NYC Department of Social Services

NYC Department of Homeless Services

Local Law 12 of 2023
5-Year Accessibility Plan (2024-2028)

Table of Contents

General

About the Department of Social Services

The Department of Social Services (DSS) is comprised of the administrative units of the NYC Human Resources Administration (HRA) and the Department of Homeless Services (DHS). Through integrated management for HRA and DHS, client services can be provided more seamlessly and effectively. The City leverages shared service functions across agencies, which results in better day-to-day management and facilitates an integrated mission across agencies.

https://www.nyc.gov/site/hra/about/about-hra.page

About the Department of Homeless Services

Together with our not-for-profit partners, our mission is to prevent homelessness when possible, address street homelessness, provide safe temporary shelter, and connect New Yorkers experiencing homelessness to suitable housing. We do this with accountability, empathy, and equity.

As an agency comprised of almost 2,000 employees, with an annual operating budget of $3.8 billion, DHS is the largest organization of its kind committed to preventing and addressing homelessness in New York City. As it engages in this mission, DHS employs a variety of innovative strategies to help families and individuals successfully exit shelter and return to self-sufficiency as quickly as possible.

Collaborating with other public agencies and nonprofit partners, DHS works to prevent homelessness before it occurs, reduce street homelessness, and assist New Yorkers in transitioning from shelter into permanent housing. Furthermore, DHS remains committed to meeting its legal mandate to provide temporary emergency shelter to those experiencing homelessness in a safe and respectful environment.

DHS helps shelter clients access employment opportunities, connect to work supports and other public benefits, and search for housing, to better prepare for independent living.

https://www.nyc.gov/site/dhs/about/inside-dhs.page

Introduction: The 5-Year Accessibility Plan

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.

The NYC DSS (HRA & DHS) is fully committed to an inclusive and equitable environment for people with disabilities, whether they be our clients or our workforce.

Per Local Law 27 of 2016, each City Agency must designate a Disability Service Facilitator (DSF). The designated DSF for DSS/HRA/DHS is in the DSS Office of Disability Affairs (ODA) as part of the Office of Advocacy. This Office is also responsible for preparing and updating this 5-Year Accessibility Plan. Information on filing grievances regarding discrimination based on disability as well as the Agency's website accessibility statement are located on the webpage indicated below. The DSF contact information is as follows:

Office of Disability Affairs
Jennifer Shaoul
Executive Director of Disability Affairs / Acting Disability Service Facilitator for Homeless Services
Department of Social Services/ Department of Homeless Services
150 Greenwich Street – 42nd Floor
New York, NY 10007
Fax: 917-639-0442
Email: **disabilityaffairs@dss.nyc.gov**

Or you can call 718-557-1399.

Applicants and Clients with Disabilities - DHS (nyc.gov)

Executive Summary

DHS, in accordance with the *Butler* Stipulation of Settlement of 2017, plans to increase accessibility over the next five years in the following ways:

- Year 1
  - Complete the policy and procedure for oxygen tanks in congregate shelter settings
- Years 1-2
  - Emergency evacuations for people with disabilities
    - Develop and implement plans for training DHS and provider staff on best practices for evacuating people with disabilities in emergencies
    - Develop and implement procedure for reviewing and monitoring site-specific emergency evacuation plans

- o Develop and implement a procedure for scheduled and unscheduled site visits by the Director of Disability Affairs for Homeless Services
- Years 3-4
  - o Effective Communication: Alternative Formats
    - Gather universe of client-facing documents/forms
    - Prioritize for conversion to alternative formats
- Years 3-5
  - o Continue increasing accessible capacity
    - Survey new capacity upon availability
    - Continue to actively monitor construction portfolio for accessibility

In addition to the above, DHS has embarked on several initiatives to improve access for people with disabilities in shelter. Some highlights include:

- DHS implemented an extensive reasonable accommodations (RA) process so that clients with disabilities may make RA requests to meaningfully access shelter programs and services.

- DHS provides comprehensive full-day *Introduction to Disabilities* training for all client-facing DHS and provider agency staff. All other staff receive a half-day version of the training.

- DSS/DHS has extended the use of their sign language interpretation contract to all provider agencies who do not have their own contract, per written agreement. The Agency has also implemented an *ASL Options Card: A Tool for Staff*, making it easier for our employees to communicate interpretation options and time frames to the people we serve.

- DHS has completed plans to construct a new, accessible Women's Intake Facility in Brooklyn.

DHS is committed to being on and working with the members of the Advisory Board for Accessibility at Shelters created under Local Law 23 of 2023 to further refine and achieve our accessibility goals.

There are several other important initiatives in process or planned, as outlined in this document. Please contact us at disabilityaffairs@dss.nyc.gov to provide feedback on this plan or to share other ideas that would enhance our ability to serve people with disabilities.

Agency Plan

Physical Access

DHS engaged in extensive analyses of facilities and created remediation plans to ensure that shelters are accommodating and inclusive of clients with disabilities, where we can. Remediation plans included but are not limited to:

- Updating signage
- Moving/replacing furniture
- Installation of devices/fixtures where applicable

Minor or major renovation of facilities is ongoing.

