



NEW YORK CITY COMPTROLLER  
**BRAD LANDER**

---

# Five-Year Accessibility Plan

BUREAU OF PUBLIC AFFAIRS

**MARCH 2024**



# Contents

<b>A Message from the Comptroller .....</b>	<b>1</b>
<b>Background .....</b>	<b>3</b>
Contact Information .....	3
Agency Mission.....	3
<b>Accessibility Commitment Statement.....</b>	<b>4</b>
<b>Executive Summary.....</b>	<b>6</b>
<b>Agency Plan.....</b>	<b>6</b>
Physical Access .....	6
Accessible Work Areas.....	8
Eating Areas.....	8
Evacuation Procedures .....	8
<b>Programmatic Access .....</b>	<b>9</b>
Centering Accessibility in Our Work .....	9
Events & Employee Programming .....	10
<b>Effective Communications.....</b>	<b>11</b>
<b>Workplace Inclusion.....</b>	<b>12</b>
Reasonable Accommodations .....	12
Disability-Inclusive Recruitment .....	13
Grievance Process Under the American with Disabilities Act (ADA) .....	15

**Digital Accessibility ..... 16**

    Web Accessibility Statement ..... 17

    Feedback Form ..... 17

    Website Audits..... 17

    Best Practices..... 18

    WCAG Guidelines..... 18

**Methodology ..... 21**

# A Message from the Comptroller

Dear New Yorkers,

I am pleased to present the first-ever Five-Year Accessibility Plan at the New York City Comptroller's office, which was written under the guidance of the Mayor's Office for People with Disabilities per Local Law 12 of 2023 and in direct consultation with advocates and people with disabilities. This Accessibility Plan is a comprehensive roadmap that aims to delineate enhancements in [Physical Access](#), [Digital Access](#), [Programmatic Access](#), [Communications](#), and [Workplace Inclusion](#) in a manner that centers the dignity, autonomy, and independence of people with disabilities.

Indeed, this plan is an important cornerstone of our accessibility and equity work and our commitment to deploy the tools of this office to effectuate real change in the lives of everyday New Yorkers with disabilities.

Looking back at last year, Disability Justice became a top priority of our office beyond the bully pulpit. We hired our first Constituencies Liaison for People with Disabilities at the NYC Comptroller's office, Nicholas Astor. A month into the role, he was planning our first Disability Justice roundtable where we heard directly from disability rights activists and advocates on transportation and economic empowerment issues to help inform our work, ranging from potential audit recommendations to budget analyses. Leading up to the meeting, he set up a mock event with American Sign Language (ASL) interpreters and our Special Events Unit and Bureau of Information Systems and Technology to ensure our office was providing accurate interpretation services.

In August 2023, our Policy Team released a special education services [report](#), revealing a tenfold spending increase on special education service claims in the last decade. The Office of the New York City Comptroller (OOC) also offered recommendations for reform to ensure that all children receive the support they need that works for families and is cost-effective for the City as well.

Later that year, our Digital Inclusion Officer conducted a web accessibility audit, finding that our web templates were on average 97% web accessible in accordance with WCAG 2.1 AA standards. We intend to maintain an average web compliance score of 90% or greater. At the end of the year, our Bureau of Public Affairs began working closely with our Bureau of Administration to partner with AHRC NYC to bring in qualified individuals with disabilities into our summer internship program. We also are exploring partnerships with other programs that cater to people with disabilities because we believe a diverse workforce is a strong one.

Additionally, our office participated in the NYC's 2023 Disability Pride Parade, and it was great to be together with everyone for the first Disability Pride Parade since the COVID-19 pandemic and an honor that our parade contingent was named "The Most Spirited Group." Visibility is immensely important to help push the needle on disability rights issues, which is why we are very excited to be co-sponsoring NYC's Disability Pride Parade in 2024.

I trust that the Five-Year Accessibility Plan from this office serves as a valuable guide and pathway, contributing to the City's improved accessibility for everyone and an opportunity to help create an anti-ableist culture through all of our projects and initiatives.

If you have any questions about our plan, please send an email to [accessibility@comptroller.nyc.gov](mailto:accessibility@comptroller.nyc.gov). You can also browse through our plan online at [Five-Year Accessibility Plan](#). Thank you for your continued support.

In solidarity,

A handwritten signature in black ink, appearing to read "Brad Lander".

Brad Lander  
New York City Comptroller

# Background

[Local Law 12 of 2023](#), codified as NYC Administrative Code Section 23-1004, requires City agencies to develop and implement a Five-Year Accessibility Plan in consultation with the Mayor’s Office for People with Disabilities (MOPD). The plan is meant to “ensure that the agency’s workplace, services, programs and activities are accessible to and accommodating and inclusive of persons with disabilities.”

