



Department of Investigation

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

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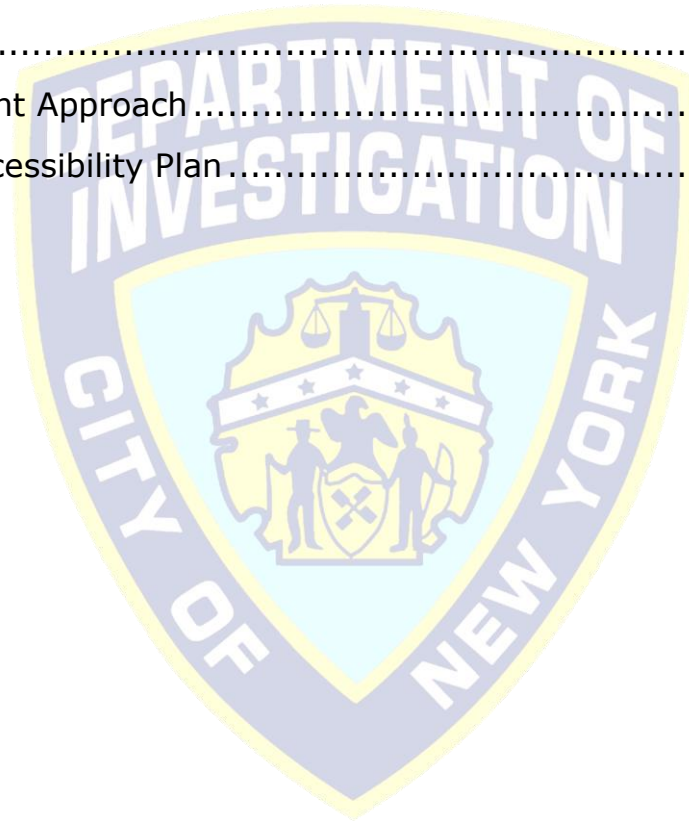
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Background

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.

Statement of Commitment

The New York City Department of Investigation (“DOI” or “Department”) believes in an equitable, diverse, and inclusive environment. DOI is committed to providing persons with disabilities with access to the Department’s services; to identifying, preventing and removing barriers to accessibility; and to meeting accessibility requirements in a manner that respects the dignity and independence of persons with disabilities.

Consistent with the purpose of the legislation, the New York City Department of Investigation strives to use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- Receipt of complaints, investigations and other Department services are provided in a manner that respects the dignity and independence of persons with disabilities to enable them to obtain, use or benefit from Department resources and/or services;

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

- Persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from Department resources and/or services;
- When communicating with a person with a disability, the Department will do so in a manner that considers the person's disability and preferred method of communication;
- Planned installation of assistive listening systems so that persons with disabilities may use assistive devices to support access to Department resources and services; and
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.

Agency Mission

DOI serves as the City's independent inspector general. Pursuant to the City Charter, DOI reports to the Mayor and the City Council, but operates independently of both. DOI's staff consists of Inspectors General, investigators, attorneys, forensic auditors, computer forensic specialists and administrative personnel. The City Charter and various Executive Orders empower DOI to carry out its mission of attacking corruption comprehensively through systemic investigations that lead to arrests, and recommendations that result in reforms and preventive controls that improve the way the City operates and delivers services to all New Yorkers. DOI's jurisdiction includes all City agencies and employees, third parties who contract with the City, and individuals who receive City services. DOI's major functions include investigating and referring for criminal prosecution cases of fraud, corruption and other illegal activities by City employees, contractors and others who do business with the City. As part of its investigations, DOI identifies systemic corruption vulnerabilities and recommends improvements to reduce the City's exposure to corruption, fraud, waste and abuse, and improve the function of City agencies. In addition, DOI investigates the backgrounds of City workers who earn more than \$125,000 annually and those selected to work in sensitive City jobs; conducts checks on companies who are awarded contracts with the City of \$250,000 or more; and acts as the investigative arm of the Conflicts of Interest Board ("COIB").

Contact Information

DOI's Operations Division is responsible for preparing and updating the Department's Accessibility Plan.

Online Resources

DOI's website contains useful information for individuals with disabilities, including:

1. Non-discrimination Policy and Notice of Rights
2. Grievance Procedures
3. Website Accessibility Statement
4. Five-Year Accessibility Plan

To access DOI's online accessibility resources, please visit nyc.gov/site/doi/contact/doi-office-accessibility.page. A copy of this webpage is appended to this plan as Appendix A.

