



# Department of Youth and Community Development

Five-Year Accessibility Plan (2024-2028)

Pursuant to New York City Local Law 12 of 2023

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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 commands 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. These activities encompass but are not restricted to: any modifications or structural adjustments made to buildings or properties that the agency owns and manages, hires out for its use, or that fall under the agency’s purview; any upcoming changes or expenditures on equipment or technology that will increase accessibility inside the organization or access to its services and programs; and extra actions to increase the agency’s programs’ accessibility to and inclusion of people with disabilities.

## Statement of Commitment

At the New York City Department of Youth and Community Development (DYCD), we are committed to ensuring an inclusive and accessible environment for all our employees and our program and service participants. That means we’re committed to reducing barriers to accessibility for persons with disabilities, to have equal access to our resources and opportunities including in the workplace, and in the communities we serve. We understand that accessibility is essential to prevent discrimination and create a more inclusive and diverse workplace, which has been known to have positive effects on employee morale and productivity. Through this five-year accessibility plan, we are committing to taking proactive steps toward reducing or removing existing barriers.

## Agency Mission

The New York City Department of Youth and Community Development (DYCD) invests in a network of community-based organizations and programs to alleviate the effects of poverty and to provide opportunities for New Yorkers and communities to flourish.

DYCD supports New York City youth and their families by funding a wide range of high-quality youth and community development programs, including:

- After School
- Community Development
- Community & Personal Safety
- Family Support
- Literacy Services
- Youth Services
- Youth Workforce Development

## Equity Statement

DYCD's Equity Statement serves to provide background and rationale to support our values, and to make our agency's position clear to anyone reading it.

The NYC Department of Youth and Community Development (DYCD) strives to alleviate the effects of poverty and provide opportunities for New Yorkers to reach their full potential. We acknowledge that institutional racism and discrimination have been and remain significant drivers of poverty and inequities in New York City neighborhoods. We recognize the role that the policies and practices of systems and institutions, including NYC government agencies such as DYCD, may play in perpetuating structural inequities. In response, we commit to evaluate internal and external DYCD policies and practices that have allowed structural inequities to persist, which can inform our goal of equitable implementation of operational, administrative, and programmatic functions, and distribution of financial resources.

We are committed to the goal of becoming an anti-racist city agency, recognizing this will be a journey and commitment that requires sustained efforts of analysis and accountability. As a learning organization, we will hold ourselves accountable and adhere to our Guiding Principles. When we make mistakes along the way, we will acknowledge them, adapt, and continue to move forward. Our vision is a New York City in which everyone flourishes, and outcomes are not determined by race, age, disability, ethnicity, gender, gender identity, immigration status, income, marital status, national origin, religion/creed, or sexual orientation.

## Contact Information

### ADA Coordinator/Disability Service Facilitator

Members of the public who have issues accessing our programs or services can contact the Disability Service Facilitator:

Ruma Debi  
New York City Department of Youth and Community Development  
123 William Street, 17th Floor  
New York, NY 10038  
Phone: (646) 343-6722  
Email: [DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.nyc.gov)

### Accommodation Requests

DYCD's Equal Employment Opportunity Office is responsible for preparing and updating the Department's Accessibility Plan. 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 DYCD's DSF Ruma Debi at (646) 343-6722 or [DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.nyc.gov).

### Online Resources

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

- a. [Notice of Rights under the ADA](#)
- b. [Grievance Procedures](#)
- c. [Website Accessibility Statement](#)
- d. [DYCD Five Year Accessibility Final Plan 2024.docx](#)
- e. [Contact the ADA Disability Coordinator](#)



To access DYCD’s online accessibility resources, please visit [our website](#). 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](#) or by contacting the DSF Ruma Debi.

If you need assistance accessing a particular program or service, please reach out to the DSF Ruma Debi, see contact information above.

## Alternative Formats

You can request alternative formats for this plan and a description of our feedback process. To request an alternative format please contact the DSF Ruma Debi at (646) 343-6722 or email at: [DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.nyc.gov). We will respond to requests for other formats as soon as we can.

## Executive Summary

DYCD is committed to ensuring an inclusive and accessible environment for all our employees, our program participants, and anyone seeking to participate in our activities. To comply with the ADA and Local Law 12 of 2023, this Five-Year Accessibility Plan has been developed by DYCD’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.

The Office of Equal Employment Opportunity developed the Accessibility Plan with input from staff throughout the agency. DYCD utilized the self-evaluation tools which were provided by the Mayor’s Office for People with Disabilities (MOPD). The results from the self-evaluation helped us understand current accessibility strategies and areas for improvement. This analysis informed the development of this Accessibility Plan, which aims to address issues of exclusion and remove barriers for those with visible and invisible disabilities.