Under Local Law 27 of 2016, codified as NYC Administrative Code Section 23-1002, City agencies are required to appoint a Disability Service Facilitator (DSF). The DSF coordinates agency “efforts to comply with and carry out the agency’s responsibilities under the American with Disabilities Act of 1990 (ADA) and other federal, state and local laws and regulations concerning accessibility to programming and services by people with disabilities.” The DSF liaises with New Yorkers with disabilities, connecting them with the services and programs offered by City government.

The DSF for the OOCand is responsible for preparing and updating OOC’s Accessibility Plan.

## Contact Information

Members of the public wishing to get in touch with our office for help with a particular issue or to suggest an audit can visit our website at <https://comptroller.nyc.gov/about/contact-our-office/#help-hotline> or call our help hotline at 212-669-3916.

Employees or members of the public who need assistance with accessibility concerns or would like to request a copy of OOC Accessibility Plan in an accessible alternate format, should contact the DSF Nicholas Astor at [accessibility@comptroller.nyc.gov](mailto:accessibility@comptroller.nyc.gov) or 212-669-4736. You can also send mail to Nicholas Astor at 1 Centre Street, 5th Floor, New York, NY 10007.

## Agency Mission

The Office of the New York City Comptroller works to promote the financial health, integrity, and effectiveness of New York City government, to strengthen trust, secure a thriving future for all New Yorkers, and build a more just, equitable, and resilient city.

Led by an independently elected citywide official, the office provides checks and balances needed to hold City government accountable for budgeting wisely, investing responsibly, operating

efficiently, acting fairly, living up to its obligations and promises, and focusing on the long-term challenges we face together.

# Accessibility Commitment Statement

The OOC is committed to ensuring accessibility and equitable access for all individuals, including people with disabilities. It is a core component of our work to deploy the tools of the office in ways that address and confront all forms of inequity, including ableism. We are also committed to pushing ourselves to address issues of equity and accessibility internally and as a workplace.

The OOC is committed to fostering a diverse, equitable, inclusive, and respectful work environment that provides equal opportunities for all and is free of discrimination, harassment, and retaliation. The OOC recognizes that having diversity across each of our teams benefits our employees, improves retention, and boosts morale. Additionally, we believe that having a culturally responsive team that reflects the diverse city we live in strengthens our ability to better serve New Yorkers.

The OOC is an equal opportunity employer that will not tolerate discrimination or harassment of any kind against employees and/or applicants for employment on the basis of actual or perceived age, race, color, national origin or ethnicity, immigration or citizenship status, religion or creed, gender/sex (including pregnancy, childbirth, or related medical conditions, sexual harassment, gender identity or expression), disability, status as a current or former military service member, arrest or conviction record, marital or partnership status, caregiver status, genetic information or predisposing genetic characteristics, sexual orientation, unemployment status, consumer credit history, familial status, salary history, sexual and reproductive health decisions, cannabis use, pre-employment marijuana testing, status as a victim/survivor of domestic violence, sex offenses, or stalking, or other non-merit based factors (collectively “protected status”). The Equal Employment Opportunity (EEO) Policy of the OOC is intended to implement this commitment.

It is also the OOC policy that none of its employees or job applicants will suffer retaliation or harassment for raising good faith complaints of discrimination; opposing discrimination; participating (in any way) in an employment discrimination investigation or lawsuit; or engaging in any other protected activity.

Consistent with local, state, and federal laws governing reasonable accommodations, the OOC will endeavor to accommodate specific needs to allow employees and applicants to apply for a



job, perform the duties of a job, or enjoy equal benefits and privileges of employment that are enjoyed by similarly situated employees. It is a privilege to welcome employees from across demographic and lived experiences onto our team.

Any employee or applicant who believes they have been subject to discrimination, retaliation, or harassment should contact the EEO Officer or the General Counsel's Office.

**EEO Officer**

Diane Jones Randall

[eeo@comptroller.nyc.gov](mailto:eeo@comptroller.nyc.gov)

**EEO Counselor**

Sherry Williams-Nisbett

[swillia@comptroller.nyc.gov](mailto:swillia@comptroller.nyc.gov)

**General Counsel Division**

[Generalcounsel@comptroller.nyc.gov](mailto:Generalcounsel@comptroller.nyc.gov)

The OOC will provide a prompt, thorough, and impartial investigation into any report of an alleged violation of the EEO Policy. Immediate and proportionate corrective action will be taken if it is determined that discrimination has occurred. The full EEO Policy is available to all OOC employees on the agency intranet site.