Accommodations 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. Employees and/or members of the public who need assistance accessing a particular program or service, should contact DOI's DSF Shayvonne Nathaniel at (212) 825-5939 or Accessibility@doi.nyc.gov.

Availability

DOI's accessibility plan is publicly posted at [nyc.gov/assets/doi/contact/DOI Five Year Accessibility Plan 2024-2028.pdf](https://nyc.gov/assets/doi/contact/DOI_Five_Year_Accessibility_Plan_2024-2028.pdf).

Individuals may request a copy of this document in an accessible alternative format by contacting the DSF at Accessibility@doi.nyc.gov or (212) 825-

5939.

Executive Summary

DOI is committed to equity both in its workforce and in its service to the public. To comply with the ADA and Local Law 12 of 2023, DOI has designed this accessibility plan to identify priority areas to remove barriers to accessing DOI's services and to empower its workforce to better serve New Yorkers. This plan addresses access in the following areas: (1) Physical Access; (2) Digital Access; (3) Programmatic Access; (4) Communications; and (5) Workplace Inclusion.

The purpose of this plan is to outline how DOI will identify, remove, and prevent barriers for persons with disabilities and comply with the ADA and other legal requirements. This plan was informed by consultations with DOI's EEO Office, which, through its role in answering disability-related inquiries and processing reasonable accommodations requests, has a strong understanding of past, present, and future accessibility issues. DOI has developed this plan to address these issues, remove barriers, and prevent creation of new ones in the areas identified above. A proposed version of this plan was circulated and received one public comment. In addition, MOPD posted the proposed plan and notice of opportunity to comment on the NYC Agency Accessibility Plans website and publicized the site via its email list, social media channels and at its quarterly community meeting in early January. While DOI designed this plan to be comprehensive, a more thorough assessment will be required in some instances to identify effective long-term solutions and implementation strategies. As such, this plan will continue to evolve with the goal of achieving our accessibility objectives and keeping pace with changing accessibility standards and requirements.

Agency Plan

Physical Access

Implementation Timeframe: 2024-2028

DOI's leased office space is located at 180 Maiden Lane, New York, NY 10038. DOI has begun implementation of several physical access improvements within its office space, including:

1. Accessible doors that automatically open and close.
 - DOI has already installed 3 accessible doors in a hallway, pantry, and accessible bathroom on one floor of DOI's office space.
 - DOI plans to install 21 additional accessible doors in the same and other appropriate areas on all other floors.
2. Assistive listening systems.
 - DOI has already equipped one conference room with an audio induction loop assistive listening system.
 - DOI plans to install additional assistive listening systems in two interview rooms.
3. Accessible self-service kiosks.
4. Braille signage.
 - DOI has already installed braille signage in all elevator banks, bathrooms and numbered offices.
 - DOI plans to install additional braille signage in all places where there is directional signage.

In addition to the above, the Department will continue to establish plans to make its facilities more accessible. The Department will take appropriate steps to prevent service disruptions to accessible parts of its public spaces. In the event of a service disruption, we will notify the public of the service disruptions and alternatives available.

Digital Access

Implementation Timeframe: 2024-2028

DOI will continue to strive to meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal and public facing websites. DOI's Web Accessibility Statement is posted on the Department's Accessibility webpage ([nyc.gov/site/doi/contact/doi-office-accessibility.page](https://www.nyc.gov/site/doi/contact/doi-office-accessibility.page)) in compliance with Local Law 12.

Programmatic Access

Implementation timeframe: 2024-2028

Accessibility and inclusion of people with disabilities is a core value for DOI. Training is provided in a way that best suits the duties and needs of employees and anyone utilizing DOI's training space and or academy.

DOI is also committed to providing training on the requirements of accessibility as they apply to people with disabilities. Accessibility training for all employees will be launched in 2024.

DOI has taken or will take the following steps to ensure employees are provided with the training needed to meet current standards and legislation:

1. Provide educational or training resources in an accessible format that considers the accessibility needs of a person with a disability.
2. Ensure new employees and volunteers complete Disability Etiquette and Awareness training within 30 days of employment or placement.
3. Require all employees to complete Disability Etiquette and Awareness training at least every two years.
4. Keep and maintain a database of the training participant's names and dates of completion.

Effective Communications

Implementation timeframe: 2024-2028

Although DOI does not have customers in the same way that many other agencies do, we do have complainants and visitors to our offices. The

Department is committed to providing accessible service to people with disabilities and making our information and communications accessible to people with disabilities. DOI is similarly committed to ensuring its digital content is accessible to and usable by people with disabilities.

