

New York City Department of Records & Information Services

PROPOSED 5 YEAR ACCESIBILTY PLAN 2024-2028

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Background

[Local Law 12 of 2023](#) mandates that each New York City agency, in collaboration with the Mayor's Office for People with Disabilities (MOPD), must develop and implement a comprehensive five-year accessibility plan. This legislation requires these plans to articulate the measures agencies are adopting to ensure the accessibility, accommodation, and inclusivity of their workplaces, services, programs, and activities for individuals with disabilities. This encompasses enhancements in physical, digital, and programmatic access, along with the provision of effective communications tailored for persons with disabilities. The initiatives include various aspects, such as structural modifications to leased, owned, or operated facilities, planned technological upgrades, and investments to enhance accessibility within the agency, its services and programs. Additional steps will be taken to enhance the overall accessibility and inclusivity of the agency's programs and services for individuals with disabilities.

Statement of Commitment

The New York City Department of Records & Information Services (DORIS) is dedicated to fostering an environment that is equitable, diverse, and inclusive. DORIS is committed to ensuring access to its services for individuals with disabilities, actively identifying, preventing, and eliminating barriers to accessibility, and meeting accessibility standards while preserving the dignity and independence of persons with disabilities.

Aligned with the intent of the legislation, the New York City Department of Records & Information Services is committed to making reasonable efforts to uphold the following principles in its policies, practices, and procedures:

- Providing Department services in a manner that upholds the dignity and independence of individuals with disabilities, enabling them to access, use, or benefit from Department resources and services.
- Offering persons with disabilities an equal opportunity to access, use, and benefit from Department resources and services.
- Communicating with individuals with disabilities in a manner that considers their disability and preferred method of communication.
- Planning the installation of assistive listening devices to facilitate the use of assistive devices for individuals with disabilities, supporting their access to Department resources and services.

Agency's Mission

The New York City Department of Records and Information Services (DORIS) operates the Municipal Archives, the Municipal Library, and the Municipal Record Center. The agency fosters civic life by preserving and providing access to 185,000 cubic feet of historical City government records, more than 400,000 publications and reports, and more than 42,000 reports online in the Government Publication portal. DORIS ensures that City records are properly maintained following professional archival and record management practices, develops, and enforces record management policies and makes materials available to diverse communities both online and in person.

Agency's Direct Public Service Divisions: There are three divisions that interact with the public, they are: the Municipal Library, Municipal Archives and Outreach/External Affairs. This accessibility plan is designed to provide accessibility to these divisions as well as to the agency's websites and Social Media Platforms. By providing and improving accessibility to all patrons, both physically and digitally, DORIS hopes to increase the utilization of the agency's vast collections and programs.

The Municipal Library provides reference services, oversees an online repository of reports from City agencies and jointly operates a research center with the Municipal Archives that is open to the public. The holdings are published documents that show the evolution of New York City government from the 19th Century to the present. The collection is comprised of books, reports, press releases, maps, meeting minutes and agendas, indices, and clippings. The Municipal Archives preserves and makes available New York City government's unpublished historical records dating from 1645 to the present. The collections include office records, manuscript material, still and moving images, ledgers, birth death and marriage records, maps, blueprints, and sound recordings. The Outreach/External Affairs division interfaces with the public via social media platforms, the agency website, lectures, exhibits and public program activities.

Contact Information

DORIS's Executive Division along with its Accessibility Committee is responsible for developing and updating the Department's Five Year Accessibility Plan.

- Online Resources – The DORIS website contain useful information for individuals with disabilities, including:
 - a) Non-Discrimination Policy and Notice of Rights
 - b) Grievance Procedures
 - c) Website Accessibility Statement
 - d) Five-Year Accessibility Plan

To access DORIS's online accessibility resource page, please visit <https://www.nyc.gov/site/records/about/accessibility.page>.

- Accommodation Requests

In accordance with Local Law 27 of 2016, each City agency is mandated to designate a Disability Service Facilitator ("DSF"). The DSF plays a crucial role in coordinating the agency's initiatives to fulfill its obligations under the Americans with Disabilities Act ("ADA") and other pertinent federal, state, and local laws and regulations related to access for individuals with disabilities to agency programs and services. Serving as liaisons to people with disabilities, these individuals establish connections between people with disabilities and the City government. Anyone, be it employees or members of the public, requiring assistance to access a specific program or service is encouraged to reach out to DORIS's DSF, at (212) 788-8610 or by email at: disabilityservicesfacilitator@records.nyc.gov
- Availability

DORIS's accessibility plan is publicly posted at <https://www.nyc.gov/site/records/about/accessibility.page> . Individuals may request a copy of this document in an alternative format that is accessible to them by contacting the DSF at (212) 788-8610 or by email at: disabilityservicesfacilitator@records.nyc.gov

Executive Summary

DORIS is dedicated to promoting equity within its workforce and in its public service. In alignment with the ADA and Local Law 12 of 2023, DORIS has developed this prospective accessibility plan to pinpoint priority areas for eliminating obstacles to accessing its services. The aim is to empower its workforce for enhanced service delivery to the people of New York City and the world. The plan focuses on improving access in the following areas: (1) Physical Access; (2) Digital Access; (3) Programmatic Access; (4) Communications; and (5) Workplace Inclusion.