# Executive Summary

This plan is designed to affirm the OOC's commitment to ensuring equity and accessibility for our employees as well as members of the public in accessing the information, services, and programs provided by the office. In accordance with Local Law 12 of 2023 and the template provided by the Mayor's Office of People with Disabilities (MOPD), this plan addresses accessibility in the following areas: (1) Physical Access, (2) Digital Access, (3) Programmatic Access, (4) Communications, and (5) Workplace Inclusion.

The Accessibility Plan details the steps the OOC is currently taking and outlines our goals over the next five years to ensure that our workplace, services, programs, and activities are accessible to and inclusive of people with disabilities. The scope of the work described within is to be completed by 2028.

## Agency Plan

### Physical Access

The OOC occupies several floors and spaces at 1 Centre Street. The NYC Department for Citywide Administrative Services (DCAS) owns the building and is responsible for ensuring the building meets all physical accessibility requirements, including outdoor spaces adjacent to the building.

The OOC partially or entirely occupies 10 floors at 1 Centre Street, including the following spaces available to the public:

- 5<sup>th</sup> Floor North and South including Board Room
- 10<sup>th</sup> Floor Conference Room

As a tenant at 1 Centre Street, the OOC actively partners with DCAS to identify and address accessibility needs to the extent feasible. The OOC will memorialize its process for informing DCAS about acute accessibility issues and work to establish a service level agreement for repair.

The OOC will conduct an annual physical walkthrough to ensure that we continue to monitor and ensure accessibility. This walkthrough will be conducted by the Bureau of Administration in partnership with the DSF.

A preliminary review of public and OOC spaces at 1 Centre Street indicated several accessibility improvements that should be reviewed in partnership with DCAS to make the facilities more accessible:

- **Entrance Ramps:** All entrance ramps running slope should be 12 inches of ramp for every one inch of height.
- **Automatic Doors:** The “door-open” buttons at the 1 Centre Street entrance (North and South) often do not work.
- **Elevator Enhancements:** Explore adjustments to the elevators to accommodate accessibility needs, like auditory announcement when the elevator arrives at a floor and increase the amount of time the doors remain open.
- **Bathroom Sink Heights:** Ensure that sink heights in bathrooms accommodate wheelchair users.
- **Reception Areas:** The OOC reviewed the locations accessible to the public and has taken steps to improve the accessibility of the reception areas. Our Facilities team, in consultation with the DSF, continues to work to ensure that any area where the public may visit has ample space for mobility devices, no obstacles or obstructions in the common areas or areas surrounding the reception windows, and clear and accessible signage on and around the reception windows. The OOC commits to removing identified obstructions within six months after the publication of this plan as is feasible. If the removal of an obstruction requires DCAS intervention or the use of an external vendor, the timeline may be extended.
- **Lighting:** Improve our lighting for people with sensitivity issues.

Our Community Action Center (CAC) assists New Yorkers with complaints or inquiries about government services. CAC can be reached by phone at (212) 669-3916 or by email at [action@comptroller.nyc.gov](mailto:action@comptroller.nyc.gov). A teletypewriter (TTY)/ real-time text (RTT) line is available at 929-496-1937.

The OOC will work with DCAS to create a timeline to update the signage in its spaces to ensure that individuals visiting the OOC know who they can contact for assistance, if needed.

- **Meeting and Conference Rooms:** Meetings in which members of the public are invited are held in the 5<sup>th</sup> Floor Board Room and the 10<sup>th</sup> Floor Conference Room, both of which are located near elevator banks and accessible bathrooms. Before any event, the facilities staff ensures that the furniture in either space is configured in a way that allows for freedom of movement and is suitable for the needs of the event participants. The tables in both spaces are also accessible for participants using wheelchairs. Screens are also

available in both spaces for participants who attend virtually if they are not able to attend in-person.

In the first year of this plan, the OOC plans to improve the sound quality in the 5<sup>th</sup> Floor Board Room and assess the requirements for providing additional touchless microphones in our 10<sup>th</sup> Floor Conference Room. The OOC will also explore the feasibility of installing an assistive listening device in the 10<sup>th</sup> Floor Conference Room.

## Accessible Work Areas

The OOC's Facilities team is working to remove unused furniture, such as filing cabinets, tables and chairs to improve accessibility in common areas throughout the floors occupied by the OOC. The OOC is also exploring the feasibility and cost of adding Braille, raised lettering and larger print to office number plaques (outside OOC occupied suites).

