

**New York City Civilian Complaint Review Board Local Law 12
Five-Year Accessibility Plan**

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Agency Mission and Background

The New York City Civilian Complaint Review Board (CCRB or Agency) is an independent City agency empowered to receive, investigate, hear, make findings, and recommend action on civilian complaints against members of the New York City Police Department (NYPD) that allege excessive or unnecessary force, abuse of authority, including biased-based policing and racial profiling, discourtesy, or the use of offensive language. The agency also investigates, hears, makes findings, and recommends actions on the truthfulness of statements made by a subject officer during the course of or in relation to the resolution of a CCRB complaint. The City Council recently authorized the CCRB to investigate past professional conduct in the course of performance of official duties by members of the NYPD against whom a covered entity has made a final determination that the member of service engaged in an act of bias or a severe act of bias within the past five years.

The CCRB is staffed entirely with civilian employees. The CCRB's Board is comprised of 15 members, with five members appointed by the Mayor, five appointed by the City Council (one from each borough), three designated by the Police Commissioner, one appointed by the Public Advocate, and the Chair jointly appointed by the Mayor and the Speaker of the City Council. Under the City Charter, the Board must reflect the diversity of the City's residents and all members must live in New York City. No Board member may have a law enforcement background, except those designated by the Police Commissioner, who must have prior experience as law enforcement professionals. Board members may not be public employees or serve in public office.

The Board reviews and makes findings on complaints and then forwards its findings and discipline recommendations to the Police Commissioner, who has final authority over police disciplinary matters. Pursuant to a Memorandum of Understanding between the NYPD and the CCRB, effective April 11, 2013, attorneys from the CCRB's Administrative Prosecution Unit prosecute most of the cases in which the Board substantiates misconduct and recommends Charges and Specifications, the most serious discipline.

In fulfillment of its mission, the CCRB pledges to encourage members of the community to file complaints when they believe that they have been victims of police misconduct, respect the rights of civilians and officers, encourage all parties to come forward and present evidence, expeditiously investigate misconduct allegations thoroughly and impartially, make fair and objective determinations on the merits of each case, offer civilians and officers the opportunity to mediate complaints, when appropriate, recommend disciplinary actions that are measured and appropriate, engage in community outreach, report relevant issues and policy matters to the Police Commissioner and the public, and advocate for policy changes related to police oversight, transparency, and accountability that will strengthen public trust and improve police-community relations.

Statement of Commitment

As an agency that interfaces with members of the public, many of whom are from underserved or marginalized communities, the CCRB is aware of the importance of providing equal access for all New Yorkers. The CCRB is committed to creating an inclusive and accessible environment for all. As such, the CCRB has developed a five-year accessibility plan outlining the efforts it intends to undertake to improve access to agency services, programs, and facilities for persons with disabilities, identify and reduce or eliminate barriers to accessibility, and promote an environment of inclusion, respect, and understanding. The agency will continually strive for more equal access for persons with disabilities.

Executive Summary

The CCRB is committed to equity both in its workforce and in its service to the public. In consultation with the Mayor's Office for People with Disabilities (MOPD), the CCRB has developed a five-year accessibility plan, pursuant to Local Law 12 of 2023 (Local Law 12), that seeks to improve accessibility in the following areas:

Physical Access: Seek to remove accessibility barriers to the CCRB Board Room, which is used to host various meetings, programs, and events. Continue to evaluate its facilities for compliance with the Americans with Disabilities Act (ADA) and to improve accessibility for all members of our community.

Digital Access: Strive to meet website accessibility guidelines, improve compatibility of our digital content with assistive technologies, and train employees on effective digital communication for persons with disabilities.

Effective Communication: Endeavor to provide or improve availability of accessible documents, interpretation services, assistive listening devices, and captioning/transcription services.

Programmatic Access: Provide communication services and assistive technology as needed, implement disability awareness training, and conduct periodic internal accessibility evaluations to identify ways to improve accessibility and reduce barriers to persons with disabilities.

Workplace Inclusion: Continue to follow the City's reasonable accommodation and EEO policies and make efforts to improve accessibility for employees and recruit a diverse workforce.

This plan was developed as a result of a preliminary self-evaluation of the CCRB's current accessibility accommodations, policies, and practices to identify areas that present immediate accessibility concerns. It was informed by consultations with CCRB's Equal Employment Opportunity (EEO) Officers, Executive Director, General Counsel, Operations Unit, Human Resources, and Deputy Executive Director of Administration/Disability Service Facilitator (DSF) who, through their various roles, have an understanding of accessibility issues and agency capabilities.