The primary objective of this proposed plan is to outline how DORIS will identify, eliminate, and prevent barriers for individuals with disabilities, ensuring compliance with the ADA and other legal mandates. The projected timeframe for this plan is between 2024-2028. The plan draws insights from consultations with DORIS's management, DORIS's Disability Service facilitator (DSF), DORIS's Accessibility Committee, and the Mayor's Office for People with Disabilities. In response to past, present, and future accessibility challenges, DORIS has crafted this proposed plan to rectify existing issues, remove barriers, and preempt the emergence of new challenges in the specified areas. DORIS welcomes public feedback on this proposed plan and commits to achieving its goals by attentively considering and addressing concerns from the public. While the plan is designed to be comprehensive, a more detailed assessment may be necessary in some cases to identify effective long-term solutions and implementation strategies. Consequently, the proposed plan will continually evolve, aiming to fulfill accessibility objectives and adapt to evolving standards and requirements.

DEPARTMENT OF RECORDS & INFORMATION SERVICES PROPOSED 5 YEAR ACCESSIBILITY PLAN 2024-2028

PHYSICAL ACCESS

DORIS operates three (3) locations, two of the three locations are open to the public. DORIS's space located at 31 Chambers Street, New York, NY 10007 is home to the Municipal Library and Municipal Archives. DORIS's Industry City space located at 147 41st Street, Suite 7A Brooklyn New York 11232, is home to its vast Municipal Archives Collections, both locations are open to the public. DORIS's Queens warehouse location holds records from various city agencies, this location is not open to the public. DORIS has conducted a physical access self-assessment within its spaces, with the goal of identifying physical barriers in public access areas as well as in staff offices. DORIS will continue to formulate strategies to enhance the accessibility of its facilities.

DORIS will look to implement several physical access improvements within its spaces, to include the following:

31 Chambers Street New York, N.Y. 10007

DORIS's Municipal Library, Municipal Archives, and staff workspaces are located inside this historic and landmarked building. The building also known as the Hall of Records or Surrogate's Court was completed in 1907. The building is operated by the Department of Citywide Administrative Services (DCAS) which will be tasked with conducting a comprehensive building assessment of all public spaces, to identify accessibility issues. The assessment should include building entrances, bathrooms, lighting, elevators, stairs, fire alarms, and emergency plans.

The building lends itself to an environment that allows access to persons with disabilities. There is an entry way equipped with a lift into the interior of the building allowing access if the person served, personnel or other stakeholder is in a wheelchair/mobility aid. The route of travel from this entrance to DORIS's public spaces requires the use of one of the building's four elevators. The route of travel from the entrance to the DORIS public spaces, is stable, well-lit, and firm. The interior of the building is free from clutter that would prohibit the passage of an individual using a mobility aid. The Research Rooms, in room 111 and room 103, are large, and entrances are wide enough to accommodate people who use a wheelchair/mobility aid. Movement within the space is comfortable without restriction. The restrooms located on various floors of the building are handicap accessible and are reachable using one of the four elevators.

31 Chambers Street Physical Access Issues and Potential Solutions

- Entering rooms 111 and 103 - Patrons with mobility issues may have trouble entering, due to the doors not having an automatic button. Both room 111 and 103 are currently in need of either automatic or push button door openers or retrofitting current door handles and replacing them with accessible door handles. A simple and quick solution may be to keep the doors open during the times they are open to the public. The slightly raised marble threshold is under ½ inch which complies with ADA regulations. The doors will need additional consultation with DCAS to develop a solution, since they are part of a landmark building.
- Accessible workstations in room 111 and room 103 - DORIS will equip at least one accessible workstation in each room to accommodate a wheelchair-bound patron. The workstation will be equipped with a computer screen at least 19 inches, with a specialized keyboard and mouse designed for people with manual dexterity issues.
- Lack of Assisted Listening Devices (ALD's) in room 111 and 103 - There are no available ALD's in either room. ALD's should be installed to assist hearing impaired patrons.
- Replace signage inside room 111 and 103 - Signage will need to be resized using larger font size with appropriate contrasts.

