

5-Year Accessibility Plan

In accordance with NYC Local Law 12 of 2023

Published: January 13, 2025



Table of Contents

Introduction	3
Mission and Background	3
Accessibility Statement	4
Accessibility Plan	4
Physical Accessibility	4
Digital Access and Effective Communication	5
Programmatic Access	6
Workplace Inclusion	7
Training	9
Methodology and Assessment	10

Appendix A: Glossary	.11
Appendix B: CORE's website accessibility statement	. 12
Appendix C: Grievance Procedure	13



Introduction

The 5-Year Accessibility Plan describes the steps that the NYC Commission on Racial Equity (CORE) is currently taking and will take over the next 5 years to ensure that our workplace, services, programs, and activities are accessible to, accommodating and inclusive of persons with disabilities, in accordance with Local Law 12 of 2023.

The NYC Commission on Racial Equity 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. The Commission's ADA Coordinator/Disability Service Facilitator works to ensure that the Commission complies 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.

If you or someone you know needs a language related or disability-related accommodation in order to participate in a program or receive NYC CORE services (other than for employment), contact Lorenzo Van Ness, Director of Community Organizing and Engagement, Language Access Coordinator and ADA Coordinator/Disability Service Facilitator by:

Email: <u>AccessCORE@core.nyc.gov</u>

Phone: (212) 748 - 0313

Mail: NYC Commission on Racial Equity, Attn: Lorenzo Van Ness 233 Broadway, 5th Floor New York NY 10279

Link to CORE's website accessibility statement and grievance procedure: https://www.nyc.gov/content/core/pages/accessibility-statement-and-services

Mission and Background

In November 2022, New York City voted to establish the Commission on Racial Equity (CORE) to advance racial equity in government operations and to increase community voice in government decision making.

CORE is charter mandated to work with communities to do the following:

- Identify and propose community equity priorities. These community equity priorities will inform city government's newly required racial equity planning process and actions.
- Review and publicly comment on the new citywide Racial Equity Plans.
- Publicly track agency compliance with Racial Equity Plans and processes.
- Receive complaints about agency conduct that may have the effect of exacerbating racial equity disparities and make recommendations to agencies to address such complaints where appropriate.



• Respond to requests of the speaker of the council and its committees regarding racial equity concerns.

To carry out the agency's mandate, the Commission engages in various cycles of community engagement throughout the City's diverse communities in order to increase their voice in government decision making. CORE works to achieve its mission through community outreach, workshops, and training sessions among other initiatives. These efforts are done in collaboration with different advocacy organizations, city agencies, elected officials, and community stakeholders.

Accessibility Statement

The Commission on Racial Equity is committed to ensuring that people with disabilities have full access to our facilities, programs, and services. If you have questions about these services or need assistance securing an accommodation, please contact our Disability Services Facilitator (DSF). The Commission's DSF works to ensure that the Commission complies 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. Programs operated or otherwise funded by the NYC Commission on Racial Equity are required to make reasonable accommodations necessary to enable people with disabilities to participate in programs, services and activities. Language interpretation, captioning services, and other assistive technologies are available upon request.

Accessibility Plan

Physical Access

As a relatively newly established entity, CORE does not yet have a permanent space for our staff and agency operations. Through early January 2025, our agency was located on the 9th floor of 253 Broadway New York, NY 10007. As of the middle of January 2025, the Commission on Racial Equity will be housed within a DCAS-owned space at 233 Broadway on the 5th floor within the Law department. CORE expects to identify and move into a permanent and accessible office space by July 2025.

The Department of Citywide Administrative Services ("DCAS") is responsible for common areas in the city-owned buildings listed above. Agencies are responsible to assess common areas in the leased spaces listed and will work with landlords to address the findings of those assessments. The Commission is responsible for the agency demised areas (the offices themselves). Please see DCAS's Five Year Accessibility plan for information on the public common areas of the city-owned buildings.