See Programmatic Accessibility for the process of applying for a reasonable accommodation (RA) for a person with a mobility disability. Examples of RAs for this population include, but are not limited to:

- Placement in wheelchair-accessible unit
- Placement in elevator building or first floor
- Access to bathroom with accessible features
- Medical or disabling condition requiring location-based placement

DHS's open-ended request for proposals (RFPs) contain language regarding accessibility with the Americans with Disabilities Act (ADA) and also indicate that greater consideration will be given to facilities that are or can be made ADA accessible.

Steven Winter Associates, Inc. (SWA) is the accessibility consultant contracted by DHS to conduct inspections, monitor and confirm compliance with architectural accessibility requirements. SWA's engagement includes, but is not limited to:

- plan reviews
- inspections
- remediation plan development
- technical assistance during design and construction
- training
- documentation of compliance

Architectural Accessibility Requirements
As part of the *Butler* Stipulation of Settlement, and an agreement between DHS with SWA, shelter facilities are inspected by SWA to confirm compliance with the architectural accessibility requirements of Chapter 11, Accessibility, of the New York City Building Code, the Americans with Disabilities Act, and the Fair Housing Act (FHA).

If shelter facilities receive federal funding from the US Department of Housing and Urban Development (HUD), then the architectural accessibility requirements included in Section 504 of the Rehabilitation Act of 1973 apply.

SWA assesses existing and newly constructed DHS shelter facilities for compliance with the architectural accessibility requirements of the ADA and the 2010 ADA Standards. SWA also assesses shelter facilities built for first occupancy after March 1991 for compliance with the architectural accessibility requirements of the FHA. SWA is not tasked by DHS to confirm compliance with Section 504. Design teams must ensure compliance with Section 504, if applicable.

The general rule of thumb is that when multiple requirements apply to a project, the most stringent requirement drives. To that end, SWA ensures that projects comply with the most stringent architectural accessibility requirement of all that apply.

In 2018, SWA created an assessment tool for measuring accessibility compliance in accordance with the relevant sections of the US Department of Justice (DOJ) Toolkit. SWA surveyed 51 existing shelters and intake sites across the system and provided remediation reports. As funds become available, DHS will use the recommendations from these reports to achieve accessibility compliance in sites that have been identified as suitable for remediation.

For pipeline sites, SWA reviews design plans and conducts onsite construction monitoring to assess the building for compliance with all applicable accessibility codes and laws. DHS is focused on increasing accessible capacity through the pipeline sites as it has proven to be more expeditious. These sites cut across all boroughs and all population types.

Action items:

- Continue increasing accessible capacity
    - Survey new capacity upon availability
    - Active construction monitoring
  - Unit(s) Responsible: DHS: Capacity Planning and Development (CPD); DSS: Office of Legal Affairs (OLA) *Butler* Implementation team
  - Time Frame: 1-5 years

- Explore ways to keep accessibility data up-to-date in the Building Compliance System (BCS) system:
  - Unit responsible: DSS: ODA, *Butler* Implementation team, Information Technology Services (ITS); DHS: Office of Program Development and Implementation (OPDI)
  - Timeline: 1-5 years

- Complete construction of new accessible Women's Intake Facility in Brooklyn
  - o Unit(s) Responsible: DHS: CPD; DSS: OLA *Butler* Implementation team
  - o Time Frame: 1-5 years

Digital Access

Websites

The DSS Office of Communications and Marketing (OCM) is the team principally responsible for creating and maintaining digital content for DSS-HRA-DHS websites. Every member of OCM's Digital Communications team and two members of OCM's Graphics team have received training from MOPD on creating and evaluating accessible digital content, and this team has implemented procedures for ensuring the accessibility of digital content under their purview. This includes email communications to the public, which are currently hosted on HubSpot, a platform that includes features supporting accessibility. OCM is also exploring developing these policies and procedures further, using NYC Department of Information Technology and Telecommunications/Office of Technology and Innovation's (DOITT/OTI) policies for external communications as a model.

The DSS websites are administered by DOITT/OTI and are thus subject to their accessibility requirements and annual audits. These audits include user testing by people with disabilities. Audits address the websites' compliance with the Web Content Accessibility Guidelines (WCAG). WCAG defines accessibility requirements for designers and developers and delineates three levels of conformance: Level A, Level AA, and Level AAA. DSS' digital content has been deemed partially compliant (WCAG 2.1 level AA) since some parts of the content do not fully conform to this accessibility standard.

The principal challenge DSS has in achieving full accessibility is the large number of documents, nearly 3,000, hosted on the website, which are developed and/or sourced from a large number of program areas and other government entities.

Action Items:

- ▪ ODA and OCM will collaborate on creating a policy with guidelines for program areas on creating accessible digital content for the website. This policy will address creating accessible documents, including ensuring any images have appropriate alt text implemented. ODA and OCM will offer subsequent trainings on this policy once implemented, as needed.
  - o Units responsible: DSS: OCM, ODA

  o Timeframe: Years 1 and 2

 ▪ ODA and OCM will collaborate on creating a 3–5-year remediation plan for documents that were previously posted on the DSS, HRA, and DHS websites and are not fully accessible.
  o Units responsible: DSS: OCM, ODA
  o Timeframe: Years 3-5

Videos

All videos posted on the DSS, HRA, and DHS website, as well as social media, includes Closed Captioning. OCM adheres to color palettes for video graphics that ensure accessibility for people who are low vision. Some videos include audio descriptions under the videos, in the text of the webpage.

