

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



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General

Background

Local Law 12 of 2023 requires every New York City agency to develop and implement a five- year accessibility plan, in consultation with the Mayor's Office for People with Disabilities ("MOPD"). The legislation mandates that the accessibility plans outline the steps agencies are taking to "ensure that the agency's workplace, services, programs and activities are accessible to and accommodating and inclusive of persons with disabilities"¹ by improving physical, digital, and programmatic access, and providing effective communications for persons with disabilities. These efforts include, but are not limited to: any alterations or structural changes to facilities or premises that are owned and operated by the agency or contracted for use by the agency or otherwise under the agency's jurisdiction; any planned upgrades or investments in technology or tools that will improve accessibility within the agency or access to such agency's services and programs; and additional steps to make the agency's programs and services more accessible to and inclusive of persons with disabilities.

Agency Mission

The mission of the New York City Civil Service Commission ("CSC" or "Commission") is to be fair and impartial in deciding appeals and to assure that the treatment of civil service applicants and employees is consistent with civil service laws and the City's personnel rules.

In addition to hearing appeals from individuals, the Commission may conduct reviews and studies of personnel administration in City government.

Online Resources

CSC's proposed Five-Year Accessibility Plan, Grievance Procedure, and Website Accessibility Statement may be found on its <u>Accessibility webpage</u>.

¹ Local Law 12 of 2023, available at: intro.nyc/0682-2022



Accommodation Requests

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

A person requesting an accommodation for purposes of participation in an appeal at the Commission, including attendance as a member of the public, must request such accommodation sufficiently in advance of the proceeding in which the person wishes to participate to permit a reasonable time to evaluate the request. A request for accommodation must be submitted to the Commission at least five business days in advance of the proceeding.²

Members of the public who need assistance accessing a particular program or service, should contact Commission's DSF at (212) 615-8915 or customersvce@nyccsc.nyc.gov.

Contact Information

The contact information of CSC's Disability Service Facilitator ("DSF") is:

Disability Service Facilitator New York City Civil Service Commission One Centre Street, 2300 N New York, NY 10007 (212) 615-8915 customersvce@nyccsc.nyc.gov

The Commission's DSF is responsible for preparing and updating its Accessibility Plan.

² The Commission's rules governing reasonable accommodation requests and requests for interpreters may be found at <u>60 RCNY § 2-22 and § 2-10</u>, respectively.



Proposed Agency Plan

Physical Access

Implementation Timeframe 2024-2028

CSC's office space is located at 1 Centre Street, 2300 N, New York, NY 10007. This is a City-owned property managed by the NYC Department for Citywide Administrative Services (DCAS) which is responsible for ensuring the building meets all physical accessibility requirements.

While members of the public do not often visit our agency, the Commission's DSF will coordinate the Commission's EEO Officer and with DCAS to address any accessibility issues that arise. In the meantime, CSC will complete the Physical Access Self-Evaluation when it is provided by MOPD. The evaluation will inform future updates to the 5-year accessibility plan concerning's CSC's physical environment.

Digital Access

Implementation Timeframe: 2024-2028

The Commission will continue to strive to meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal and public facing websites. CSC's Web Accessibility Statement is posted on the its Accessibility webpage (<u>Website</u> <u>Accessibility Statement (nyc.gov</u>) in compliance with Local Law 12.

In addition, in Year 1 of the plan, CSC will complete the Digital Accessibility Self-Evaluation Tool provided by MOPD. The evaluation will inform future updates to the 5-year accessibility plan concerning the Commission's digital presence. CSC will continue to consult with the Office of Technology and Information and MOPD about the design of its website and its CaseMatters Internet Intake portal.

Programmatic Access and Effective Communications

Implementation Timeframe: 2024-2028

The Commission is committed to ensuring that members of the public have the opportunity for a full and fair review of their appeal. The Commission is mindful



that providing accessible service to people with disabilities is essential to the fair resolution of their appeal.

The overwhelming majority of CSC's interactions with the public are conducted electronically. Most appellants file their appeal either through the Commission's CaseMatters Internet Intake portal or by emailing the Commission directly, and the Commission manages its appeals almost exclusively by email and email attachment. Similarly, the Commission's discretionary hearings are currently conducted virtually. CSC will review these practices and systems as part of its Year 1 Digital Accessibility Self-Evaluation.

In addition, the Commission will require its staff undertake annual training on Disability Awareness and Etiquette. This training will assist Commission staff in its interactions with the public that occur at the Commission's offices and over the phone.

Finally, the Commission will continue to provide reasonable accommodations, including translation services, requested by appellants or members of the public. The Commission will also continue to hold practice hearing sessions for members of the public who have a scheduled hearing and are unfamiliar with remote meeting software.

Workplace Inclusion

Implementation Timeframe: 2024-2028

The Commission has developed and will implement and maintain a five-year accessibility plan that outlines the strategies and actions to identify and remove barriers for people with disabilities. Specifically, the Commission follows the Citywide EEO Policy in the DCAS Code of Conduct, and the Commission's EEO Officer provides the EEO Policy and Reasonable Accommodations process to all staff at least once a year. The Commission also reviews its internal policies on a regular basis to ensure compliance with relevant laws, rules, and regulations.