Industry City

The building at Industry City lends itself to an environment that allows easy access to persons with disabilities. Disabled parking spaces are located near the doorway and the entry ways are equipped with required ramps into the interior of the facility allowing easy access if the patron/staff member uses a wheelchair/mobility aid. The route of travel to DORIS's location on the 7th floor, requires the use of elevators, which are accessible. DORIS's 7th floor public space facility as well as its Archives storage areas on other floors are newly constructed, completed in 2021. The interior of the facility is free from clutter that would prohibit the passage of a patron/staff member using a mobility aid. The reception area is large, and hallways and public rooms are wide enough to accommodate the person served or staff member to move about comfortably without restriction. The restrooms located on the floor are primarily used by patrons and staff. They are newly designed and built complying with current ADA guidelines. They are equipped with the appropriate grab bars for transfer from a mobility aid, if necessary. Sinks and soap dispensers are at appropriate heights to accommodate persons with disabilities. An audio induction loop is installed in the areas open to the public to assist hearing impaired patrons.

Industry City Physical Access Issues and Potential Solutions

- Accessible workstations on the 7th floor public service room - DORIS will look to provide at least one accessible workstation to accommodate a wheelchair bound patron. The workstation should be equipped with a large computer screen at least 19 inches, with a specialized keyboard and mouse designed for people with manual dexterity issues.
- Replace signage on the 7th floor - Signage will need to be resized using a larger font size with appropriate contrasts.

Queens Warehouse

The Queens Record center is a warehouse which is not open to the public. Staff Office space within the warehouse was recently renovated in 2021. The staff area is large, and aisles are wide enough to accommodate staff moving about comfortably without restriction. The restrooms located on the floor are newly designed and built complying with current ADA guidelines. They are equipped with the appropriate grab bars for transfer from mobility aid, if necessary. Sinks and soap dispensers are at appropriate heights to accommodate persons with disabilities.

Queens Warehouse Physical Access Issues and Potential Solutions

- Replace signage on the floor - Signage will need to be resized using a larger font size with appropriate contrasts.

Time frame to make recommended changes will be between 2024-2025.

DIGITAL ACCESS

DORIS remains dedicated to achieving conformance with Web Content Accessibility Guidelines 2.1 Level AA for both our internal intranet and public-facing websites. The Department has published its Web Accessibility Statement on the Accessibility webpage, accessible through the following link: <https://www.nyc.gov/site/records/about/accessibility.page>, aligning with the requirements of Local Law 12. DORIS has conducted a digital access self-assessment, with the goal of identifying digital accessibility barriers in the agency's digital platforms and digital communications. This section outlines the current state of digital access for websites, applications, social media, and electronic documents.

Websites and Applications

DORIS manages various websites and applications used by both employees and members of the public. DORIS websites and applications are developed with an accessibility-first approach. This allows for potential web accessibility issues to be considered at the planning stage of the development cycle and evaluated throughout the process. Websites and applications managed by DORIS strive to achieve conformance with Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. In collaboration with the Mayor's Office for People with Disabilities (MOPD), public facing websites are evaluated for web accessibility prior to release. Accessibility issues found during the evaluation process are addressed by the DORIS Application Development Team.

Websites and applications that are developed going forward utilize the NYC Core Framework (<https://www.nyc.gov/assets/oti/html/nyc-core-framework/index.html>), an open-source web framework with added design patterns and other components optimized for accessibility, translatability, usability, and clarity of presentation.

Social Media

DORIS manages several social media platforms such as Facebook, Instagram, X (Twitter), Tumblr, and YouTube to interact with the community and our patrons. Social media is used to inform the public of our services and collections. The DORIS Social Media team has taken accessibility training in order to apply industry best practices when creating content. These best practices include:

- Avoiding the use of ASCII text.
- Avoiding the use of decorative text in post captions.
- Avoiding the use of text in graphics.
- Use of alternative-text on image posts.
- Use of CamelCase text.
- Limited use of emojis.

Electronic Documents

DORIS creates and disseminates information through electronic documents. These documents are created by various agency sub-units and are shared with the public to provide access and insight into our collections and workflows. The predominant formats are PDF and Word documents, but the agency also creates PowerPoint presentations and Excel databases. DORIS follows guidelines when creating these documents such as using specific color schemes, fonts, and file naming conventions to make documents more accessible.

Digital Access Issues

DORIS has identified the following digital access issues that may affect employees and patrons who use the agency's services. Each Access Issue is accompanied by a proposed solution and a proposed timeline.