Action Items:

 ▪ OCM will inventory which pages do not have this feature and will implement this feature across Agency websites.
  o Unit responsible: DSS: OCM
  o Timeframe: 1-4 years

 ▪ OCM will identify videos that will remain on Agency websites long-term, to remediate by adding built-in audio descriptions and American Sign Language (ASL). OCM will explore options for engaging a vendor to add built-in audio descriptions and ASL to these videos.
  o Unit responsible: DSS: OCM, Finance
  o Timeframe: 1-5 years

Social media

OCM's Digital Communications team is responsible for content posted on Agency social media accounts. All social media content which includes images has appropriate alt text incorporated, and all such content avoids the use of ASCII text. All video content on social media includes Closed Captioning.

Programmatic Access

Overview: Programmatic Access at DHS

As a result of the *2017 Butler v. City of New York* Stipulation of Settlement previously mentioned, DHS implemented an extensive reasonable accommodations (RA) process

so that clients with disabilities may make RA requests to meaningfully access shelter programs and services. The RA process includes:

- Non-exhaustive RA menu
- Screening intake for RAs
- Notices and receipts for clients' records
- Substantive review process of requested RAs
- Decision notice to clients with appeal information
- Substantive appeal review process
- Appeal decision notice to clients
- RA reassessment process
- RA renewal process
- Interactive process for clients

The non-exhaustive RA menu enables clients to request RAs that typically remove barriers to access for people with disabilities (e.g., placement in a first-floor unit or building with an elevator, accessible features, wheelchair accessible units and bathrooms), as well as request an RA for their specific needs that does not appear as an item on the RA menu (e.g., Other RA). RA menu categories include:

- General/physical access
- Help with paperwork/documentation/case support
- Timeliness and flexibility
- Communication
- Miscellaneous

DHS also created policies/procedures, notices, posters, flyers, etc. as part of the Agency's obligation under *Butler*, including but not limited to:

- Interim RA desk guide
- ESA desk guide
- *Butler*/Disability Poster/Signage
- Model contract language
- Access control guidance
- RA Flyer and HIPAA Informational Flyer
- Hospitalization Policy
- Service dog policy
- Best Practices for People with Disabilities in Emergency Evacuations

As required by *Butler*, DHS developed a Disability Access and Functional Needs (DAFN) unit with a director. This unit is responsible for entering and tracking RA requests, as well as providing RA process oversight and acting as a liaison for all shelters and intake/assessment within the DHS system.

DSS also has the Director of Disability Affairs for Homeless Services position, required by *Butler*. The Director has expertise regarding Title II requirements, collaborates with DHS program areas to assess, develop, and review policies and procedures, and coordinate with program areas to improve service delivery for people with disabilities in the shelter system.

DHS is required under the *Butler* Settlement to complete a population analysis every two years. The purpose of this report is to aid the administration in better understanding the number of clients with disabilities in the shelter system. Using this data, DHS continues to make informed decisions regarding accessible capacity needs, additional services for clients with disabilities, and improvements to existing processes.

See below for information regarding trainings on disability-related topics for DHS and provider staff.

Within the next five years and in accordance with the *Butler* Stipulation of Settlement, the Agency plans to increase accessibility in the following ways (outlined by year):

Action Items

- Complete the policy and procedure for oxygen tanks in congregate shelter settings
    - Units responsible: DHS: OPDI, DHS Programs; DSS: OLA *Butler* Implementation team
    - Timeframe: Year 1

- Planning for emergency evacuations for people with disabilities
    - Develop and implement plans for training DHS and provider staff on best practices for evacuating people with disabilities in emergencies
    - Develop and implement procedure for reviewing and monitoring site-specific emergency evacuation plans
    - Units responsible: DHS: OPDI, DHS Programs; DSS: ODA, OLA *Butler* Implementation team
    - Timeframe: Years 1 and 2

- Implement procedure for scheduled and unscheduled site visits for the Director of Disability Affairs for Homeless Services
    - Units responsible: DHS: OPDI, DHS Programs; DSS: ODA, OLA *Butler* Implementation team
    - Timeframe: Years 1 and 2

Street Homeless Solutions (SHS)

The Street Homeless Solutions Division (SHS) provides outreach to individuals experiencing street homelessness. It also offers low-barrier placement options including Safe Havens, Stabilization Beds, and Drop-in Centers. SHS believes that it is important for every individual to be able to access placement options which meet their individual needs.

SHS currently has two Safe Havens, the Reception Center, and the Kelly, that specialize in housing clients with Serious and Persistent Mental Illness (SPMI). These Safe Havens are clinically rich and are able to assist clients who have a variety of psychiatric conditions.

SHS has a number of nurses and clinicians on staff to assist individuals experiencing street homelessness. These staffers are able to assist those with addiction-related illnesses through overdose treatments, prescriptions for medically assisted treatment, and referrals to treatment centers and safe injection sites. These staffers are also able to assist individuals suffering from mental illness through assessments and referrals to treatment. Finally, these staffers are able to assist individuals with disabilities that often present or cause acute issues such untreated diabetes leading to open wounds or sores.

