

## **Office of Labor Relations**

# Local Law 12 Five-Year Accessibility Plan 2025 – 2029

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### Background

Local Law 12 of 2023 ("Local Law 12"), codified as section 23-1004 of the NYC Administrative Code, requires agencies to prepare and publish 5-year accessibility plans outlining steps they plan to take to ensure that its workplace, programs, and activities are accessible to and inclusive of persons with disabilities.

### General

#### **Mission and Background of Agency**

Authorized by Executive Order 38 (February 7, 1967) amended by Executive Order 13 (July 24, 1990), the Office of Labor Relations (OLR) represents the Mayor in the conduct of all labor relations between the City of New York and labor unions representing employees of the City. The Commissioner serves on behalf of the Mayor as the City's liaison with both labor and management in the private sector.

The Commissioner represents the Mayor before the Office of Collective Bargaining in representations and all other matters over which the Office of Collective Bargaining possesses jurisdiction. Additionally, the Commissioner administers the Health Benefits Program, Management Benefits Fund, Employee Assistance Program, Medicare Part B Reimbursement and Pre-Tax Benefits & Citywide Programs including the Deferred Compensation Plan and NYCE IRA.

#### **Executive Summary**

OLR has completed its evaluation of its accessibility to individuals with disabilities, as required by Local Law 12 of 2023, in order to develop this Proposed Five-Year Plan. This Proposed Plan outlines the results of this assessment and includes measures that have been implemented or will be implemented to address barriers to accessibility for individuals with disabilities. The Proposed Plan addresses the five areas identified in section (b)(2) of Local Law 12 of 2023 (NYC Admin Code § 1004(b)(2)): Physical Access, Digital Access, Programmatic Access, Effective Communication, and Workplace Inclusion.

OLR will continue to regularly review the Agency's Physical, Digital and Programmatic Access, as well as strive to always improve Effective Communications and Workplace Inclusion.

OLR will continue to provide reasonable accommodations to enable individuals under certain qualifying bases to perform the essential functions of the job and enjoy equal employment opportunities. All city agencies are required to provide reasonable accommodations to all program applicants and participants, employees, interns (paid or unpaid), and consultants that permit them to perform the essential functions of their job in connection with disability; religion; status as a victim of domestic violence, sex offenses, or stalking; pregnancy, childbirth, or related medical conditions, including lactation needs (collectively, protected classes). Reasonable accommodations are for the requestor's condition only.

OLR will conduct further assessment, as needed, and implement solutions where practicable, to create an even more accessible environment. The implementation timeframe for all issues identified in the Proposed Plan is 2025- 2029.

#### **Accessibility Statement**

OLR is committed to ensuring that our digital and physical properties are accessible, welcoming, and inclusive to all, including persons with disabilities. OLR has and will continue to strive to improve user experience to provide full accessibility to everyone, including but not limited to persons with disabilities. OLR's 5-year plan was created in consultation with Administration, Legal and Executive Divisions of the Agency.

If you need assistance accessing a particular program or service, please reach out to the Office of Labor Relation's Disability Services Facilitator at **ContactAccessibility@olr.nyc.gov**.

Agency Links

Website Accessibility Statement

### Agency Plan – Implementation Period 2025 - 2029

Local Law 12 requires each agency to publish a plan describing the steps it is currently taking and will take over the next 5 years to ensure that your agency's workplace, services, programs, and activities are accessible to and accommodating and inclusive of persons with disabilities.

#### **Physical Access**

OLR is located in a non-City owned building at 22 Cortlandt Street where it occupies 11, 12, 14, 15 and 28 floors in the building.

Beginning in 2019, OLR began conducting accessibility assessments within the building to ensure that appropriate signage, building and restroom accessibility, customer service, and overall, ADA compliance concerns were assessed. OLR Administration will be conducting a walk through once a month to evaluate various areas of the offices such as:

- Surfaces should be smooth, slip resistant and free of obstacles.
- Provide sufficient lighting for individuals with low vision.
- Hallways/pathways should be wide enough to accommodate wheelchairs.
- Ensure sinks are wheelchair accessible heights and are sensor Operated.
- Use braille and tactile signs to identify facilities (e.g., elevators and Restrooms and exits).
- Ensure seating areas include wheelchair spaces, and furniture can be adjusted.

#### **Digital Access**

OLR assesses the accessibility of its digital content through self-evaluation and feedback from visitors to our website.

The Mayor's Office of People with Disabilities has assisted with training in the past and we will continue to use this vital resource for OLR staff development. Within the next year, we will identify and prioritize a list of digital assets from

our websites and social media that require accessibility enhancements, including hyperlink updates, alt text, close captioned videos and transcripts with audio descriptions. We require new pdfs and reports to be accessible prior to posting on the web and will develop a course of action for the conversion of older pdfs to an acceptable accessible format.

The Agency's website will be continually monitored and reviewed by the Web Productions teams to ensure compliance and to implement any changes necessary to improve our website's digital accessibility.

In addition, OLR will be exploring the following measures to increase accessibility of its digital content to people with disabilities:

- By the end of 2025, provide official accessibility training for staff who create digital content.
- Conduct user testing for new applications and tools, using applications such as screen readers to test content for accessibility issues.
- In 2025, develop a formal review process to ensure electronic documents are accessible prior to public distribution.