Policy and Procedure Access Issues

1) DORIS lacks a centralized location where employees who create content can reference materials regarding best practices and guidelines for making content digitally accessible. This results in varying standards and levels of conformity across divisions within the agency. The agency should establish a uniform set of standards to ensure consistent and expected results when a user with disabilities interacts with the digital content.

Solution: To resolve this issue, the DORIS Application Development Team will create a page on the DORIS Intranet that is a dedicated repository of resources for accessible digital content. This page will contain guidelines for creating digital content across various platforms. The resources provided on this page will facilitate access throughout all stages, including planning, creation, and remediation of existing content. The information found on this page will combine resources both created by DORIS employees as well as gathered from other city

agencies and external organizations such as Mayor's Office for People with Disabilities (MOPD), OTI (Office of Technology and Innovation), and the National Archives and Records Administration (NARA).

Timeline: By the end of March 2024, the agency aims to identify the materials to be posted on the DORIS accessibility page with respect to the various platforms (websites, applications, social media, electronic documents, emails).

By the end of June 2024 the agency aims to develop a preliminary version of the DORIS accessibility page that will focus on providing resources on best practices for the most common types of digital content created.

By the end of 2024 the agency aims to have a fully functioning digital accessibility page on the DORIS Intranet which will contain resources that employees can use throughout the entire process of digital content creation.

Website and Application Access Issues

1) Not all public facing websites and applications conform to the Web Content Accessibility Guidelines (WCAG)

2.1 Level AA standard. High impact accessibility issues were resolved prior to release, however there are outstanding and new issues that are discovered as the websites and applications continue to grow. This causes difficulties for users who rely on assistive technologies such as screen readers to access the website content.

Solution: To resolve this issue, The DORIS Application Development Team will analyze all remaining accessibility issues across all public facing websites. This process consists of ensuring that each matter has an explanation of the issue in the form of a User Story, a list of Acceptance Criteria that the solution will be evaluated against, and an estimate for development time. After this review process is completed, the issues will be prioritized and scheduled into regularly occurring development cycles.

Timeline: By the end of 2024, the agency aims to perform a full backlog grooming of previously recorded accessibility issues across all 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.

By the 3d year (2026) the agency aims to resolve all remaining accessibility issues and fully conform to the WCAG 2.1 Level AA standard across all public facing websites and applications.

2) Not all internal websites and applications have been evaluated for accessibility. While the Application Development Team works with accessibility in mind, a formal evaluation has not been performed on websites and applications that have been created by employees in other divisions. Without an evaluation, there may be lingering web accessibility issues that hinder the day-to-day work of employees who navigate using assistive technologies.

Solution: To resolve this issue, the DORIS Application Development Team will perform a digital accessibility evaluation on all websites and application used internally by DORIS employees. After the evaluation a planning and requirements session will be scheduled to record issues that are found during the evaluation. With a goal of resolving all issues to reach a WCAG 2.1 Level AA standard across all internal websites and applications.

Timeline: In the next two years (2024-2025) the agency aims to perform a digital accessibility evaluation on all internal DORIS websites and application.

By 2026, the agency aims to gather all requirements (User Story, Acceptance Criteria, Estimates) from the outcomes of the evaluation and created a prioritized feature backlog.

By the end of 2026, the agency aims to schedule high priority digital accessibility issues into regularly occurring development cycles with the goal of completing the backlog to conform with the WCAG 2.1 Level AA standard.

Social Media Access Issues

1) **Not all image posts have alternative-text.** Alternative-text or alt-text is necessary for visually impaired users to understand the function and appearance of an image through the assistance of a screen reader. Without alt-text these users may miss out on information that our social media posts are conveying. It is important to use alt-text and to make it as accurate and specific as possible to effectively represent the images posted by the agency.

Solution: To resolve this issue, the DORIS social media team will update their posting workflow to ensure alt-text is added to all images going forward.

Timeline: In the next six months the agency aims to identify the steps needed to add alt-text to images across all managed social media platforms. Once identified, a review process will be created to ensure that all posts with images are prepared with alt-text prior to posting.

From 2025 -2028, the agency aims to develop a remediation process to correct older image posts.

Electronic Documents Access Issues

1) **DORIS plans to improve awareness of existing agency standards for electronic document creation and will develop best practices when creating accessible documents for internal and external distribution.** Generally, the implementation of accessibility guidelines has been limited to documents that are public facing, such as those found on our main website and posted online. Accessibility checks have not been performed for all document types or on all public-facing platforms. Internally, manuals, forms, and other types of documents are created by each sub-unit and have no consistent style guide or workflow for their creation.

Solution: To resolve this, DORIS will standardize the process of electronic document creation that follow accessibility guidelines. Templates for document types will be created or revised based on the guidelines and distributed on the agency's Intranet. Documents meant for both internal and external use will adhere to the same set of guidelines.