SHS makes efforts to ensure that accessible rooms for clients with mobility issues are available within the safe haven and stabilization bed portfolio. SHS teams also assist clients in applying for reasonable accommodations and taking steps necessary to meet such accommodations which can range from specialized meals, to installing air conditioners, to moving rooms. When SHS doesn't have any vacancies in its portfolio that will meet a client's needs, the program reaches out to the Adults system to see if they have any available options.

Action Items:

- SHS plans to bring on additional nurses within the next fiscal year who can help clients with their substance use, mental health and medical needs.
  - o Units responsible: DHS: SHS
  - o Timeframe: Years 1 and 2

- DHS is planning to add an additional accessible Safe Haven and an additional accessible Drop-In Center to its portfolio
  - o Units responsible: DHS: CPD, SHS; DSS: *Butler* Implementation team
  - o Timeframe: Years 1-3

- In addition, see the Action Items in the section regarding DHS above as well as the Training section.

DSS Office of Chief Medical Officer

The DSS Office of the Chief Medical Officer has implemented the following in order to enhance the resources available to staff in shelter who provide services to people experiencing homelessness who have mental health, medical, or physical disabilities:

- Developed a Healthcare map showing vetted medical and behavioral health facilities ([Homeless Healthcare Resources - Google My Maps](#))
- Developed fact sheets on the most common conditions seen in shelter and care coordination tools
- Oversee the provision of medically-tailored meals
- Conduct monthly doctor's hours where any shelter staff can participate and ask questions, including providing information on health and on disabilities
- Provide training for shelter directors on health issues, including medical conditions, mental health conditions, and overdose prevention
- Provide consultation and complex case coordination for clients with complex medical and behavioral health issues, including disabilities
- Oversee the institutional referral procedure which describes the process by which hospitals and nursing homes refer clients to DHS, including how to request RAs
- Provide easily accessible resources to shelters: Nurse Call Line, H+H ExpressCare
- Assist shelters with connection to assisted living facilities and nursing homes
- Assist with health insurance access for older clients and those with disabilities
- Developed a Harm Reduction Strategic plan, provide technical assistance and harm reduction and overdose prevention related training at all shelter and oversee the provision of harm reduction services on site at select shelters
- Oversee nurse and patient navigator services on site at select shelters to provide direct service to clients with high medical needs at the shelters where this program is located

Action Items:

- Conduct suicide prevention training for staff
    - Units responsible: DSS: Office of the Chief Medical Officer
    - Timeframe: Year 1

- Implement child mental health access to care via telehealth
    - Units responsible: DSS: Office of the Chief Medical Officer
    - Timeframe: Year 1

- Implementing grant from HUD to provide complex care coordination to clients experiencing street homelessness, including mobile health services onsite in Safe Havens
    - Units responsible: DSS: Office of the Chief Medical Officer
    - Timeframe: Year 1

DSS Office of Supportive/Affordable Housing & Services (OSAHS)

The mission of the Office of Supportive/Affordable Housing and Services (OSAHS) is to assist in the placement of homeless and unstably housed individuals and families into affordable permanent housing. We partner with community providers and other city agencies to connect New Yorkers to safe, stable, and healthy living environments, helping them to improve their quality of life. We believe everyone deserves a safe place to live and we are dedicated to creating and providing innovative and affordable housing solutions.

OSAHS is focused on assisting in the development and operation of permanent housing solutions for formally homeless individuals and families. OSAHS works closely with other divisions of HRA and with other governmental and non-governmental service providers to develop new housing programs and to refer households we serve so they can achieve their optimal functioning in a safe and supportive environment. In addition, we assist in placing thousands of households experiencing homelessness, some with disabling conditions, into supportive and affordable units each year.

OSAHS utilizes the Coordinated Assessment and Placement System (CAPS) to assist in the referral and placement of those households eligible for supportive housing. CAPS is a web-based system that is utilized by service providers to apply households for supportive housing and assist them in referral and placement process. CAPS is not a client-facing system. Any providers or agency staff who need accommodations to access this web-based system will be assisted by OSAHS.

Action Item:

- DSS is in the midst of developing systems so that people in the DHS system with reasonable accommodations for mobility and/or sensory disabilities are identified for potential supportive housing placements that have set-asides for these populations.
  - Units responsible: DSS: OSAHS, ODA, Office of the Chief Medical Officer; DHS: Rehousing Support Division
  - Timeframe: Years 1 and 2

Staff Training and Resources
All DSS/HRA/DHS employees receive a 4-hour *Introduction to Disabilities* training during New Employee Orientation that covers disability etiquette, appropriate language, the history of disabilities in the United States, the Americans with Disabilities Act, effective communication, and reasonable accommodations, among other topics. These trainings will continue.

DHS has implemented extensive disability-related trainings that will continue on an ongoing basis. DHS and provider staff are trained on the following as part of the *Introduction to Disabilities* Training (Parts I and II):

- Disability Etiquette
- Appropriate disability language
- History of disabilities in the US
- Information on different types of disabilities:
  - Communication disabilities
  - Sensory disabilities
  - Mobility disabilities
  - Service animals v Emotional Support Animals
  - Developmental disabilities
  - Intellectual disabilities
  - Invisible disabilities
  - Psychiatric disabilities
  - Medical conditions
- Reasonable accommodations at DHS (overview of the process)

DHS also implemented an e-Learning training for DHS and provider staff specifically on the RA process and how to request, process, and inform clients about the RA process and the system of record established for tracking client RA requests.