CORE will do a self-assessment accessibility survey for our demised areas as well as any plans with respect to leased spaces. CORE will utilize this self-assessment to



address access issues, including, where applicable, alterations or structural changes to facilities or premises, planned upgrades or investments in technology.

In working within NYC communities, reasonable accommodations can be made by making the requests known when participants register for events or by emailing <u>AccessCORE@core.nyc.gov</u>. CORE will ensure that flyer templates provided to community partners include language about who to reach with inquiries around accessibility requests. Requests must be made within five business days prior to the event date.

CORE has implemented or will seek to implement processes, alterations and systems to improve physical accessibility in the common areas and its office, including:

Access Issues	Action Steps	Lead	Timeline
Identify Accessibility issues at temporary location	Work with DCAS to make necessary accessibility upgrades to our facility.	Director of Operations and Administration (DOA)	1 Years
Identify Accessibility issues at permanent location	Work with DCAS to make necessary accessibility upgrades to our facility.	DOA	2 years
Lack of mention of access in events coordinated by community partners	Create sample accessibility language and templates for partner organizations	Director of Community Organizing and Engagement (DCOE)	1 Year

Digital Access and Effective Communications

CORE works closely with the New York City Office of Technology and Innovation (OTI) to launch and update our website and other digital tools to support our work. Written and multimedia products are published on CORE's website and advertised to the public via email and social media.

CORE values the contributions of all New Yorkers and as such, works to expand the effectiveness of our communication on a continuous basis. CORE is committed to providing alternative text for images posted on social media, using the various platforms' built in *alt-text* mechanisms, providing closed captioning for videos posted on social media platforms that support closed captions, and using text that has no or low serifs in order to improve access to all New Yorkers.

Recognizing the need for vital assistive technologies, CORE staff will work to make such resources available upon request by the public, including ASL, captioning services, large print and audio recordings. In the case of scheduled meetings or events, these



requests must be made known to Commission staff at least five days in advance, to allow for sufficient time to contact and schedule any necessary additional services.

CORE uses SendGrid to send its mass or automated emails, publications and any other related information. The agency will explore accessibility features of this product.

Access Issues	Action Steps	Lead	Timeline
Lack of a digital inclusion officer	Designate a digital inclusion officer and connect them to required MOPD training and additional resources on accessible media	Executive Director and DSF	2 –3 months
Lack of policies and/or procedures related to the creation of accessible media	Create a policy for the creation of accessible media	Digital Inclusion Officer (DIO) and the Director of Communications (DC)	1 Year
Lack of training on the creation of accessible media	Create a training and guide regarding the creation of accessible media	DIO and DSF	1 Year
Refine policy regarding creation of accessible media	Evaluate and change internal policy regarding creation of media to ensure accessibility is incorporated	DC and DIO	2 years

In addition to the above, CORE will continue to conduct self-evaluations of its digital content and communications to identify barriers and improve digital access.

Programmatic Access

CORE's provides programs to NYC communities through community-based organizations and contractors in addition to organizing in person, virtual and hybrid events including discussions, slide show presentations and multimedia explanatory products. Virtual presentations are conducted over Microsoft Teams or Zoom, for which CORE strive to include dial-in options when possible. Close captions, transcripts, ASL and other accommodations are available upon request by the public. CORE is committed to ensuring the maximum accessibility of any shared materials upon request.

CORE will work to ensure that events are held at locations that have accessible entrances, restrooms, and seating. CORE will distribute guidance around accessibility to help Community partner staff, youth and families provide services that are inclusive of the diverse communities across NYC. Eventbrite and other promotional materials for events that are hosted directly by CORE will specify contact information to communicate accessibility needs.



The Commission will assess accessibility and the impact on people with disabilities when the agency launches a new program, initiative or makes a change to an existing program.