Timeline: In 2024 the agency will start gathering existing electronic document templates. Research will be done on what guidelines should be used when creating accessible templates.

From 2025-2026, the agency will draft best practices for creating different types of documents using these guidelines.

In the next five years the agency aims to establish accessibility guidelines for all electronic document formats used and revise existing templates as necessary. Updated guidelines and templates will be posted on the DORIS Intranet and distributed to ensure consistency across the agency. Training will be conducted for supervising staff that oversee document creation and for all staff responsible for creating or disseminating electronic documents.

2) Electronic documents shared with the public are inconsistent in their compliance with accessibility guidelines and recommendations. The agency uses Optical Character Recognition (OCR) to convert electronic documents into text that can be easily searched and analyzed. However, not all content has been processed through OCR or checked for accessibility. Furthermore, there is a need for a consistent review process across all units to ensure clarity in electronic documents.

Solution: To resolve this issue, DORIS will update workflows to incorporate OCR to all applicable electronic format documents which will increase the readability for people who use screen readers.

Timeline: From 2024-2025 the agency aims to revise existing workflows to include the application of OCR and accessibility checkers. Workflows and a review process will be created for electronic documents that are intended to be shared with the public.

In the next five years the agency aims to review and remediate any legacy files that have been shared on public platforms.

3) Forms and invoices will be reviewed for plain language. DORIS uses various forms, both internally and externally. Some of these forms are physical, completed by users and then scanned and stored in multiple locations. These forms, such as permissions forms for use of collections, require precise language that must be approved. Additionally, their hard-copy design and format makes them difficult to use with screen readers or other accessibility software. Other forms used by the agency are created digitally and are designed to be responsive. They include elements produced by the reference and programming teams to track visitors. These forms often contain mandated fields, making the form-filling process tedious and overwhelming.

Solution: To resolve this issue, DORIS will revise the agency's forms to improve accessibility and usability. Language will be revised to be clear and concise while following principles for creating accessible text. Forms that were originally scanned from paper formats will be converted to born-digital formats so that they work well with assistive technologies.

Timeline: In 2024 the agency aims to identify all forms in use, in all formats, along with their purpose and employees who use them. The principles of accessible digital forms will be researched.

In 2025 the agency aims to prioritize revising forms used by the public to improve digital accessibility.

In the next five years the agency aims to have all forms, internal and external, in an accessible format that allows for ease of use and gathering of information.

4) Inconsistent or missing alternate description for digital audiovisual content. DORIS is responsible for creating and sharing digital content including archival images and audiovisual material created by Municipal Agencies. This content is shared with virtual and in-person audiences on various digital platforms, websites, applications, and exhibits.

Although some hosting platforms auto-generate descriptions, there is no consistent creation of accessible descriptions for audiovisual content. DORIS also creates unique digital content, such as recording live events and overseeing audiovisual projects, including stories gathered from City residents. There is no consistent standard for capturing footage or creating audio descriptions or closed captioning for these types of files.

Solution: To resolve this issue, DORIS will research and procure software that can generate closed-captioning and audio descriptions. This software will be incorporated into the workflow used when creating audiovisual content.

Timeline: In 2024 the agency aims to identify the locations and channels for audiovisual content. DORIS will determine who the current creators of audiovisual are and their current workflows when creating content.

In 2025 the agency aims to request procuring software that can be used to generate closed-captioning and audio descriptions. Workflows will be updated to incorporate the software. Training will be provided to staff who create audiovisual content.

From 2024-2028 the agency aims to develop a remediation process to revise legacy audiovisual materials to include alternate descriptions and finalize policies to ensure continued use.

Email Access Issues

1) Need to develop consistent procedures to create accessible emails. Email is the most used form of digital communication at DORIS. Email is used daily internally and to answer inquiries from the public about our services. Having emails that are not digitally accessible may hinder the agency's communications with people who use assistive technologies to read emails. Overall, employees require guidance on what concepts make email accessible. Concepts such as ensuring the subject line is meaningful to the email, using proper heading structure, and using accessible fonts/colors should be all be incorporated into agency guidance. Modern email clients come with accessibility checkers built-in which assist with the process of writing accessible emails. First, users must be informed on what to check.

Solution: DORIS will create guidelines on how to write accessible emails. An accompanying training will be developed and presented to employees so that techniques are followed consistently across the agency.

Timeline: In 2024 the agency will identify the issues a person using assistive technologies may encounter when reading emails. Based on the findings and research on best practices, guidelines on writing accessible emails will be created and distributed to employees.

In 2024 the agency will develop a training based on the guidelines created and present it to employees.