ODA ADA Events, Lunch & Learns, the Disability Digest, Housing Resource Guide

The DSS Office of Disability Affairs (ODA) has engaged in several projects to help DSS/HRA/DHS staff and our contracted provider agencies enhance their knowledge, skills, and resources in their service of people with disabilities. These projects have an added benefit of providing our staff with resources that potentially benefit themselves and their family members. These activities include:

- **ADA Anniversary Celebration Events:** Each year, ODA hosts events in honor of the passage of the Americans with Disabilities Act. These events provide our staff with access to resources and knowledge that will assist them in providing quality services to people with disabilities. ODA has also begun providing Excellence Awards to individuals and teams that provide exceptional service to people with disabilities. A sampling of Event topics:
  - **Homeward Bound: Housing Resources for People with Disabilities** (this also resulted in an accompanying manual on Housing Resources for People who Have Disabilities or are Aging that is currently made available to all staff)
  - **Aging with Dignity** (including a resource fair)
  - **A Roadmap to Mental Health for All**

- o **The Road to Inclusion: Championing People with Disabilities in the Workplace** (This segment included training for supervisors entitled *Creating a Mentally Healthy and Disability-Friendly Workplace*)
  - o **The Changing Landscape of Accessibility: How to Be Inclusive in Our Digital World**
  - o **Justice for All: Building an Accessible and Equitable Post-Pandemic Agency**
  - o **Tools for Transformation: An Adaptive Technology Expo** (Our most recent event that included both expert presentations AND hands-on technology demonstrations)

- **Monthly Lunch & Learns**: In 2023, ODA launched monthly Lunch & Learns, available to all DSS/HRA/DHS staff and staff of our contracted provider agencies. These hour-long presentations, hosted on Zoom, allow staff to learn in a remote session while enjoying their lunch hour, without taking time away from their busy jobs. Topics have included: Mental Health Crisis Services; Overview of the OPWDD Service System; an Animal Resource Forum; Resources for Individual who are Blind or Low Vision; the Medicaid Buy-In Program for Working People with Disabilities, and many more. ODA also collaborated with the Office of Equity and Inclusion (OEI) on two additional Events: Neurodiversity in the Workplace and Signing Black in America.

- **Disability Digest**: Also in 2023, ODA launched the *Disability Digest* newsletter. Each issue includes a theme, e.g. transportation, recreation and the arts, and includes helpful policies, articles, programs and events related to the topic and disability. This newsletter is sent electronically to staff that provide more intensive services to the people we serve as well as staff that have attended our ADA Events, Lunch & Learns, as well as our DHS *Introduction to Disabilities* trainings.

  Housing Resources for People Who are Aging or Have Disabilities: A Reference Guide In 2018, ODA developed a guide to Subsidy and Placement programs for people who are aging or have disabilities. This Guide has been circulated widely in print and digital format and is referenced and distributed during *Introduction to Disabilities* training.

Action Items:

- Continue Annual ADA Celebration Events; Monthly Lunch & Learns; *Disability Digest* Newsletter
  - o Unit Responsible: DSS: ODA
  - o Timeline: Years 1-5

Effective Communication

General

Updating "Auxiliary Aids" Signage at DHS and Provider Sites

In 2023, signage was updated regarding available help for people with disabilities who have communication needs. This signage eliminated language on a previous version which the Agency felt was unclear. The new signage includes plain language and will help ensure all DHS clients are aware of the availability of sign language interpretation, help with reading forms, and other aides for those who need assistance with communication.

Action Item:

- Ensure updated signage is rolled out at DHS and provider sites across the shelter system
  - Units responsible: DSS: ODA, OLA *Butler* Implementation team; DHS: OPDI, Programs
  - Timeline: Year 1

Effective Communications for People who are Deaf or Hard of Hearing

Provision of Sign Language Services

When DSS/HRA/DHS consolidated its administrative operations in 2017, the Office of Refugee and Immigrant Affairs (ORIA) began managing the Agency's sign language interpretation contract, streamlining services to better support the deaf and hard-of hearing community. Sign language services were no longer viewed solely as a reasonable accommodation request, but also considered a language service.

Our Agency requires that contracted providers offer a full suite of language services, including sign language services. DSS/HRA/DHS acknowledges that this is a heavy burden for non-profit partners. In order to take advantage of the Agency's larger purchasing power, the Agency has shared our contract for sign language services with many of our service providers. The Agency currently shares our sign language contract with 237 providers, including 165 at DHS and 72 at HRA.

ORIA continues to work diligently to ensure that all of our clients who use signed languages get the support that they need. ORIA has contracts to provide sign language interpretation through video remote interpretation (VRI) or in-person. They are able to procure certified deaf interpreters (CDIs) as well as Communication Access Realtime Translation (CART) services.

ASL Direct

People who are deaf and use American Sign Language (ASL) can contact DSS/HRA/DHS directly via videophone through the Office of Constituent Services (OCS), which houses a Deaf & Hard of Hearing Information Specialist who uses ASL to answer questions regarding programs, services and cases. Find out more about ASL Direct here: [ASL Services for HRA and DHS Clients (nyc.gov)](#)

Action Item:

- DSS will explore funding for an additional ASL Direct staff member.
  - Units responsible: DSS: OCS, ODA
  - Timeframe: Years 1-3

ASL Options Card: A Tool for Staff

DSS developed a tool available to staff that are communicating with people who are deaf who are requesting sign language interpretation. The card is a simple way of offering the interpretation options available, depending on the situation:

- In-person
- Video remote interpretation (VRI)
- Scheduling an appointment for a later date and time when a sign language interpreter will be made available.