Consistent with the Citywide EEO Policy and relevant laws and rules, the Commission's EEO Officer provides documented individual accommodations based on the following:

- 1. Engaging in a cooperative dialogue with the employee/applicant requesting an accommodation.
- 2. Evaluating medical documentation to determine appropriate and effective accommodations that address the specific disability or condition.
- 3. Conducting regular reviews with employee to ensure that the accommodation put in place is addressing their needs.
- 4. If applicable, providing a reason for a denial and the process to request an appeal.

In addition, within the first two years of this plan, the Commission will make the Disability Etiquette & Awareness Training on Citynet part of the agency's mandatory training cycle.

Methodology

The Commission's 5-year accessibility plan was developed by the Commission's DSF in consultation with its EEO Officer and staff. The Commission has also periodically consulted with MOPD about the scope of its 5-year accessibility plan. The Commission will continue to conduct self-evaluations as part of the development of this accessibility plan.

Budget and Resource Allocation

CSC is one of the city's smallest agencies, with a modest operating budget that is almost entirely dedicated to personnel. While it has a very small budget outside of personnel matters, the Commission is committed to allocating money as funding permits for accessibility improvements during the plan period depending on future budgetary needs and circumstances.



Appendix A

Civil Service Commission Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of the Civil Service Commission ("Commission") to comply with all applicable laws including, but not limited to the Americans with Disabilities Act ("ADA"), Rehabilitation Act, the New York State Human Rights Law, and the New York City Human Rights Law. The Commission does not discriminate on the basis of disability in the operation of its programs, services and activities and strives to be welcoming to and inclusive of people with disabilities.

Employment related complaints for employees and applicants for employment seeking a reasonable accommodation are covered under the <u>City's EEO Policy</u>.

Any member of the public who requires an auxiliary aid or service for effective communication, or a reasonable modification of policies or procedures in order to participate in our programs, services or activities (involving matters other than employment) is invited to direct their needs and preferences to the Commission's Disability Service Facilitator by email, phone or mail:

Disability Service Facilitator New York City Civil Service Commission One Centre Street, 2300 N New York, NY 10007 (212) 615-8915 <u>customersvce@nyccsc.nyc.gov</u>

Requests should be made as soon as possible but no later than five (5) business days before the scheduled program, service, or activity. Questions, concerns or requests for additional information may be directed to the Commission's Disability Service Facilitator.

If you believe you have been denied an auxiliary aide or service or a reasonable modification of policies or procedures to participate in programs, services, or



activities provided by the Commission, please see our grievance procedure, below.

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

The grievance procedure may be used by any member of the public who wishes to file a grievance alleging discrimination on the basis of disability in the provision of services by the Commission.

The grievance should be in writing and contain information about the alleged discrimination:

- 1) The name, address, and telephone number of the grievant; and
- 2) The location, date, and description of the complaint or alleged violation of the ADA, the Rehabilitation Act, the New York State Human Rights Law, or the New York City Human Rights Law.

Alternative means of filing a grievance, such as an in-person interview or an audio recording of the grievance, may be made available for persons with disabilities upon request.

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

Disability Service Facilitator New York City Civil Service Commission One Centre Street, 2300 N New York, NY 10007 (212) 615-8915 <u>customersvce@nyccsc.nyc.gov</u> (Please include "Grievance" in subject line.)

Within **thirty (30)** calendar days after receipt of the grievance, the Disability Service Facilitator or designee will contact the grievant to discuss the grievance and possible resolutions.



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

The grievant may appeal the Commission's decision within **thirty (30)** calendar days of receipt of the Commission's response. The appeal should be sent to:

Grievance Appeals Officer New York City Civil Service Commission One Centre Street, 2300 N New York, NY 10007 appeals@nyccsc.nyc.gov

The appeal should be submitted in writing. Alternative means of filing an appeal, such as an in-person interview or an audio recording of the grievance, may be made available for persons with disabilities upon request.

The Commission's response to the appeal will be provided to the grievant within **sixty (60)** days following receipt of the request for the appeal. All responses by the Commission will be in writing or, where appropriate, in a format accessible to the grievant. All written grievances, appeals, and responses received in connection with a grievance made to OATH, will be retained for at least **three (3)** years. This document is available in alternative formats, including large print, audio recording, and Braille, from the Disability Service Facilitator upon request.



Appendix B

Website Accessibility Statement

The New York City Civil Service Commission 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 Accessibility</u> <u>Feedback Form</u>.

If you need assistance accessing a particular program or service, please reach out to the Civil Service Commission's Disability Services Facilitator at 212-615-8915 or <u>customersvce@nyccsc.nyc.gov</u>.

Assessment Approach

The New York City Civil Service Commission assesses the accessibility of its digital content through self-evaluation.

Date

This statement was created on 02/28/2023.