Glossary of Terms used in Digital Accessibility Section

Acceptance Criteria: a set of conditions that must be satisfied for a software feature to be considered completed.

ASCII: American Standard Code for Information Interchange. An encoding standard for electronic communication. Screen readers can have difficulty interpreting some ASCII characters.

Backlog Grooming: a process in the software development life cycle where backlog items are discussed, reviewed, and prioritized. The goal of backlog grooming is to keep the backlog up-to-date and ensure that items are prepared for development.

Born-digital: materials that are created in a digital format. This includes websites, email, digital photographs, electronic documents, and more. Born-digital items are distinct from analog items that are subsequently digitized, such as paper manuscripts.

CamelCase: a way of writing phrases without spaces, where the first letter of each word is capitalized.

Collection Guides: An online catalog of the Municipal Archives' archival holdings. (<https://a860-collectionguides.nyc.gov>)

Optical Character Recognition (OCR): a technology that converts an image of text into a machine-readable text format.

User Story: A user story is an informal, general explanation of a software feature written from the perspective of the end user. Its purpose is to articulate how a software feature will provide value to the customer.

PROGRAMMATIC ACCESS

Ensuring accessibility and inclusion for people with disabilities is a principal concern for DORIS. Identifying barriers to accessibility in the agency's public areas and programs has been a key component in the development of this plan. Access issues identified by the Accessibility Committee are categorized in two areas. 1. Accessibility awareness by patrons and staff, 2. Signage and Handouts.

Accessibility Awareness for Patrons and staff.

To increase awareness to the public and staff on the identity of the DORIS Disability Service Facilitator (DSF), the role of a DSF, how to contact the DSF, and what resources are currently available.

Proposed Solution:

On DORIS Website's: Include contact information for the DSF in an easy-to-find location.

Create an "Accessibility" page on the "About" section of the main DORIS website with all relevant information in one central, easy-to-find location.

On the FAQ page link to "DSF Information"

List the DSF information in the DORIS Language Access Plan.

31 Chambers Street and Industry City:

The contact information for the DSF will be displayed in public serving rooms at 31 Chambers Street and Industry City, similar to the manner that information about the Language Interpretation Services is displayed. Currently, the description of language access services is displayed in Lucite frames in various locations throughout the rooms. The same display method can be used with the DSF contact information.

Public Exhibitions and Public Programs:

Include the DSF contact information in all newsletters and events advertisements/literature/announcements. Request funding to produce Braille version, audio files, etc. of materials used for upcoming public exhibits or public programs. Provide contact information for the DSF in all materials used to promote upcoming events.

Signage and Printed Documents:

To improve current signage and handouts to accommodate individuals with visual or hearing difficulties.

Proposed Solutions:

Public Exhibitions and Public Programs:

Inform people about the availability of any Braille version or audio file for upcoming public exhibits or public program events through newsletters/advertisements/announcements.

Develop large-print and Braille versions of signage used for individual exhibit cases in the public exhibits.

Create a Braille version and large print of the exhibit list.

Request funding to create an audio “tour” of the exhibit—this could be posted to YouTube, queued up and ready to play at a nearby computer station.

Timeline

The solutions for the above-mentioned issues can be implemented by the end of 2025 if funding is available.

Effective Communications

Evaluating the effectiveness of DORIS’s communications with people with disabilities has been a key component in the development of this plan. The DORIS accessibility committee completed an Effective Communication self-evaluation survey resulting in identifying various access issues, proposing solutions and anticipated timelines.

Cooperative Dialogue

DORIS will develop a procedure for using cooperative dialogue to handle requests for auxiliary aids and services. DORIS will develop a training on accessibility aimed at public facing staff. One of the topics will be how to arrange for auxiliary aids and services requested. Timeline to develop, approve and implement by the end of 2024.

Assisted Listening Devices , ASL Interpretation Services, Communication Card

DORIS will request funding to purchase assistive listening devices (ALDs) for the public rooms at 31 Chambers. DORIS will also request funding to contract with an ASL provider to ensure sign language interpretation is available on demand, utilizing video remote interpretation (VRI). DORIS will assess its current internet services to ensure there is sufficient bandwidth to deliver high quality video images without any lags, choppy or graining images. Training on how to use VRI services, ALDs, screen readers, magnification software, and Telecommunications Relay Service phone calls will be incorporated in the training DORIS will develop for its public serving staff. Timeline for these actions should be by the end of 2025.

A communication card to aid in-person interactions with people who are deaf or hard of hearing will be developed. Timeline to develop and approve and produce cards will be by the end of 2024.

Braille, Plain Language and Large Print Documents

DORIS will seek funding to convert certain documents and exhibit signs to Braille. Existing documents will be formatted to make them available in large print. Timeline for these actions should be by the end of 2025.