The card also indicates the wait time for each option. An ASL video desorption of the card is available on our website: [ASL Services for HRA and DHS Clients (nyc.gov)](#)

HRA and DHS Provider agencies are permitted to use this card for communication purposes, regardless of whether they use the DSS ASL contract.

ASL Communicard

ODA is in the midst of developing a communication tool for shelter clients that will be called a Communicard. While the target audience for this tool are clients who are deaf or hard-of-hearing, it may also be utilized by non-English speakers or individuals with cognitive disabilities. The card will display an assortment of images depicting simple requests that clients may point to when they need assistance quickly. This will only be used for the most basic requests to avoid requiring the client to wait while the site obtains ASL interpretation services. ODA has already met with selected shelter staff and professionals who serve the deaf community for initial guidance on creating this tool.

Action Items:

- Develop a Communicard prototype to be tested through a series of focus groups with individuals who are deaf who reside in shelter as well as

client-facing shelter staff who have a background in American Sign Language and/or frequently interact with this population. The card will also be tested with other professionals in the field who are deaf or hard-of-hearing, including staff from MOPD.

- o Units responsible: DSS: ODA, OCM
- o Timeframe: Year 1, with the goal of launching by Year 2.

ASL Mini-Course

In 2023, in collaboration with MOPD and DSS's ASL Direct Program, ODA offered a 4-week hourlong mini-course on the basics of ASL. Over 700 DSS/HRA/DHS employees and contracted provider agency staff requested to participate. Students were selected based on the value of the course to their day-to-day work and their ability to commit to the program. The course was very well-received, and a 6-week course was offered in 2024.

Action Items:

- Offer additional ASL Mini-Courses as staffing and time allows
  - o Units responsible: DSS: ODA, OCS (with the assistance of MOPD)
  - o Timeframe: Years 1-5

Sorenson Communications Providing Free Video Phones to DHS Clients

Sorenson Communications has a developed a program to provide free iPod Touches for use as video phones, to be given to individuals residing in shelter who are deaf or hard-of-hearing and who do not currently have a device for this purpose. This program is meant to facilitate individuals in shelter having video phones despite lacking a residence address, which is usually required for video phone users for registering with the Federal Communications Commission (FCC). DSS ODA has partnered with Sorenson Communications to identify individuals in shelter who are deaf and eligible for this program and connects these individuals with the team at Sorenson on an ongoing basis.

Providing Clear Masks to DHS, HRA, and Provider Staff to Facilitate Communication with Individuals who are Deaf or Hard-of-Hearing

During the COVID-19 pandemic, and with the assistance of MOPD, ODA began providing clear masks to DHS, HRA and provider sites who have clients who are deaf or hard-of-hearing. This is meant to ensure staff can access appropriate Personal Protective Equipment (PPE) that facilitates communication if a client is deaf or hard-of-hearing. ODA provides clear masks to shelter and program staff members who attend our *Introduction to Disabilities* training course in-person (as well as mail them out to sites who request additional materials).

Effective Communication for People with Vision Disabilities

Select documents in alternative formats are available on the disability access page of the DHS website.

Action Items:

- DSS has convened a work group to implement the purchase of conversion services to the alternative formats from an external vendor.
  - Units Responsible: DSS: ORIA, OLA, ITS, Finance, ODA
  - Timeline: 1-5

- Produce and distribute Alternative Formats of client-facing documents
    - Gather universe of client-facing documents/forms
    - Prioritize for conversion to alternative formats
    - Work with DSS for inclusion of DHS forms in their future contracting with external vendor
  - Units responsible: DHS: OPDI; DSS: ORIA, OLA *Butler* Implementation team, ODA
  - Timeframe: Years 3-5

- Develop a Job Description for a Digital Inclusion Officer and explore potential funding sources
  - Units responsible: DSS: ITS, Office of Policy, Procedures and Training (OPPT), OCM, ODA, Finance
  - Timeframe: Years 1-3

Workplace Inclusion

Recruitment

DSS has used the <u>55-a Program</u> to hire people with disabilities for competitive positions more than any other City Agency and has hired and promoted people with disabilities at all levels, not just entry-level. 55-a employees are encouraged to take Civil Service Exams. Candidates can be interviewed in person or virtually. Structured interviews are used, where all candidates are asked the same questions. All new employees receive a 4-hour *Introduction to Disabilities* training (see Training Section). If employment/personnel notices are requested in alternative formats, HRA is able to provide them.