This Accessibility Plan lays out what DYCD has done so far to be inclusive of people with disabilities and it lays out the steps that DYCD will undertake to address opportunities and gaps identified over the next few years. This plan also identifies areas for additional evaluation.



## Agency Plan

### Physical Access

The Department of Youth and Community Development operates out of the following buildings:

**City-Owned Building:**

2 Lafayette Street, New York, NY 10007  
DYCD occupies floors 14 and 18 to 22.

**Leased Office Space:**

123 William Street, New York, NY 10038  
DYCD occupies floors 17 and 18.

DYCD is responsible for the agency's demised areas (the offices themselves). DCAS is responsible for the common areas of 2 Lafayette Street, a city-owned landmark building. Pursuant to DCAS's plan, DCAS has several construction projects planned and in progress over the next five years that will include accessibility upgrades to our facilities, including wheelchair lift replacements, restroom upgrades, elevator upgrades, and other building renovations that will make our spaces ADA-compliant.

DYCD's main entrance for visitors (located at 2 Lafayette Street) is wheelchair accessible. Upon entering the building, visitors have access to three elevators that provide access to all floors for events, programs, and meetings. Should any physical access issues be identified in the future, DYCD will work with DCAS to address them.

DYCD's two locations have some accessible features:

- Both buildings have elevators that provide access to each floor.
- Both buildings have bathrooms with accessible stalls.
- At 2 Lafayette Street the elevator banks, bathroom, and pantry have braille signage. At 123 William Street, the elevator banks have braille signage.
- Receptionists are available at the front desks (during key business hours) on the visitors' floors for each building (2 Lafayette Ave, 14<sup>th</sup> & 21<sup>st</sup> Floors and 123 William Street, 17<sup>th</sup> Floor) and can provide assistance with opening the doors, as needed.

## **Digital Access (Implementation timeframe: 2024 – 2028)**

DYCD uses a variety of information and communication technologies for both our internal and public facing websites. DYCD is committed to attaining compliance with Web Content Accessibility Guidelines 2.1 Level AA for both our public-facing websites and internal intranet. [DYCD's Web Accessibility Statement](#) is posted on the Department's Accessibility webpage in compliance with Local Law 12.

DYCD identified Mark Benavides as a Digital Inclusion Officer (DIO) to act as the main point of contact on digital accessibility issues within the agency. The Digital Inclusion Officer will work closely with the IT Department and the Communications Team and be responsible for tracking our continued compliance with Local Law 12.

DYCD has conducted a digital access self-assessment to identify any digital accessibility obstacles in the agency's digital platforms and digital communications. The DYCD Application Development Team will analyze any accessibility issues for our public facing websites. In the next two years (2024-2025) the agency aims to resolve any remaining high impact accessibility issues found on public facing websites and applications.

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

DYCD provides programs and services to our communities through non-profit organizations and contractors. DYCD considers how to serve people with disabilities in program development and design. DYCD uses Department of Education data on students with disabilities and other demographic data to identify schools and areas with a high number of people with disabilities where services can be provided. In the current city fiscal year (2024), DYCD is serving over 3,300 persons with disabilities through afterschool programs and community programs. Of these, over 1,700 are participating in the Compass programs (afterschool programs in elementary, middle and high schools). In addition, this past summer over 4,000 youth with disabilities participated in the Summer Youth Employment Program.

DYCD will continue to seek opportunities to expand opportunities for all, including those with disabilities. In 2024, DYCD will conduct self-evaluation of DYCD's programs, to further identify opportunities for removing barriers and increasing access for people with disabilities. DYCD will use the results of the self-evaluation to inform program design and the development of future solicitations for our programs.

All DYCD-funded programs serve youth with disabilities. Some of DYCD's programs are funded specifically to serve students with disabilities, and DYCD also funds organizations which specialize in serving youth with disabilities. DYCD created a Disability Resource Guide to help CBO staff, youth and families access support in a range of areas, from education and housing, mental health and professional development.

DYCD providers are expected to provide services that are inclusive of the diverse communities we serve. To support our providers, in 2024 DYCD will explore training opportunities for providers.

### **Effective Communications (Implementation timeframe: 2024-2028)**

DYCD is committed to making sure our information and how we communicate is accessible to people with disabilities. This includes our digital content. The following steps have been taken:

- DYCD has begun developing templates for accessible and inclusive communication with the public.
- DYCD has developed training on digital accessibility and inclusive engagement. This includes creating documents using plain language, high color contrast, alternative text, structuring a document for screen reader navigation, as well as strategies to be inclusive at in-person events.
- DYCD began training key staff who are involved in public outreach and engagement.

Starting in 2024, DYCD will:

- a. Expand staff training on inclusive and accessible engagement. This includes both digital content such as outreach flyers and presentations, as well as in-person events.
- b. Upon request, provide or arrange for the preparation of accessible formats and communication support to persons with disabilities in a timely manner, considering the person's accessibility needs.
- c. Organize additional professional training sessions, including those offered by the Department of Citywide Administrative Services (DCAS).