DORIS follows the Plain Language methodology in reviewing all content, including forms. The agency will continue to make information more accessible for people with intellectual, developmental, and learning disabilities. Timeline is ongoing for continuous improvement.

Expressive and receptive communication with or without the use of auxiliary aids provides patrons and staff an equal opportunity to participate in or benefit from the agency's programs, services, and/or activities. DORIS will ensure that patrons and employees who are deaf, hard of hearing, and/or disabled are aware of how to submit a request for an accommodation for auxiliary aid(s) to ensure equal opportunity while seeking our services. In addition, DORIS will continue to hold all meetings, conferences, workshops, hearings, trainings, seminars, or other similar functions in an accessible space. Timeline is ongoing.

Workplace Inclusion

DORIS fosters an environment that is based on freedom from discrimination and absence of cultural barriers. DORIS provides its entire staff with opportunities to develop, participate, contribute and to exercise their full creativity and expertise directed toward its mission. DORIS's management and Executive Staff work together to cultivate an environment which values differences and individuality and encourages the full development of all professional potentials.

DORIS recognizes the importance of eliminating employment barriers by establishing a nondiscriminatory policy for its employees and applicants for employment. It has been, and will continue to be, the policy of DORIS to be an equal employment opportunity employer. In keeping with this policy, the agency will review, update and/or implement the following items.

Accessibility Policies

DORIS has developed a proposed five-year accessibility plan that outlines the strategies and actions to identify, prevent and remove barriers for people with disabilities. Specifically:

1. DORIS will incorporate the Citywide EEO Policy into DORIS's Code of Conduct and will update DORIS's Employee Handbook. DORIS's current policy requires all employees to read, review and sign the Code of Conduct, upon onboarding and requires managers, including executive staff to affirm their commitment to EEO policies and laws on an annual basis.
2. The Department will review, assess, and amend, where necessary, its internal policies and procedures to incorporate accessibility equity into DORIS's core operations with respect to employees and members of the public.
3. DORIS will review internal policies on a regular basis and add updates regarding accessibility based on relevant laws, rules and regulations to the Employee Code of Conduct and Employee Handbook.

Employment Standards and Reasonable Accommodations

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

DORIS will take 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 DORIS's EEO Office.
3. The EEO Officer 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. The EEO Officer informs employees of policies that support employees with disabilities and notifies employees when there is a change in policy, as soon as practicable.

Individual Accommodation Plans

Consistent with the Citywide EEO Policy and relevant laws and rules, DORIS's EEO Officer 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.
5. Reasons for denial.
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 Information & Emergency Response Plan

DORIS will review its current process for documenting employees' accessibility challenges and will update information about individual emergency response accommodations. DORIS has individual emergency response plans for employees with disabilities in order to ensure such employees can be safely evacuated from agency premises in the event of emergency. The workplace emergency response information is provided to the designated employee(s) responsible for coordinating emergency responses. An individual emergency response plan shall include the employee location, type of disability, and any special equipment required for safe transport and evacuation. DORIS will ensure this process has been extended to recently onboarded employees and will continue to review the plans to ensure they are updated and accurate.

Performance and Career Development

DORIS is committed to ensuring that the accessibility needs of employees with disabilities are taken into account with regard to performance management and career development.

Duties will be set within the established tasks and standards framework to accommodate an employee's disability as will the evaluation of employee performance.

1. Accessibility needs of employees with disabilities, as well as individual accommodation plans, shall be taken into account when using performance management processes.

Duties within established tasks and standards and evaluation of employee performance will take into account an employee's individual accommodations. Timeline to develop, review and implement the above listed practices will start in 2024 and should be completed and implemented by the end of 2024.

Methodology

DORIS is dedicated to identifying priorities that enhance accessibility and promote inclusion. The department has established the following objectives to proactively address and prevent accessibility barriers in the upcoming years:

Proposed Plan Objectives

- a) Review and update existing accessibility policies and procedures on an annual basis.
- b) Survey all employees for suggestions on improving accessibility at the agency.
- c) Collect demographic data on staff to assess the representation of individuals with disabilities and other diverse groups within DORIS.
- d) Enhance employment and other opportunities for under-represented populations.

Accessibility Committee

To develop this proposed plan, DORIS collaborated with its Disability Service Facilitator, DORIS's Accessibility Committee composed of members from each division, and the Mayor's Office of People with Disabilities. Information currently gleaned by the EEO Officer through the reasonable accommodations process provides the committee with nonidentifiable historical and current insights into disability-related inquiries and needs. This information plays a crucial role in identifying access issues outlined in the proposed plan. It also serves as a reference point for future updates to the plan. DORIS welcomes public input on this proposed plan and is committed to achieving its goals by attentively addressing concerns raised by members of the public as well as agency employees.