The purpose of this plan is to outline the efforts that the CCRB plans to make to identify and reduce barriers for persons with disabilities, develop ways to better promote accessibility, and comply with the ADA and other legal requirements. The plan focuses on building upon the accessibility infrastructure already in place at the agency.

Beginning May 1, 2025, as required by Local Law 12, the CCRB shall post to its website and submit to MOPD an annual progress report specifying the accessibility achievements made in the previous fiscal year with respect to its five-year plan. Beginning May 1, 2027, and triennially thereafter, the agency will post to its website and submit to MOPD an updated five-year accessibility plan.

Online Resources

The CCRB's website contains a [Disability Access Services Info Page](#) that provides useful information for individuals with disabilities, including:

1. Anti-Discrimination Policy
2. Grievance Procedures
3. Reasonable Accommodation Requests
4. Language Access Services

The [Grievance Procedures](#) and [Website Accessibility Statement](#) are appended as Appendix A and B, respectively.

Requests for Accommodations and Disability Service Facilitator

The CCRB does not discriminate on the basis of disability in the operation of its programs, services, or activities. Pursuant to the ADA and the New York State and New York City Human Rights Laws, individuals with disabilities are entitled to request reasonable accommodations necessary to enable them to participate in programs, services, and activities. Reasonable accommodation requests can be made for services or assistance by contacting the DSF listed below.

The DSF coordinates agency efforts to comply with and carry out the agency's responsibilities under the ADA and other federal, state, and local laws and regulations concerning access to agency programs and services by persons with disabilities.

The CCRB's Disability Service Facilitator is:

Jeanine Marie
Deputy Executive Director for Administration
Civilian Complaint Review Board
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-2092
Email: jmarie@ccrb.nyc.gov

If you think that you or someone you know has been treated unfairly because of a disability, you may send a complaint to the CCRB's EEO Officers:

Yojaira Alvarez
Principal EEO Officer
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-7275
Email: yalvarez@ccrb.nyc.gov

Ifeamaka Igbokwe
Deputy EEO Officer
Civilian Complaint Review Board
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-2075
Email: iigbokwe@ccrb.nyc.gov

Agency Plan

Physical Access (Implementation timeframe: 2024-2028)

The CCRB's office is a leased space located on the 10th Floor at 100 Church Street, New York, New York 10007. It occupies the entire floor. In consultation with the lessor, building entrances and interior spaces will be evaluated for accessibility to persons with disabilities when accessing programs and services. The CCRB has implemented or will seek to implement processes and systems to improve physical accessibility in the common areas and its occupied spaces, including:

Common Areas of 100 Church Street

1. In the Fall 2023, the lessor installed a push-button automatic door at the entrance of Church Street.
2. In June 2023, new flushometers were installed in the wheelchair-accessible bathrooms.
3. The CCRB will work with the lessor to evaluate the accessibility and ADA compliance of the reception/security desk located in the lobby of 100 Church Street.

CCRB Occupied Spaces at 100 Church Street, 10th Floor

1. Access doors in employee-designated areas were upgraded so that once enabled by an employee access card, handles do not need to be turned for doors to be opened and closed.
2. The elevators in CCRB occupied spaces at 100 Church Street are ADA compliant. The doors remain fully open for at least three seconds so that those with disabilities have ample time to safely enter and exit the elevator car. The call buttons are easy to utilize. Braille signage is located next to the floor numbers listed on the elevator's control panel. The 10th Floor elevator lobby will be evaluated for improved accessibility.
3. The 10th floor reception area has enough space to accommodate wheelchairs, powered mobility devices, or manually-powered mobility aids. The flooring allows for easy maneuvering of a wheelchair or other powered mobility device. The reception area will be continually evaluated for improved accessibility.
4. The CCRB has ADA compliant bathrooms available, with wider doorways, non-slip flooring, and wheelchair, mobility device, or mobility aid accessibility. Faucets are one-hand operated and do not require pressure placed on the wrist.
5. The CCRB will evaluate whether the time to open the doors following activation of the exit button for egress into the 10th floor lobby is sufficient to allow persons with disability to exit.
6. The 10th Floor Board Room is a multipurpose room used for meetings, events, orientations, and classes. It is equipped with audiovisual equipment and furniture.