#### **Programmatic Access**

OLR has and will continue to provide the highest level of accessibility for persons with disabilities and all program applicants and participants. Those programs include the: Employee Assistance Program, Retiree Health Benefits Program, Deferred Compensation Plan, Management Benefits Fund, Flexible Spending Accounts Program and WorkWell.

The agency will make all necessary ADA and/or accessibility upgrades and adjustments to remain in compliance with the policies of the Mayor's Office for People with Disabilities (MOPD) and the City of New York. The Administration Division works closely with DCAS.

Some key considerations we will focus on when working with DCAS are:

- Ensuring OLR's building, restrooms, and entrances are wheelchair accessible and provide all needed accommodation for people with

disabilities. Check in with building engineers to ensure building is meeting necessary standards to accommodate people with disabilities.

- Work with the Division of IT to implement digital tools, forms websites that are accessible to users with disabilities, (e.g., screen reader compatibility and keyboard navigation). Check in with IT to ensure equipment has capabilities mentioned.
- Provide materials in alternative formats such as large print, audio, and braille. Contact DCAS for further information on how to obtain materials.
- Modify policies, practices, and procedures to accommodate individuals with disabilities.
- Educate staff to understand and address the needs of people with Disabilities by posting information throughout the office space and also disseminate via emails to all staff.

#### **Effective Communication**

It is OLR's policy to ensure that communication with individuals with disabilities is appropriate to their needs and preferences. OLR's EEO Officer is responsible for coordinating the Agency's efforts to comply with and carry out its responsibilities under federal, state, and local laws concerning effective communications for persons with disabilities.

The EEO Office's reasonable accommodation policy includes using the cooperative dialogue for auxiliary aids and services requests, with primary consideration given to the choice of aid or service requested. If meeting an employee's request poses an undue hardship, other accommodations will be considered to meet the requestor's needs.

In accordance with Local Law 51 of 2017, OLR is equipped with an Induction Loop to provide access to facilities for people who have difficulty hearing. The T-loop is capable of broadcasting a sound source directly to a compatible hearing aid or cochlear implant without background noise or interference. OLR maintains a list of spaces equipped with hearing loops and other assistive listening systems. There is proper signage at each location with an assistive listening system.

Starting in 2025, OLR will partner with MOPD to discuss providing the following aids and services:

- Sign Language Interpretation
- Video Remote Interpretation
- Communication Access Realtime Transcription (CART)
- Communication Cards
- Mechanism for providing documents in braille or audio recordings

#### **Workplace Inclusion**

OLR is committed to preventing discrimination and ensuring that all employees are aware of their rights and obligations under EEO. OLR will require all agency employees to complete disability etiquette and awareness eLearning training, offered by DCAS, every two years. OLR will encourage all agency employees to continue to work together to foster and maintain an atmosphere of diversity and workplace inclusion.

OLR will expand and improve upon its recruitment, hiring, promotion and retention efforts to ensure more visibility for individuals with disabilities. This will include participating in disability inclusive recruitment events, reviewing all job descriptions to ensure that they are disability-inclusive, and that the employment application process is useable by those using access technology.

The agency will accomplish these goals by continuing its use of programs like 55-a and posting jobs on platforms that use access technologies. Further, OLR will:

- Utilize its EEO Office and Administration to engage and educate hiring managers and supervisors on additional job platforms that can reach a more diverse hiring pool.
- Use Career Counselors to discuss promotional opportunities with staff.

- Include information for requesting accommodation in all interview confirmation letters/emails sent to candidates and offer different options for interviews.
- Require structured interview training for hiring managers by 2026.
- Train staff on how to arrange accommodations for internal and external candidates.
- Starting in 2025, all documents and forms provided to applicants as part of the pre-employment process will be offered in alternate formats.
- Continue annual meetings with building management to account for employees and visitors with disabilities, in the event of a fire or emergency.
- Continue to provide employees with the option of meeting in person or virtually for reasonable accommodations.

### Methodology

To assess whether OLR is effectively meeting the needs of clients and staff with various disabilities, a physical survey was conducted throughout the floors that the agency occupies at 22 Cortlandt Street. The plan focuses on critical areas of physical accessibility, such as workstations, private offices, conference rooms, service counters, pantries, restrooms, staircases, signage, elevators, entrances, lobbies, as well as programmatic access. The study's methodology also involved interviews with Human Resources (HR) professionals, OLR's Information Technology (IT) team, and the use of the MOPD self-evaluation questionnaire.

### **Additional Headings**

#### **Budget and Resource Allocation**

OLR will continue to evaluate ways to improve accessibility and allocate resources and budget as deemed necessary.

#### Training

OLR will continue to offer educational opportunities and training to our employees, some of which will be mandatory, to ensure that they are performing their duties and interacting with our customers in a manner that is respectful, inclusive, and free from discrimination. This will include training offered by the City, such as Everybody Matters, Disability Etiquette and Awareness, Structured Interviewing, How to Create Accessible Documents, and any other accessibilityrelated training needed to maintain relevant knowledge. These trainings will be provided to our employees on either an annual or bi-annual basis.