our emergency notification system and emergency preparedness. We found that the City did not do enough to notify vulnerable populations, including people with disabilities, about where to evacuate and how to prepare for flooding.

We released a <u>micro-mobility report</u>, which laid out recommendations for how to regulate scooters, e-bikes, and mopeds on New York City streets.

Lastly, we sponsored the Disability Pride Parade in 2024 and the OOC and staff had a great time marching.

Digital Access

Web Accessibility Initiatives and Progress

This section outlines key initiatives undertaken by the OOC to enhance the accessibility of our office's digital presence, ensuring compliance with the Web Content Accessibility Guidelines ("WCAG") and fostering a more inclusive online experience for all users.

Proactive WCAG Audit

In alignment with our commitment to digital accessibility, our office is scheduled to conduct a comprehensive audit of our website during May 2025. This audit will assess our current web content and functionality against the WCAG 2.0 guidelines. The objectives of this audit are to:

- Identify areas of non-compliance: Pinpoint specific elements or functionalities that do not currently meet WCAG requirements.
- Evaluate the user experience for individuals with disabilities: Understand the challenges faced by users with visual, auditory, motor, or cognitive impairments when interacting with the OOC's website.
- Establish a clear roadmap for remediation: Develop a prioritized list of actions necessary to address identified accessibility barriers and achieve WCAG conformance.
- Ensure ongoing compliance: Implement processes and best practices to maintain accessibility standards in future website updates and content creation.

The findings of this audit will be critical in informing our subsequent accessibility efforts and ensuring that our website provides equitable access to information and services for all members of the public.

Employee Training on Accessibility Best Practices

Recognizing that a culture of accessibility begins with our team, we are scheduled to implement comprehensive training on web accessibility best practices for employees during summer 2025. This training program will equip staff with the knowledge and skills necessary to create and maintain accessible digital content. Key aspects of the training will include:

• **Understanding WCAG principles:** Providing a foundational understanding of the four core principles of accessibility: perceivable, operable, understandable, and robust.

- Implementing practical techniques: Demonstrating concrete methods for creating accessible text alternatives for images, proper heading structures, keyboard navigation, color contrast considerations, and accessible form design.
- Utilizing accessibility testing tools: Introducing employees to readily available tools and techniques for evaluating the accessibility of their work.
- **Integrating accessibility into workflows:** Emphasizing the importance of considering accessibility from the initial stages of content creation and website development.

By empowering employees with this knowledge, we aim to embed accessibility considerations into our daily operations, fostering a proactive approach to creating inclusive digital experiences. We anticipate releasing best practice guides as a supplementary resource to reinforce the training and provide ongoing support.

Enhanced Accessibility of the Climate Dashboard

We have made significant strides in enhancing the accessibility of our interactive <u>Climate</u> <u>Dashboard</u>. A key improvement involves enabling content editors to add custom descriptions to interactive charts. This crucial feature directly addresses the needs of individuals who rely on screen readers for web navigation and information consumption. By providing descriptive text that accurately conveys the data presented in visual charts, we are ensuring that users with visual impairments can fully understand and engage with this important information. This enhancement demonstrates our commitment to making complex data accessible to a wider audience.

Public Feedback Mechanism for the Five-Year Accessibility Plan

In our ongoing commitment to transparency and inclusivity, we have added a dedicated <u>feedback</u> <u>form</u> to our website to solicit ongoing public input on our <u>Five-Year Accessibility Plan</u>, further ensuring that our accessibility efforts are informed by the perspectives and experiences of individuals with disabilities and the broader public. The feedback collected through this form will be carefully reviewed and considered as we continue to implement and refine our accessibility plan, fostering a collaborative approach to creating a more accessible digital environment.

You can provide feedback at:

https://comptroller.nyc.gov/services/for-the-public/accessibility/five-year-accessibility-plan/feedback-form-for-five-year-accessibility-plan/

Events and Employee Programming

- The OOC continues to make good faith efforts when it comes to our events access, including:
 - Designate an employee to escort and accompany individuals with disabilities that request to be guided to the event location and remain onsite to address any needs that may arise.
 - Making sure that entrances are at least 32 inches wide.
 - When applicable, an elevator button that is maximum 54 inches from the ground.
 - When applicable, an elevator beeps as it passes each floor and or designate staff to accompany any persons who need to use the elevator.
 - Bathroom sinks are no higher than 34 inches from the ground.
 - Braille or raised lettering is on signage.
 - Entrances are at least 32 inches wide.
 - Grab bars in the bathroom stalls
 - Accessible entrance

The OOC has encountered some issues working with vendors to get last-minute accommodation requests. A two-week deadline before an event is the best timeline for our events team and our vendors. If an accommodation is requested less than two weeks prior to the event, we do our best to meet the accommodation request. We are also looking to expand our vendor roster to meet an accommodation if a vendor is unable to meet a request.

Effective Communication

The OOC hosts social and educational activities both online and in-person to facilitate accessibility for all employees. If an employee requires a Reasonable Accommodation to attend or participate in any event, they may contact the Equal Employment Opportunity ("EEO") Officer at <u>eeo@comptroller.nyc.gov</u>.

In addition, the agency provides transportation to external events for employees in need of assistance by utilizing our fleet of vehicles. Preparation of event space is supported by the OOC Facilities Team. Under the direction of the event manager, space is configured to accommodate attendees. Consideration is taken for placement of tables, chairs, and any equipment to ensure mobility access in and out of a space. In addition, the number of attendees anticipated for an event is taken into consideration when selecting a space to ensure it is not overcrowded and allows for mobility by all.