Access Issues	Action Steps	Lead	Timeline
Limited structure in addressing accessibility in development of CORE programs	Create a checklist for accessibility considerations to use for new projects	DSF and DIO	1 year
Lack of training and awareness	Create training for staff regarding plain language and other accessibility concerns	DSF and EEO Officer	1 year
Lack of mention of access in events coordinated by community partners	Create sample accessibility language and templates for partner organizations	Director of Community Organizing and Engagement (DCOE)	1 Year

In addition to the above, CORE will continue to conduct self-evaluations of its programming to identify barriers and improve accessibility.

Workplace Inclusion

CORE has been engaged in considerable efforts to ensure that it adheres to the New York City's (City) EEO policies and that its reasonable accommodation process is compliant with applicable federal, state, and local laws. This includes providing tools, technology, workspaces, social and recreational events, and trainings that are accessible to all employees. Staff who require any disability related accommodations are directed to contact CORE's Director of Operations and Administration who will work with DCAS to identify an Equal Employment Opportunity (EEO) officer able to address the request for reasonable accommodation. To increase and improve disability access, CORE will continue to take the following steps:

- Incorporate the Citywide EEO Policy into CORE's Code of Conduct and Employee Handbook. CORE's policy will require all employees to read, review, and sign the Code of Conduct and Employee Handbook upon hire, and to review those materials annually.
- 2. Review, assess, and amend, where necessary, its internal policies and procedures to incorporate accessibility equity into CORE's core operations with respect to its employees and their interactions with members of the public.
- 3. CORE's employees will receive instructions on how to file a reasonable accommodation request. These instructions will be re-issued on a regular basis and will also be available upon request.



4. CORE Director of Operations and Administration will coordinate with DCAS and available EEO officers to address reasonable accommodation requests. In instances where CORE may need to work with other city agencies to satisfy an employee's reasonable accommodation request, CORE will do its best to satisfy the request in a reasonable time frame.

To continue building a diverse workforce and increase access to employment, CORE is committed to ensuring that its recruitment, assessment, and on-boarding processes are fair and accessible to all applicants and potential employees. Absent an undue hardship or a direct threat, the agency will continue to provide reasonable accommodations for applicants and employees with disabilities. Reasonable accommodations can include a change in the workplace environment (such as modifying facilities or providing equipment), rule, or practice (such as when breaks are taken or how job tasks are performed). CORE will take the following steps to ensure compliance with this standard:

- 1. Specifying that requests for reasonable accommodations are available for applicants and employees with disabilities. CORE will add language explaining how to request accommodations on all interview confirmations, letters, emails.
- 2. Ensuring that reasonable accommodations and information for requesting accommodations is included in all interview confirmation communications sent to job applicants.
- 3. Ensuring pre-employment and on-boarding process documents and forms are in accessible formats like large print and braille.
- 4. When making offers of employment, successful candidates will be notified that accommodations are available upon request.

CORE is committed to ensuring that the accessibility needs of employees with disabilities are taken into account with regard to performance management, career development, and redeployment processes. Human Resources' policies and procedures will be reviewed to ensure that the accessibility needs of employees with disabilities, as well as individual accommodation plans, are taken into account when:

- 1. Using performance management processes.
- 2. Providing career development and advancement opportunities.
- 3. Redeploying employees with disabilities.

Training

Training is an important aspect of providing accessible programs and services. It is essential to ensure that everyone, including people with disabilities, can access CORE's programs, services, and digital content. To help ensure that CORE operates in a manner that is respectful to and inclusive of persons with disabilities:



- 1. Every two years, CORE's employees will be required to take the Disability Awareness and Etiquette training through the Mayor's of People with Disabilities (MOPD) and the Department of Citywide Administrative Services (DCAS).
- 2. In co-ordination with MOPD, CORE will incorporate methods for communicating with persons who are deaf or hard of hearing, blind, or have low vision into its language access training for employees.
- All staff will participate in a mandated training on: Every Body Matters: EEO and Diversity & Inclusion LGBTQIA+ Diversity & Inclusion training every two years. (2025, 2027)
- 4. Managers/Supervisors will participate in a training on Structured Interview Training and Unconscious Bias training every two years. (2025, 2027)
- 5. The Director of Operations and Administration will support inclusive environments in our day-to-day operations and track intended outcomes through the completion and Annual and Quarterly Diversity, Equity, Inclusion and EEO Reports.