There are three non-adjustable tm/lecterns with audiovisual controls in the room. The CCRB will explore ways of improving accessibility in the Board Room for persons with disabilities, including the availability of portable and/or adjustable microphones.

7. The agency will review whether additional signage or way-finding markers are needed.
8. The agency will post larger print versions of the building plan and exit routes.
9. The CCRB will identify and make efforts to remove hallway/walkway obstructions that may impede access or ingress/egress.

Digital Access (Implementation timeframe 2024-2028)

The CCRB is committed to ensuring that its digital content is accessible to and usable by people with disabilities.

1. **Website Accessibility:** The CCRB will continue to strive to meet Web Content Accessibility Guidelines 2.1 Level AA for public-facing and internal websites.
2. **Digital Document Accessibility:** The CCRB will take steps to make digital documents accessible and will provide accessible versions of documents upon request. The agency will implement process(es) so that electronic documents are reviewed for accessibility prior to public distribution.
3. **Assistive Technology Compatibility:** The CCRB will review and analyze its digital systems and platforms to determine if there are ways to improve compatibility with assistive technologies, including screen readers, speech recognition software, and alternative input devices.
4. **Training and Awareness:** The CCRB will seek to train employees regarding best practices for digital accessibility. The DSF and/or EEO Officer(s) will keep abreast of and attend training and/or programs relating to disability access.
5. **Feedback and Testing:** The CCRB will seek feedback from persons with disabilities to identify areas for improvement.

In addition to the above, the CCRB will continue to conduct self-evaluations of its digital content to identify barriers and improve digital access, as set forth in the Local Law.

Effective Communication (Implementation timeframe 2024-2028)

To ensure effective communication in the CCRB's programs and services, the following steps will be taken:

1. **Accessible Documents and Forms:** The CCRB will strive to ensure that documents, presentations, reports, and handouts are available, upon request, in accessible formats such as large print, high-contrast, or electronic formats.

2. **Sign Language Interpretation:** When requested, the CCRB will provide sign language interpretation services, including having qualified interpreters available, upon request, during interviews, Board meetings, presentations, and events.
3. **Assistive Listening Devices:** When requested, the CCRB will work to provide assistive listening devices such as personal amplifiers or audio induction loop systems.
4. **Captioning and Transcription Services:** When requested, the CCRB will offer real-time captioning or transcription services through live captioning services or by making transcripts available.
5. **Communication Access Realtime Translation (CART):** CART services are already provided, via a trained provider that transcribes written text in real time, as standard practice at monthly CCRB Board meetings. For other programs and events, CART services will be provided upon request.
6. **Training for Staff:** The CCRB will seek to train employees in effective communication techniques when interacting with persons with disabilities.

Programmatic Access (Implementation timeframe 2024-2028)

1. **Accessibility Evaluation:** The CCRB will evaluate physical spaces, including facilities and meeting rooms, to identify barriers and areas for improvement. In conjunction with the lessor, building entrances and interior spaces will be evaluated to ensure that they are accessible to persons with disabilities when accessing programs and services. Remote access to meetings, events, and programs will be available to staff and members of the public.
2. **Communication Services:** The CCRB will seek to implement measures to ensure effective communication, including continuing to provide sign language, captioning, or transcription services for programs, when requested.
3. **Assistive Technology:** The CCRB will work to provide, upon request, appropriate assistive devices and equipment in meeting spaces and offices.
4. **Training and Awareness:** The CCRB will train employees on disability awareness, including on how to interact respectfully and effectively with persons with disabilities.
5. **Programs and Initiatives:** The CCRB's Civilian Assistance Unit (CAU) is accessible to civilians involved in CCRB complaints, especially when accessing programs and services. The CAU helps individuals navigate the investigative process after filing a CCRB complaint. The CAU has digital tools available to assist with remote meetings.
6. **Continuous Evaluation and Review:** The CCRB will solicit feedback and conduct regular internal evaluations of the accessibility of its offices, facilities, and meeting spaces. It will also implement processes so that accessibility, and

the impact on people with disabilities, are considered when the agency launches a new program or initiative or makes a change to an existing program or service.

Workplace Inclusion (Implementation timeframe 2024-2028)

The CCRB makes considerable effort to ensure that it adheres to EEO Policies and that its reasonable accommodation process is compliant with applicable federal, state, and local laws.