Standard language has been provided to all Bureaus indicating that information for Reasonable Accommodations should be included in all interview coordination correspondence. Bureaus should contact the EEO Officer for guidance on the reasonable accommodation process for candidates. The agency's EEO Office welcomes various forms of communication: in-person, telephone, videoconference, email, and other forms of digital communication. Multiple interview platforms are available as standard procedure.

Workplace Inclusion

Any employee – full-time, part-time, intern and temporary – may file a Reasonable Accommodation request to meet their accessibility needs. The agency's EEO Office follows Reasonable Accommodation procedural guidelines.

Reasonable Accommodations enable employees with disabilities to do their jobs and accommodations that modify the workspace are not uncommon, including, but not limited to, work from home, ergonomic chairs, standing desks, footrests and other devices that will assist the employee.

A request for a Reasonable Accommodation is submitted to the EEO Officer for review, discussion, research, and to assist in the resolution of the matter. If a Reasonable Accommodation is granted, the agency may procure, deliver, and install any required equipment or devices at the employee's workspace. The EEO Officer and the Executive Director of Administration will review the workspace to ensure that any modifications allow for accessibility, safety, and comfort for the employee to perform their job. For any such requests, OOC maintains a pooled budget for administrative expenditures which supports the procurement of accessibility goods or services when Reasonable Accommodation request is granted.

Employees and candidates for employment may request a Reasonable Accommodation to meet their accessibility needs via a form available on the OOC's intranet. Information about the Reasonable Accommodation request process is shared annually with employees agency-wide and is also available in the Employee Handbook and on the agency's intranet. Information about Reasonable Accommodation requests for employment candidates will be shared during interview scheduling communication.

The New York City Human Rights Law prohibits discrimination in New York City, in employment, housing and public accommodations.

For more information, visit <u>https://www.nyc.gov/site/cchr/law/the-law.page</u>.

Agency-Wide Trainings

The agency also requires annual mandatory Disability Awareness and Etiquette trainings to educate and encourage employees to foster a climate of acceptance, diversity, and inclusion.

Employee Trainings are listed below:

- Diversity & Inclusion / <u>Disability Awareness and Etiquette</u>: Employees learn to recognize and understand the important role that people with disabilities play in a diverse and inclusive workforce.
- Health & Safety / <u>Right-to-Know</u>: Public employers in New York State are required to provide annual Right-to-Know Understanding Chemical Safety in the Workplace training for all staff.
- Diversity & Inclusion / <u>LGBTQ-The Power of Inclusion</u>: The OOC remains committed to
 educating employees about transgender diversity and inclusion. The city's mandatory
 computer-based training focuses on the requirements under the Mayor's Executive Order
 16 and strategies to develop, implement and normalize inclusive behaviors in all city
 agencies.
- Ethics / <u>DOI Corruption Prevention Awareness</u>: The Department of Investigation's Corruption Prevention Awareness training module teaches employees to recognize and guard against corruption, waste, fraud, and wrongdoing in the workplace.
- Ethics / <u>Conflicts of Interest</u>: The Conflicts of Interest Board training covers restrictions on giving and accepting gifts, outside employment, volunteering, political activities, and misuse of position.
- Health & Safety / <u>Workplace Violence Prevention</u>: Annual training for employees is required under the New York State Workplace Violence Prevention law to identify risks of violence in the workplace and preventive measures, including appropriate work practices, reporting and emergency procedures.
- Diversity & Inclusion / <u>Sexual Harassment Prevention</u>: This city-mandated eLearning trains employees to define sexual harassment, understand what they can do to prevent and respond to sexual harassment, and know how they can make a difference in the workplace.
- Information Technology / <u>Cyber Security</u>: This session reviews key elements in today's cyber security threat landscape, the technology tools that the agency has deployed to strengthen the office's security landscape and best practices to enhance the overall security profile for the OOC's office.
- Health & Safety / <u>Video Display Terminal ("VDT"</u>): This training is designed to ensure that all employees are aware of Article 18 of the Citywide Contract that focuses on the

prevention or mitigation of VDT-related health problems for employees in the workplace by promoting safeguards for computer operators.

Diversity & Inclusion / Everybody Matters: EEO and Diversity & Inclusion Training: This city-mandated training ensures that every employee knows and understands their Equal Employment Opportunity rights, including the City's EEO policy, who is protected, what constitutes discrimination and who is entitled to an accommodation.

55-a Updates

The OOC nominated a new 55-a coordinator recently. We also conducted a comprehensive workshop for the bureau leadership and hiring managers in March 2025 on processes and rules related to hiring individuals with disabilities under Section 55-a of the New York State Civil Service Law. The office also sends monthly emails to staff notifying them of upcoming civil service exams. The 55-a Coordinator will in future plan lunch and learn sessions for all agency employees to disseminate information related to the 55-a program. We have also continued our partnership with AHRC NYC and look forward to potentially expanding it in the summer of 2026.

Consultations and Feedback

The five-year plan was created by the Accessibility Plan Working Group, which comprises of employees from across the agency, including the Bureau of Public Affairs, Bureau of Administration, Office of the General Counsel, Office of the EEO, Diversity and Inclusion, and Communications Department. This group met to identify progress made on the OOC accessibility initiatives. Community feedback to the plan was given at our disability justice roundtable on February 15, 2024. We also kept a form on the OOC's website where feedback could be submitted to our plan.

Conclusion

We are proud of the work this office has done so far, especially as it relates to programmatic access and event accessibility. The OOC's office has made great progress on our website accessibility and look forward to the May audit to implement further improvements where needed. We hope to make more progress on our long-term physical accessibility improvements to the building, but the timeline and resources for this project largely rest with DCAS who owns the building. We also hope to improve our employment through the 55-a Program and internship opportunities for people with disabilities and expand our vendor roster for ASL and captioning.





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