To achieve greater digital accessibility and remove barriers to persons with disabilities, DOI will:

1. Upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs.
2. Provide, upon request, accessible formats and communication supports for receiving and responding to feedback from persons with disabilities.
3. Organize professional training sessions, including those offered by the Department of Citywide Administrative Services (DCAS).

Workplace Inclusion

Implementation Timeframe: 2024-2028

Accessibility Policies and Plans

The Department has developed and will implement and maintain a five-year accessibility plan that outlines the strategies and actions to identify, prevent and remove barriers for people with disabilities. Specifically:

1. The Department has incorporated the Citywide EEO Policy into the DOI Code of Conduct and DOI Employee Handbook. DOI's current policy requires all employees to read, review and sign the Code of Conduct and Employee Handbook, upon hire, and as part of an annual review process for all employees.
2. The Department will review, assess, and amend, where necessary, its internal policies and procedures to incorporate accessibility equity into DOI's core operations with respect to DOI employees and members of the public with whom DOI interacts.
3. DOI reviews internal policies on a regular basis and will integrate updates and/or amendments regarding accessibility to relevant laws, rules and regulations into the Code of Conduct and Employee Handbook. In conjunction with the commencement of its 5-year accessibility plan,

DOI plans to do an accessibility review of agency policies to ensure they address any accessibility issues.

Employment Standard and Reasonable Accommodations

DOI is committed to ensure our recruitment, assessment and on-boarding processes are fair and accessible to all applicants and potential employees. DOI will also continue to provide reasonable accommodations to employees and applicants with disabilities.

The Department has taken the following steps to ensure compliance with this standard:

1. Specifying that accommodations are available for employees and applicants with disabilities.
2. When making offers of employment, successful candidates are notified that accommodations are available upon request to DOI's EEO Office.
3. EEO arranges interviews, if applicable, for requested accommodation(s) in a timely manner, in a format/forum that is preferable to the employee requesting/requiring the accommodation.
4. EEO informs employees of policies used to support employees with disabilities and notifies employees when there is a change in policy, as soon as practicable.

Documented Individual Accommodation Plans

Consistent with the Citywide EEO Policy and relevant laws and rules, DOI EEO shall produce and provide documented individual accommodations based on the following practices:

1. Cooperative dialogue with the employee or applicant requesting/requiring the accommodation;
2. External medical evaluations to determine appropriate and effective accommodations that address the specific disability or condition;
3. High level of privacy;
4. Regular review and updates, where applicable;
5. Reasons for denial, if applicable;
6. The means of providing the accommodation in a format that considers

the needs of the employee;

7. If required, include individualized workplace emergency response information.

Accessible Emergency Information

The Department has created a process for documenting challenges with accessibility in addition to recording and providing accommodation for individualized accessible emergency response information. DOI has provided and will continue to provide individual emergency response plans to employees with disabilities in order to ensure such employees can be safely evacuated from DOI premises in the event of emergency. If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, the workplace emergency response information will be given to the designated employee(s) responsible for coordinating search and evacuation of Department employees. An individual emergency response plan shall include the employee's:

1. Location
2. Type of disability, if applicable
3. Special equipment required for safe transport and evacuation

The Department will continue to review the individualized workplace emergency response plans to ensure the plans are updated and accurate.

Return to Work

The Department is committed to developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability. The Department has developed and maintained a return to work process for our employees who have been absent from work due to a disability and require disability related accommodations in order to return to work. The process includes the steps DOI EEO and Operations (Human Resources and Facilities) takes to facilitate the return to work process which utilizes the documented individual accommodation plans.

Performance Management, Career Development and Redeployment

The Department is committed to ensuring that the accessibility needs of

employees with disabilities are taken into account with regard to performance management, career development and redeployment processes.

The Department will review and update Human Resources policies and procedures taking the following elements into consideration:

1. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be taken into account when using performance management processes.
2. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be taken into account when providing career development and advancement opportunities.
3. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be taken into account when redeploying employees with disabilities.

Methodology

Beyond meeting ADA compliance requirements, DOI is committed to identifying priorities to increase accessibility and inclusion. The Department has identified the following goals to remove and prevent accessibility barriers over the coming years:

1. Review existing accessibility policies and procedures and update, where necessary.
2. Gather staff demographic data to determine representation of people with disabilities and other diverse groups within DOI.
3. Increase employment and other opportunities for under-represented populations.
4. Commit to filing an accessibility report based on stated deadlines in § 23-1004.