- d. Our goal for this five-year accessibility plan is to ensure that any form of communication should establish an identity of diversity and inclusivity.
- e. Include images of persons with physical disabilities in brochures, videos, and the website.
- f. Explore having ASL interpreters on contract and develop an internal process, to facilitate these requests for public events.

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

DYCD has developed and will implement and maintain this five-year accessibility plan that outlines the policies and actions to identify, prevent and remove barriers for people with disabilities.

- a. DYCD incorporated the Citywide EEO Policy into the DYCD Code of Conduct and DYCD Employee Handbook. DYCD's current policy requires all employees to read, review and sign the Code of Conduct and Employee Handbook, upon hire.
- b. DYCD will review, assess, and amend, where necessary, its internal policies and procedures to incorporate accessibility and equity into DYCD's operations with respect to DYCD employees and members of the public with whom DYCD interacts.
- c. DYCD 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.

### **Employment Standard and Reasonable Accommodations**

DYCD is committed to ensuring our recruitment, assessment and on-boarding processes are fair and accessible to all applicants and potential employees. DYCD will continue to provide reasonable accommodation to employees and applicants with disabilities.

- a. DYCD review all job descriptions to ensure they are disability inclusive.
- b. We are also executing a strategy to recruit people with disabilities sharing job vacancy notices with the Mayor's Office for People with Disabilities via [NYC: At Work](#).

- a. Continue to create awareness and provide training on “Unconscious Bias” to staff. Additionally, DYCD will continue to educate hiring managers about the [55-a Program](#) and the benefits of hiring individuals with disabilities.
- b. Review application and selection processes to ensure reasonable accommodation is available and accessible at all stages of the recruitment and hiring process.
- c. When we have an opportunity to hire interns or fellows, we will explore programs for people with disabilities such as the Partnership for Inclusive Internships.
- d. During the first year of the plan, we will be conducting training for all managers and supervisors on the Reasonable Accommodation process.

***Reasonable Accommodation (Documented Individual Accommodation Plans)***

DYCD follows the guidance from DCAS’s Reasonable Accommodation Procedural Guidelines, the EEO Officer speaks to person requesting a reasonable accommodation (RA) to discuss the nature of the RA request and what kind of accommodations they are seeking. All conversations and documentation provided are confidential, and employees are informed of this at the very beginning of a reasonable accommodation request process.

Starting in 2024 and continuing through to 2028, DYCD will:

- a. Review its accommodations policy and processes to make the process easier to understand for staff seeking accommodation.
- b. Train managers in their role in hiring, onboarding, accommodating, and supporting people with disabilities in the workplace. This includes when making offers of employment, successful candidates are notified that accommodation is available upon request to DYCD’s EEO Office.
- c. Continue to share that reasonable accommodation is available for employees and applicants with disabilities.
- d. Responds to requested accommodation(s) in a timely manner, in a format/forum that is preferable to the employee requesting/requiring the accommodation.
- e. Informs employees of policies used to support employees with disabilities and notifies employees when there is a change in policy, as soon as practicable.

## **Accessible Emergency Information**

DYCD maintains individualized workplace emergency plans for employees who require accommodation for a disability. Additionally, the agency also informs new employees of the availability of such plans and updates these plans as necessary. DYCD has provided and will continue to provide individual emergency response plans to employees with disabilities to ensure such employees can be safely evacuated from DYCD premises in the event of emergency. DYCD will continue to review the individualized workplace emergency response plans to ensure the plans are updated and accurate. DYCD staff are trained in what to do in the event of a fire or other emergency with respect to staff and others with disabilities and functional needs.

## **Professional Development & Training**

There are multiple groups at DYCD responsible for professional development and training. The Compliance & Mandated Trainings Unit at DYCD ensures that all mandated training, including on disability and accessibility, is available in a manner that is consistent with a barrier-free workplace. The following mandated trainings are required for all employees:

- Require Unconscious Bias Training for All Employees
- Disability Etiquette and Awareness training

DYCD's Compliance & Mandated Trainings Unit maintains a database of the training participant's names and dates of completion.

In addition, there are other groups involved in providing training and professional development opportunities. The Diversity, Equity & Inclusion Office provides training on inclusive engagement and digital accessibility, as well as leads the Mentoring Leaders Program.

DYCD is committed to expanding training on accessibility and the legal requirements to be inclusive of people with disabilities. DYCD will work to provide educational or training resources in an accessible format that considers the needs of participants and to ensure employees are provided with the training needed to meet current standards and legislation.

## Methodology

DYCD is committed to developing policies that respect and promote the dignity and independence of persons with disabilities. In order to create this plan, DYCD's Office of Equal Employment Opportunity worked with the Agency's Chief Equity & Inclusion Officer and the Legal team. The Agency's DSF attended webinars held by MOPD on various topics.