The OOC has access to one gender neutral bathroom located in the 5th Floor Boardroom. The bathroom is not currently fully accessible, but we are working with DCAS to determine if the space can be modified, though funding will likely be required to complete any modifications.

In the first year of this plan the OOC plans to assess whether the bathroom can be modified, whether the signage can be improved, and work towards clearing obstructions to ensure spaces are accessible.

## Eating Areas

The OOC has a limited number of eating areas throughout the building. The main lunchroom on the 7<sup>th</sup> Floor is accessible by elevator and has a wide doorway as well as configurable tables to allow for access and mobility throughout the room.

In the first year of this plan, the OOC will review all food pantry spaces located in OOC occupied spaces for potential improvements to accessibility. If it is determined a space must be converted or renovated, we will need to request funding for this activity. Implementing any findings therefore will likely be in future years of this plan.

## Evacuation Procedures

The OOC coordinates with DCAS on the practice and execution of our Emergency Management and Building Evacuation plans. Specifically, employees self-identify to be placed on an accommodations list if they require assistance to exit the building in the event of an emergency

evacuation. Those self-identified employees requiring assistance receive an email from DCAS Fire Safety each day to account for employee physical attendance as the OOC remains on a hybrid work schedule. The OOC will also post the floor's Fire Warden's contact information in all high traffic public areas so that visitors can notify the Fire Warden of their location in the building. For all OOC public events we will of give a list of our expected guests that require assistance evacuating to the Fire Warden of the respective floor that the event is taking place.

In the event of an emergency evacuation, employees and visitors on the DCAS accommodation list are instructed to wait by the designated freight elevator for evacuation and the Fire Warden on each floor is instructed to appoint a volunteer to help employees who require assistance. The OOC is in the process of building an employee volunteer list with the contact information to ensure that Fire Wardens know who on their floor is willing and available to assist someone on the accommodation list in case of an emergency. The OOC will also ensure that there is more than one volunteer identified for each floor to assist individuals who require assistance.

In the first year of this plan, the OOC will memorialize and share the evacuation process for those employees who self-identify with DCAS and are on the accommodation list with the Fire Wardens and Bureau Leads. The OOC will also conduct annual meetings for those employees who need assistance to ensure evacuation procedures are adhered to.

## Programmatic Access

### Centering Accessibility in Our Work

The OOC strives to maintain a strong focus and shared vision of building a more equal and inclusive city with a thriving and inclusive economy. This means applying an equity lens when we deploy the multiple tools of the office (audits, budget analysis, contracting, investments, public finance, policy, public engagement, etc.), while also pushing ourselves internally and as a workplace on diversity, equity, and inclusion issues. This year the OOC is including accessibility as a strong area of focus across bureau workstreams.

This builds off work the OOC has done in the past year, including a report on [Carter Cases and Special Education service disparities](#) within New York City public schools as well as a [roundtable discussion](#) with over two dozen disability community advocates to open a dialogue about additional accessibility-focused work products the OOC would like to explore for inclusion in the 2024 work planning process. Additionally, in the early part of 2024, the OOC will begin to memorialize accessibility-focused external work on a dedicated [page](#) on the official OOC website.

# Events & Employee Programming

The OOC hosts social and educational activities both online and in-person to facilitate accessibility for all employees. In addition, the agency provides transportation to external events for employees in need of assistance by utilizing our fleet of vehicles. If an employee requires a Reasonable Accommodation to attend or participate in any event, they may contact the EEO Officer at [eeo@comptroller.nyc.gov](mailto:eeo@comptroller.nyc.gov).

In the first year of this plan, the OOC will develop a checklist for internal events that will include an assessment of disability accessibility.

Programming for members of the public ranges from large events such as town halls and cultural heritage celebrations to smaller-scale roundtables and meetings. For these events, the OOC provides an RSVP checklist for attendees to request reasonable accommodation up to two weeks before the event date.

Our planning process for external events includes the following considerations:

- Designation of a Special Events team member(s) to ensure accessibility of each event and facilitate requests for reasonable accommodations.
- Selection of event dates that allow sufficient time to secure accommodations that may be requested and avoid dates that conflict with major holidays and other culturally significant dates.
- Prior to selecting an event venue, the OOC will conduct site visits to ensure that the space is accessible for all by checking that:
  - Main entrance and bathrooms are wide enough to accommodate wheelchairs and scooters.
  - Elevators are functioning.
  - Ramps are accessible.
  - Bars are in bathrooms.
  - Doors are accessible via automatic opening or push-button access.
- Ensuring all event promotional material (flyers and invitations) contain accommodation notification for specific needs with a deadline for requests. Where applicable, attendees may request certain accommodation for dietary needs with timely RSVP.
- When applicable, offering materials and information to interpreters about the event in advance so they can properly prepare.
- Accommodating specific seating needs for attendees, including reserved seating near the front for attendees with vision, hearing, or other impairments.