DOI consulted with its EEO Office to identify the access issues described in this plan. The EEO Office, through the reasonable accommodations process, interacts with individuals with disabilities and has both a historical and a present understanding of disability-related inquiries and needs. This information was critical to informing DOI of the issues that should be

addressed as part of this plan and will further serve as a guide for future amendments and additions to the plan. DOI circulated a proposed version of this plan for public comment and received one comment. DOI will continue to refine this plan to meet the evolving accessibility needs of its workforce and the public.



Appendix A

DOI Five-Year Accessibility Plan DOI Accessibility Webpage

Department of Investigation Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of Department of Investigation (“DOI”) 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. DOI does not discriminate on the basis of disability in the operation of its programs, services and activities and strives to be welcoming to and inclusive of people with disabilities.

Employment related complaints for employees and applicants for employment seeking a reasonable accommodation are covered under the City’s EEO Policy which can be found at nyc.gov/assets/dcas/downloads/pdf/agencies/nyc_eeo_policy.pdf.

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

Shayvonne Nathaniel
New York City Department of Investigation
180 Maiden Lane, 20th Floor
New York, NY 10038
(212) 825-5939
Accessibility@doi.nyc.gov

Requests should be made as soon as possible but no later than three (3) business days before the scheduled program, service or activity. Questions, concerns or requests for additional information may be directed to DOI’s Disability Service Facilitator.

If you believe that you have been denied an auxiliary aid or service or a reasonable modification of policies or procedures that you need in order to participate in programs, services or activities provided by DOI please see DOI's grievance procedure below.

Department of Investigation's Grievance Procedure for Members of the Public Alleging Discrimination Based on Disability

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

- the name, address, telephone number and/or email of the grievant and
- information about the alleged discrimination, such as the location, date, and description of the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law.

"Grievance" is the term for the allegation filed with DOI by a member of the public.

"Grievant" is the term for the person alleging discrimination in the grievance.

Notice: The following grievance and grievance appeal procedures are for reporting of disability-based discrimination in the provision of services by DOI only. All other complaints to DOI must be made via DOI's Complaint Unit at: nyc.gov/site/doi/contact/online-complaint-form.page.

When and How to File a Grievance

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

Shayvonne Nathaniel
New York City Department of Investigation
180 Maiden Lane, 20th Floor
New York, NY 10038
(212) 825-5939
Accessibility@doi.nyc.gov (Please include "Grievance" in subject line.)

The grievance may be filed in one of two ways:

1. By submitting the grievance in writing by mail or email using the above address; or
2. Upon request, by an alternative means, such as an in-person interview or an audio recording, describing the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law. A request for an alternative means of filing may be granted as an accommodation for a grievant with a disability.

Timeline Following Filing of Grievance

Within fifteen (15) calendar days after receipt of the grievance, the Disability Service Facilitator or designee will contact the grievant to discuss the grievance and possible resolutions.

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

When and How to File an Appeal

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

The appeal should be mailed to:

Commissioner Jocelyn E. Strauber
New York City Department of Investigation
180 Maiden Lane, 24th Floor
New York, NY 10038

The appeal may be filed in one of two ways:

1. By submitting the appeal in writing and by mail using the above address;
or

2. Upon request, by an alternative means, such as an in-person interview or an audio recording, describing the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law. A request for an alternative means of filing may be granted as an accommodation for a grievant with a disability.

Timeline Following Filing of Appeal

DOI's response to the appeal will be provided to the grievant in writing within sixty (60) days following receipt of the appeal. Grievants may request the response in an additional format accessible to them, such as large print, Braille, or audio recording. This response will address the appeal, describe DOI's decision, and offer options for substantive resolution of the appeal, where applicable.

All written grievances, appeals, and responses in connection with a grievance made to DOI will be retained for at least three (3) years.

Note: Upon request to the Disability Service Facilitator, this page can be made available in an alternative format.

Website Accessibility Statement

DOI 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 [Website Accessibility Feedback Form](#).

If you need assistance accessing a particular program or service, please reach out to DOI's Disability Services Facilitator at (212) 825-5939 or Accessibility@doi.nyc.gov.

Assessment Approach

DOI assesses the accessibility of its digital content through self-evaluation.

Five-Year Accessibility Plan

DOI developed a Five-Year Accessibility Plan in accordance with [Local Law 12 of 2023](#). DOI's Plan can be viewed at nyc.gov/assets/doi/contact/DOI_Five_Year_Accessibility_Plan_2024-2028.pdf.