Action Items:

- Human Resources Solutions will engage with MOPD to participate in Job Fairs for people with disabilities as well as develop a plan to post positions on the NYC:ATWORK job boards.
    - Units Responsible: DSS: Human Resources Solutions (HRS), ODA
    - Timeframe: Year 1

- HRS will adapt their interview and candidate confirmation letters and emails to include information on requesting accommodations.
    - Units responsible: DSS: HRS, Equal Employment Opportunity Office (EEO)
    - Timeframe: Year 1

- HRS, in collaboration with EEO, will create a policy directive for hiring managers to use as reference tool for arranging accommodations for an interview and for new hires.
    - Units responsible: DSS: HRS, EEO
    - Timeframe: Year 1

- The Office of Equity & Inclusion is in the process of working with HRS to update the diversity recruitment resources and will include disability access in the Diversity Recruitment Plan
    - Meet with HRS to update the Diversity Recruitment Plan
    - Units responsible: DSS: OEI, HRS
    - Timeframe: Year 1

Partnership for Inclusive Internships (PII)

In 2016, DSS began a partnership with AHRC NYC, funded by The Taft Foundation, that promoted internships for people with disabilities in government. The Partnership for Inclusive Internships (PII) was so successful that it is now in several other City Agencies and has expanded to NYS government agencies based in NYC. Over 160 interns have completed the program, many who have subsequently obtained employment, many within our own Agency. It is currently funded through the New York Community Trust. The program has won local and statewide awards and been featured in both print and television media outlets. This program has also been utilized as a successful strategy to promote 55-a hiring at DSS, allowing qualified candidates with disabilities to apply for competitive positions in NYC government without having to take a civil service examination. PII internship vacancies are shared with a wide range of partner organizations serving the disability community, including ACCES-VR and CUNY LEADS.

Action Items:

- Work with Talent NYC and AHRC NYC to ensure continued funding for the PII Program

- o   Units Responsible: ODA, HRS
- o   Timeframe: 1-5 years

Reasonable Accommodations for Staff

The agency follows the <u>DCAS Reasonable Accommodation Procedural Guidelines</u>. Employees can request ergonomic office equipment and technology among other things by requesting a reasonable accommodation. Employees can apply for an accommodation on the Agency's intranet or by contacting the EEO Office. This information is shared during *New Employee Orientation* and yearly as part of *Right to Know* training. The agency follows the collaborative dialogue process for reasonable accommodations. Employees are given the options to meet in person or via teams.

Action Items:

- •   EEO will work with ITS to develop a system to fast-track access to equipment and technology for accessibility.
  - o   Units responsible: DSS: EEO, ITS
  - o   Timeframe: Years 1 and 2

- ▪   As funding allows, ITS will upgrade the current version of Visual Studio (2020) to Visual Studio (2022 r:17.5) which has programmer accessibility tools to ensure digital accessibility of new and modified systems developed/supported by ITS to meet Digital Content Accessibility requirements.
  - o   Unit responsible: DSS: ITS
  - o   Timeframe: 1-5 years

- •   Absorb (training scheduling and management system) notice will be revised to ask: "Do you need a reasonable accommodation to attend this training?" with details regarding how to request an RA with a deadline.
  - o   Unit Responsible: DSS: OPPT, EEO
  - o   Timeframe: Year 1

Digital Access for DSS-HRA-DHS Staff

While procurement language requires that systems be accessible, the assessment and incorporation of digital content accessibility is currently not integrated into the existing Systems Development Life Cycle (SLDC) at ITS. ITS will begin formulating processes within the various ITS groups to meet these requirements.

Digital Accessibility as validated by the ITS Quality Assurance (QA) Testing Group can be included in the ITS Systems Development Life Cycle and subsequently reviewed by bi-weekly ITS Change Advisory Board (CAB) Approval Process. The CAB (initiated 2017) ensures that all pre-implementation tasks (network infrastructure, development,

testing, roll back) are complete before any system is migrated to the DSS Network or at NYC.GOV. Client-facing systems will be included.

Legacy staff-facing databases and websites do not all conform to W3C's web content accessibility guidelines. As replacement systems are developed, ITS will adhere to WCAG requirements.

Camtasia training videos, as created by the ITS Staff Development Training Group, include voice over and captions.

Action Items:

- The ITS QA Testing Group will seek funding for 1-2 full time Digital Accessibility staff to test all new and modified systems to ensure that ITS Systems comply with Digital Accessibility requirements. In addition, upon migration to the testing environment, pre-production applications will be subject to unit and regression testing by QA Testing staff before systems are signed off and moved to production on the DSS Network or at NYC.GOV.
    - Units responsible: DSS: ITS
    - Timeframe: 1-5 years

- ITS will ensure that digital accessibility requirements are consistently included in contracts awarded to service integrators/providers.
    - Units responsible: DSS: ITS
    - Timeframe: 1 year

- To ensure that digital content that is created by ITS for employees is accessible, ITS will work with ODA to make training on digital accessibility available.
    - Units responsible: DSS: ITS, ODA
    - Timeframe: 1-3 years

Other Activities

Other Training for Leadership
DSS currently conducts a yearly training entitled *Creating a Mentally Healthy and Disability-Friendly Workplace* for our Leadership Development Institute.

Action Item:

- DSS will offer this training 2-4 times a year for supervisory staff.
    - Units responsible: DSS: ODA, EEO, HRS, OPPT
    - Timeframe: Years 1 – 5

Office of Equity and Inclusion (OEI)
The Office of Equity and Inclusion (OEI) will continue to coordinate events around accessibility, awareness, and inclusion individually and in partnership with ODA.