Access Issues	Action Steps	Lead	Timeline
Lack of EEO officer	Reviewed existing city materials and we have applied to OMB for an EEO role.	Executive Director	1 year
Lack of Reasonable accommodation request policy	Complete the Reasonable Accommodation request process and provide an in- service training to all employees	SLS and DOA	1 year
Disability Inclusive Recruitment	Develop strategies to conduct recruitment that is inclusive of disabled New Yorkers.	DOA	1 year
Mandated trainings	Identify required trainings that CORE staff will take.	DOA and Executive Director (ED)	1 year
Lack of knowledge of accessible communication strategies	Incorporate methods for communicating with persons who are deaf or hard of hearing, blind, or have low vision in LAIP	DSF & Language Access Coordinator (LAC)	1 year



Methodology and Assessment

This proposed 5-year accessibility plan was developed by CORE leadership under the stewardship of Disability Service Facilitator Lorenzo Van Ness and in consultation with CORE's Leadership and staff, including those identifying as persons with disabilities. The plan outlines our strategy to foster inclusion and ensure compliance with the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the New York State and City Human Rights Laws, and other applicable requirements. Guided by MOPD Self Evaluation Templates, the Commission will regularly evaluate and update its accessibility goals with the evolution of its programs and services and the receipt of input from community members and staff.

The Five-Year Accessibility Plan and Notice of Opportunity to Comment is to be posted on the Commission's website in conjunction with MOPD posting the plan and notice of opportunity to comment on the NYC Agency Accessibility Plans website and conducting outreach towards receiving comment. CORE looks forward to reviewing feedback received through the public comment process and will seek to consult additional resources to refine its plan prior to finalization.



Appendix A: Glossary

Access Design: The term "access design" means incorporating language justice, plain language, physical accessibility, civic service design, and other principles into communications, policies, and interactions, to reduce barriers to quality service and meaningful participation.

Communication access: Communications access refers to the concept that people with sensory disabilities can communicate (and be communicated with) on an equal footing with those who do not have such disabilities.

Disability: According to the ADA, "a physical or mental [condition] that substantially limits one or more major life activities, a record of having such an [condition], or being regarded as having such an [condition]." Disability Justice acknowledges that all bodies have needs and have the capacity to become disabled in a world that is not designed accessibly. Disabilities include but not limited to mobility related conditions, being Blind or Low Vision, being Deaf or Hard of Hearing, speech challenges, learning disabilities, developmental disabilities, mental health conditions and more.

Digital access: Digital access refers to providing individuals with disabilities access to the information or data involved by an alternative media, format, or technology that allows the individual to use the information or data.

Equity as an outcome shall mean the achievement of a city where the worth, talents, and contributions of all people are valued and recognized, irrespective of race, gender, sexual orientation, gender identity, age, mental or physical disability, national or ethnic origin, immigration status, education, or economic status, and where these characteristics of identity, whether taken individually or through the ways in which they intersect, are not predictors or determinants of economic, political, social, or psychological outcomes, as they neither confer privilege nor deny opportunities. Equity as a process means the closing of gaps in policy, practice, and allocation of city resources through the prioritization of access, opportunities, and resources to those people and communities with the greatest need, whether due to historical or current marginalization or oppression, underinvestment, disinvestment, or under-resourcing of those people and communities, or due to the way in which their intersecting characteristics of identity serve to magnify inequities.

Physical access: Physical access refers to the design and layout of buildings, outdoor environments, and products to make them usable by people with disabilities, particularly those with mobility related conditions.