Self-Evaluations Tools

MOPD has 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. The DORIS accessibility committee used these tools to assess and identify accessibility issues in its physical locations, digital content, programs and services, communications, and workplace. Utilizing the results of the self-evaluation tools, the Accessibility Committee met and discussed the various findings to incorporate them into this proposed plan. Valuable input from each member of the committee resulted in this comprehensive plan. DORIS will maintain an active Accessibility Committee to continue updating the plan as well as assisting in reaching the various milestones and objectives, specified within.

Opportunity to Comment on the Proposed 5 year Accessibility Plan

[Local Law 12 of 2023](#), codified as NYC Administrative Code § 23-1004, requires every agency to develop and implement a plan that includes the steps it is currently taking and will be taking over the next 5 years to ensure that the agency's workplace, services, programs, and activities are accessible to and accommodating and inclusive of persons with disabilities. The accompanying plan is the Department of Records & Information Services proposed 5-year accessibility plan under Local Law 12. We encourage the public to provide feedback that we will consider as we work to finalize the plan over the next several months.

How to Comment on the Proposed Plan

Anyone can comment on the proposed plan by:

- **Email.** You can email comments to disabilityservicesfacilitator@records.nyc.gov. Please include "Accessibility Plan" in the subject line.
- **Website.** You can submit comments via the Agency Accessibility Plan website at nyc.gov/accessibilityplans.
- **Mail.** You can mail comments to:

Department of Records & Information Services
31 Chambers Street Room 305
New York, N.Y. 10007

Please make clear that you are commenting on the 5-year accessibility plan.

Deadline to Submit Comments

The deadline to submit comments is **February 16, 2024**. If sending your comments by mail, they must be postmarked no later than February 16, 2024.

What if I need a Copy of the Plan in an alternative format or I need an alternative way to comment on the plan as an accommodation for my disability

You may request a copy of the proposed plan in an alternative format, such as Braille or an audio recording, or an alternative means of commenting on the proposed plan, by contacting Department of Records & Information Service's disability service facilitator at disabilityservicesfacilitator@records.nyc.gov or by calling 212-788-8610.

Can I review comments made on the proposed plan?

You can review the comments made online on the proposed plan by going to nyc.gov/accessibilityplans. Following the close of the public comment period, copies of all comments submitted will be available to the public on DORIS's website.

Training

DORIS strongly believes that a well-trained staff is a productive staff, which will be able to deliver quality service to the public. The Accessibility Committee has suggested that DORIS staff complete the existing training module from DCAS E-Learning, and that the agency develop two additional training modules covering more specific areas. The suggested training modules are listed below.

1. DCAS E-Learning training course entitled Disability Awareness and Etiquette – All DORIS employees will undertake this training upon onboarding and on a 3- year cycle.
2. Starting in 2024, DORIS will also reach out to MOPD to assist in developing an internal training module for all DORIS employees. The training module should be complete and ready for rollout by the end of 2025. Training will cover the following topics:
 - Chapters 1, 3 and 4, Title II of the Americans with Disabilities Act of 1990
 - Section 504 of the Rehabilitation Act of 1973
 - Role of agency's Disability Service Facilitator (DSF) and DSF's Contact Information
 - Auxiliary Aids and Services for People Who are Deaf or Hard of Hearing
 - Developing Accessible Documents and Presentations
 - Requirements for making meetings, conferences, and services accessible.
 - Awareness of DORIS Accessibility Plan, including how to access the Plan.
 - Developing Email Standards to include plain language, reasonable sized and legible fonts, color contrast.
3. Starting in 2024, DORIS, in consultation with MOPD, will develop a more comprehensive training module for DORIS's public serving staff. Public serving staff will receive in-depth training on how to provide assistance to persons with disabilities. The training module should be complete and ready for rollout by the end of 2025. At a minimum, this training will consist of:
 - Procedures for serving patrons and companions who are deaf, hard of hearing, low vision, blind, or have mobility limitations.
 - Awareness of deaf or hard of hearing; speech limitations; low vision and blindness; reading limitations and dyslexia; and mobility limitations.
 - Available communication resources for patrons with disabilities, including screen readers, Assistive Listening Devices, Video Remote Interpretation, Telecommunication Relay Service (TRS).
 - Reporting patron disability access complaints.
 - How to provide reasonable accommodations for customers and potential customers, i.e., how to access auxiliary aids.

Documentation of all staff training activities and patron complaints will be maintained by DORIS's DSF along with its training liaison.