Action Item:

- The Office of Equity and Inclusion is assisting interested staff in launching a Disability Employee Resource Group (ERG)
    - o Units responsible: DSS: OEI
    - o Timeframe: Year 1

Employee Events
All Employee Events take place in accessible facilities. Employees can request an accommodation if needed.

Action Item:

- Office of Equity and Inclusion will include the following phrase in future communications about Agency events/activities: *If you need a reasonable accommodation to attend this event, please email equity@dss.nyc.gov by (date).* This communication will include accessibility symbols, as appropriate.
    - o Unit Responsible: DSS: OEI
    - o Timeframe: Year 1

Methodology

As part of the settlement in *Butler v. City of New York* (2017), the NYC Department of Homeless Services (DHS) has developed extensive policies, procedures, and processes to accommodate the needs of clients with disabilities in the shelter system. These efforts have been outlined above.

In addition, ODA engaged in the following activities:

Self-Evaluations: ODA met with Agency Divisions and Programs reviewing Self-Evaluation Tools provided by MOPD and had follow-up sessions with liaisons to complete planning.

Review of Complaints: Besides the cases and complaints that ODA receives directly, ODA regularly reviews complaints and issues related to disability that are received by OCS. ODA responds to trends identified through these reviews, leading to remediation

of access concerns, development of policies/procedures and edits to or additional training. These reviews informed the development of this Plan.

HRA Disability Advisory Panel: Since 2015, HRA has hosted a quarterly Disability Advisory Panel. Members include advocates with disabilities and representatives from agencies that regularly assist people with disabilities in obtaining and maintaining HRA benefits. The Panel was asked for recommendations and feedback regarding the development of this Plan for both HRA and DHS.

Focus Groups at DHS Shelters: ODA conducted 3 focus groups with people with disabilities across shelter types, asking open-ended questions regarding their respective experiences with access and requesting suggestions for enhancing accessibility at DHS and at HRA.

Focus Groups: The Office of Disability Affairs met with the Center for Independence of the Disabled in NY (CIDNY) Consumer Advisory Network and received feedback on both HRA and DHS services. ODA conducted another Focus Group organized by Coalition for the Homeless.

In addition:

This Plan was placed on the disability access page of the DHS website for comment. MOPD also posted the proposed plan and notice of opportunity to comment on the NYC Agency Accessibility Plans website and publicized the site via its e-mail list, social media channels and its quarterly community meetings in early January.

The proposed Plan was also shared internally with DSS/HRA/DHS employees who were offered an opportunity to comment.

The Agency considered all comments posted publicly or sent to the ODA mailbox and made edits and additions where possible.

Glossary of Acronyms

- **ACCES-VR** – Adult Career and Continuing Education Services – Vocational Rehabilitation
- **ADA** – Americans with Disabilities Act
- **ASCII** – American Standard Code for Information Interchange
- **ASL** – American Sign Language
- **BCS** – Building Compliance System
- **CAB** – DSS ITS' Change Advisory Board

- **CAPS** – Coordinated Assessment and Placement System
- **CART** – Communication Access Realtime Translation
- **CDI** – Certified Deaf Interpreter
- **CIDNY** – Center for Independence of the Disabled in NY
- **CPD** – DHS Division of Capacity Planning and Development
- **CUNY LEADS** – City University of New York – Linking Employment, Academics Disability Services
- **DAFN** – Disability Access and Functional Needs
- **DCAS** – Department of Citywide Administrative Services
- **DHS** – Department of Homeless Services
- **DOITT** – Department of Information Technology and Telecommunications
- **DOJ** – U.S. Department of Justice
- **DSF** – Disability Service Facilitator
- **DSS** – Department of Social Services
- **EEO** – Equal Employment Opportunity Office
- **ERG** – Employee Resource Group
- **FCC** – Federal Communications Commission
- **FHA** – Fair Housing Act
- **HIPAA** – Health Insurance Portability and Accountability Act
- **HRA** – Human Resources Administration
- **HRS** – DSS Human Resources Solutions
- **HUD** – Department of Housing and Urban Development
- **ITS** – Information Technology Services
- **MOPD** – Mayor's Office for People with Disabilities
- **OCM** – DSS Office of Communications and Marketing
- **OCS** – DSS Office of Constituent Services
- **ODA** – DSS Office of Disability Affairs
- **OEI** – DSS Office of Equity & Inclusion
- **OLA** – DSS Office of Legal Affairs
- **OPDI** – DHS Office of Program Development and Implementation
- **OPPT** – DSS Office of Policy, Procedures and Training
- **OPWDD** – Office for People with Developmental Disabilities
- **ORIA** – DSS Office of Refugee and Immigrant Affairs

- **OSAHS** – HRA Office of Supportive/Affordable Housing & Services
- **OTI** – Office of Technology and Innovation
- **PII** – Partnership for Inclusive Internships
- **PPE** – Personal Protective Equipment
- **QA** – Quality Assurance
- **RA/RAR** – Reasonable Accommodation / Reasonable Accommodation Request
- **RFP** – Request for Proposal
- **SHS** – DHS Street Homeless Solutions
- **SLDC** – Systems Development Life Cycle
- **SPMI** – Serious and Persistent Mental Illness
- **SWA** – Steven Winter Associates Inc.
- **VRI** – Video Remote Interpretation
- **WCAG** – Web Content Accessibility Guidelines