Programmatic access: Programmatic access refers to an organization's policies and practices do not create barriers to inclusion. Eliminating programmatic barriers, such as communication and sensory barriers, creates programmatic accessibility.



Racial equity: The term "racial equity" shall mean, when referring to an outcome, the achievement of equity with a particular focus on race or the intersection of race with other characteristics of identity. When referring to a process, the term "racial equity" shall mean the closing of gaps in policy, practice, and allocation of city resources through the prioritization of access, opportunities, and resources to those people and communities who, based on or at least in part due to race, have historically faced or currently face marginalization or oppression, underinvestment, disinvestment, or underresourcing.

Workplace inclusion: Workplace inclusion based on disability refers to an inclusive workplace that values all employees for their strengths. It offers applicants, visitors, and employees with disabilities, whether visible or invisible, an equitable opportunity to succeed, to learn, to be compensated fairly, and to advance.



Appendix B: CORE's website accessibility statement

The NYC Commission on Racial Equity (CORE) does not discriminate on the basis of disability, or language access in the operation of its programs, services and activities and strives to be welcoming to and inclusive of people with disabilities.

NOTE: NYC CORE website is provided in English. However, the "Google Translate" option may assist you in reading it in other languages. Please note that "Google Translate" cannot translate all types of documents, and it should not be relied upon for vital information. NYC CORE does not guarantee the accuracy of the translation provided by this tool.

If you or someone you know needs a language related or disability-related accommodation in order to participate in a program or receive NYC CORE services (other than for employment), contact Lorenzo Van Ness, Director of Community Organizing and Engagement, Language Access Coordinator and ADA Coordinator/Disability Service Facilitator by:

Email: <u>AccessCORE@core.nyc.gov</u>

Mail: NYC Commission on Racial Equity, Attn: Lorenzo Van Ness 233 Broadway, 5th Floor New York NY 10279



Appendix C: Grievance Procedure

How to file language or disability access grievance?

You may file a grievance if you:

- Are denied a request for a non-employment-related reasonable accommodation of policies and procedures that will allow you to participate in our programs, services and activities.
- Have a complaint about our policies and procedures concerning access to a particular program or activity.
- Did not receive service from the Commission on Racial Equity because of the language you speak.

You can file a grievance anonymously and regardless of your immigration status. You are not required to leave your name or contact information, if you want to be anonymous. If you wish to file a grievance for any of the above reasons, you or your designee must do so within 60 calendar days of the alleged violation.

You can file grievances by emailing the Commission on Racial Equity Language Access Coordinator and Disability Service Facilitator at <u>AccessCORE@core.nyc.gov</u>. It helps if you can provide this information:

- Your name, address, phone number and/or email address
- A description of the problem
- Where and when it occurred
- Language you speak

Within 15 calendar days after we receive a grievance, NYC CORE will contact you to discuss the grievance and possible resolutions. Within 15 calendar days of that discussion, NYC CORE will respond in writing and, when appropriate, in a format accessible to the grievant, such as large print, Braille, or audio tape. The response will explain our position and offer options for resolution.

Appeals Process

The grievant or their designee may appeal an agency decision within fifteen (15) calendar days after the receipt of the response by mail to:

Linda Tigani

Chair and Executive Director NYC Commission on Racial Equity 233 Broadway, 5th Floor



New York, NY 10279

The appeal should be submitted in writing using the above address. Alternative means of filing an appeal, such as an in-person interview or an audio recording describing the incident or alleged violation may be made available for any grievant with disabilities upon request.

Timeline Following Filing of Appeal

NYC CORE will respond to the grievant in writing within sixty (60) calendar 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 NYC CORE's decision, and offer options for substantive resolution of the appeal, where applicable.

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

For more information, contact:

Lorenzo Van Ness Director of Community Organizing and Engagement, Language Access Coordinator and ADA Coordinator/Disability Service Facilitator 233 Broadway, 5th Floor New York, NY 10279 Email: <u>AccessCORE@core.nyc.gov</u>