MOPD provided city agencies self-evaluation tools to assist in the development of this plan to comply with various requirements under Title II of the ADA and various local laws. Agency's DSF used these tools to assess and identify accessibility issues in its physical locations, digital content, programs and services, communications, and workplace by conferring with other divisions in the agency including Human Resources, EEO, Legal and IT. The results of the self-evaluation helped identify the access issues that are discussed in this plan.

DYCD did not consult with people with disabilities outside of MOPD in creating this plan, however, the EEO Office, through the reasonable accommodation process, interacts with individuals with disabilities and has both a historical and a present understanding of disability-related inquiries and needs. Employees are encouraged to report barriers that they have identified for themselves or others by reaching out to the DYCD's EEO Office. A proposed plan was circulated for public comment, but no comments were received.

## Conclusion

DYCD recognizes that improving accessibility is a work in progress, we are committed to continuing the work that is already ongoing. Developing and releasing the first five-year accessibility plan, in consultation with the Mayor's Office for People with Disabilities ("MOPD"), is an important milestone on the road to reaching a barrier-free organization. Also, implementing this plan represents an opportunity to align with our agency's mission and vision and commitment to being a leader in accessibility and to ramp up organization-wide efforts to achieve this goal.

## Glossary

**Accessibility:** The design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities, to access them.

**Accommodation:** Any change in the working environment that allows a person with functional limitations in their abilities to do their job.

**Alternative Format:** This refers to the conversion of printed text and audio and video files into formats that can be accessed more easily by persons with disabilities.

**Barrier:** Anything that might hinder people with disabilities full and equal participation. Barriers can be physical, architectural, technological, or attitudinal, based on information or communications, or can be the result of a policy or procedure.

**Braille:** a form of written language for blind people, in which characters are represented by patterns of raised dots that are felt with the fingertips.

**Disability:** Any impairment, functional limitation, or difference in physical, mental, intellectual, cognitive, learning, sensory, or communication ability that, when combined with a barrier, hinders a person's full and equal participation. Disabilities can be permanent, temporary, or can change over time.

**Inclusion:** These are practices or policies to ensure equal access to opportunities and resources for those who might otherwise be excluded or marginalized. This includes people with physical or cognitive disabilities and other minority groups.

**Web Content Accessibility Guidelines (WCAG):** This is a standard for digital accessibility. These guidelines are the basis of most accessibility regulations worldwide. They can be applied to all current and future digital technologies.

## Appendices

1. Policy Prohibiting Discrimination Against People with Disabilities in Access to Services
2. Grievance Procedure for Members of the Public Alleging Discrimination Based on Disability
3. Website Accessibility Statement
4. Five-Year Accessibility Plan Review and Input



## Appendix 1: Policy Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of the Department of Youth and Community Development 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. DYCD 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](#).

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 DYCD's Disability Service Facilitator by email, phone or mail:

Ruma Debi  
New York City Department of Youth and Community Development  
123 William Street, 17th Floor  
New York, NY 10038  
(646)343-6722  
[DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.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 the DYCD 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 DYCD please see DYCD's grievance procedure below.

## **Appendix 2: 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, activities, programs, or benefits by DYCD may file a grievance with DYCD 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, NY State Human Rights Law, or NYC Human Rights Law.

“Grievance” is the term for the allegation filed with DYCD by a member of the public.

“Grievant” is the term for the person alleging discrimination in the grievance.

### **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:

Ruma Debi  
New York City Department of Youth and Community Development  
123 William Street, 17th Floor  
New York, NY 10038  
(646) 343-6722  
[DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.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, NY State Human Rights Law, or NYC Human Rights Law. A request for an alternative means of filing may be granted as 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. Grievant 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 DYCD's position, and offer options for substantive resolution of the grievance, where applicable.

## When and How to File an Appeal

The grievant may appeal DYCD's decision within thirty (30) calendar days of receipt of DYCD's response. The appeal should be mailed to:

Keith Howard, Commissioner  
New York City Department of Youth and Community Development  
123 William Street, 17th 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, NY State Human Rights Law, or NYC Human Rights Law. A request for an alternative means of filing may be granted as accommodation for a grievant with a disability.

## Timeline Following Filing of Appeal

DYCD's response to the appeal will be provided to the grievant in writing within sixty (60) days following receipt of the appeal. Grievant 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 DYCD'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 DYCD 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.

## Appendix 3: Website Accessibility Statement

DYCD 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) define requirements for designers and developers to improve accessibility for people with disabilities. They define 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 DYCD's Disability Services Facilitator at 646-343-6722 or [DycdAccessibility@dycd.nyc.gov](mailto:DycdAccessibility@dycd.nyc.gov).

### Assessment Approach

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