The CCRB has taken or will take the following steps:

1. Incorporated the Citywide EEO Policy into the CCRB Code of Conduct and CCRB Employee Handbook. The CCRB's current policy requires 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 CCRB's core operations with respect to CCRB employees and their interactions with members of the public.
3. CCRB employees receive instructions on how to file a reasonable accommodation request. These instructions are re-issued on a regular basis as well as upon request.
4. The CCRB's Human Resources Director plays a crucial role in the coordination and resolution of reasonable accommodation requests in conjunction with the agency's General Counsel and Executive Director. Human Resources manages a dedicated electronic mailbox for reasonable accommodation requests and schedules cooperative dialogues in a timely and efficient manner.

To build a diverse workforce and create greater access to employment, the CCRB continues to utilize the 55-a Program to hire qualified individuals with disabilities. The CCRB is committed to ensuring that its recruitment, assessment, and on-boarding processes are fair and accessible to all applicants and potential employees. The agency will continue to provide reasonable accommodations for employees and applicants with disabilities. The CCRB has taken the following steps to ensure compliance with this standard:

1. Specifying that accommodation is available for employees and applicants with disabilities.
2. When making offers of employment, successful candidates are notified that accommodations are available upon request.

The CCRB 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 CCRB programs, services, and digital content. To help ensure that the CCRB operates in a manner respectful to and inclusive of persons with disabilities:

1. CCRB employees will be required to take the Disability Awareness and Etiquette training through the Department of Citywide Administrative Services (DCAS).
2. In coordination with MOPD, the CCRB has incorporated methods for communicating with persons who are deaf or hard of hearing into its language access training for employees.

Methodology

To identify barriers and devise plans to improve disability access at the CCRB, the DSF, with assistance from employees from various units, worked to evaluate existing CCRB policies and procedures and the accessibility of the CCRB's offices, facilities, programs, and services. Following this internal evaluation, potential barriers to access were noted. This working group will meet regularly to identify and review accessibility issues and the agency's ability to implement measures to remove barriers and improve accessibility.

The EEO Officer(s), Executive Director, General Counsel, Deputy Director of Administration/DSF, and Human Resources will continue to meet monthly to review employee demographic data and data from the Citywide Equal Employment Database System ("CEEDS") to identify issues related to inclusion and accessibility.

The CCRB will post this five-year accessibility plan on its website [CCRB Disability Access Plan](#).

Appendix A

Anti-Discrimination Policy for People with Disabilities in Access to Services

The CCRB 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. The CCRB 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.

Members of the public needing disability related reasonable accommodations or language assistance to participate in CCRB programs, services, or activities can email accessibility@ccrb.nyc.gov or contact the persons below:

Designated Disability Services Facilitator

Jeanine Marie
Deputy Executive Director for Administration
Civilian Complaint Review Board
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-2092
Email: jmarie@ccrb.nyc.gov

Language Access Coordinators

Edwin Peña and Jessica Peña
Email: language.access@ccrb.nyc.gov

Grievance Procedure for Members of the Public Alleging Discrimination Based on Disability

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

- name, address, telephone number and/or email of the person filing grievance.
- information about what happened and where, such as the location, date, and description of the incident or alleged violation.
- names and job titles of any CCRB employees involved, if available.

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 incident, to:

Principal EEO Officer
Yojaira Alvarez
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-7275
Email: yalvarez@ccrb.nyc.gov

Deputy EEO Officer
Ifeamaka Igbokwe
100 Church Street, 10th Floor
New York, New York 10007
Phone: 212-912-2075
Email: ijgbokwe@ccrb.nyc.gov

Alternate means of filing complaints will be made available for persons with disabilities, upon request.

Appendix B

CCRB Website Accessibility Statement

The CCRB 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. It defines three levels of conformance: Level A, Level AA, and Level AAA. Our digital content is partially conformant with WCAG 2.1 level AA. Partially conformant means that some parts of the content do not fully conform to this accessibility standard.

Feedback

We welcome your feedback on the accessibility of our digital content. Please let us know if you encounter accessibility issues by using the [Website Accessibility Feedback Form](#).

If you need assistance accessing a particular program or service, please reach out to the CCRB's Disability Services Facilitator at 212-912-2092 or jmarie@ccrb.nyc.gov.

Assessment Approach

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

Date

This statement was created on 03/1/2023.