- Providing Computer Aided Real-Time Transcription (CART) services, captioning, and/or ASL interpretation at all large-scale in-person, or online public events upon request, as well as providing quality translation and language services upon request.

In the first year of this plan, the OOC's Special Events team will:

- Designate an employee to escort and accompany individuals with disabilities that request to be guided to the event location and remain onsite to address any needs that may arise.
- Make good faith efforts to identify and utilize a roster of event venues across the City where:
  - Elevator button is maximum 54 inches from the ground.
  - Elevator beeps as it passes each floor. If not, designate staff to accompany any persons with visual impairments.
  - Bathroom sinks are no higher than 34 inches from the ground.
  - Braille or raised lettering is on signage.
  - Entrances are at least 32 inches wide.

## Effective Communications

Standard language has been provided to all Bureaus indicating that information for Reasonable Accommodations should be included in all interview coordination correspondence. Bureaus should contact the EEO Officer for guidance on the reasonable accommodation process for candidates. The Agency's EEO Office welcomes various forms of communication: in-person, telephone, videoconference, email, and other forms of digital communication. Multiple interview platforms are available as standard procedure.

All Hiring Managers are required to take periodic trainings on structured interviews and unconscious bias, utilizing the Applicant Tracking System to identify candidates and schedule interviews.

All employees are periodically made aware of exam filings.

In the first year of this plan, the OOC will establish the practice of targeted email communications to all 55-a employees<sup>1</sup> reminding them of exam filings. As part of the annual physical walkthrough, the OOC will also address on-site signage.

# Workplace Inclusion

## Reasonable Accommodations

Any employee – full-time, part-time, intern and temporary – may file a Reasonable Accommodation request to meet their accessibility needs. The Agency's EEO Office follows Reasonable Accommodation procedural guidelines.

Reasonable Accommodations enable employees with disabilities to do their jobs and accommodations that modify the workspace are not uncommon, including, but not limited to, work from home, ergonomic chairs, standing desks, footrests and other devices that will assist the employee.

A request for a Reasonable Accommodation is submitted to the EEO Officer for review, discussion, research, and to assist in the resolution of the matter. If a Reasonable Accommodation is granted, the agency may procure, deliver, and install any required equipment or devices at the employee's workspace. The EEO Officer and the Executive Director of Administration will review the workspace to ensure that any modifications allow for accessibility, safety, and comfort for the employee to perform their job. For any such requests, OOC maintains a pooled budget for administrative expenditures which supports the procurement of accessibility goods or services when Reasonable Accommodation request is granted.

Employees and candidates for employment may request a Reasonable Accommodation to meet their accessibility needs via a form available on the OOC's intranet. Information about the Reasonable Accommodation request process is shared annually with employee's agencywide, and is also available in the Employee Handbook and on the Agency's intranet. Information about Reasonable Accommodation requests for employment candidates will be shared during interview scheduling communication.

---

<sup>1</sup> <https://www.nyc.gov/site/dcas/employment/55-a-program.page>



The New York City Human Rights Law prohibits discrimination in New York City, in employment, housing and public accommodations. For more information, visit <https://www.nyc.gov/site/cchr/law/the-law.page>.

## Disability-Inclusive Recruitment

The OOC is currently undertaking the development of Bureau-level Strategic Employment Plans. The office also participates in the 55-a Program and currently employs 55-a participants. The OOC recently appointed a new 55-a Coordinator and is developing education materials for hiring managers and bureau leadership.

Internship and Fellowship opportunities will also be shared with college and university programs that provide support to students with disabilities.

In the first year of this plan, the OOC's Career Counselor will conduct targeted outreach to 55-a participants to ensure they are aware of civil service exam filings and are provided with guidance on how to reach their career objectives.

In the first year of this plan, in coordination with the Chief Equity Officer and DSF, the OOC will identify opportunities and develop partnerships that target recruitment of people with disabilities for vacancies, as well as review hiring documents, interview, and onboarding processes for accessibility improvements. Specifically, the OOC will develop a contact list of agencies and organizations that work with people with disabilities, so that job postings can be shared strategically.

The Agency also requires annual mandatory Disability Awareness and Etiquette trainings to educate and encourage employees to foster a climate of acceptance, diversity, and inclusion.

Employee Trainings are listed below:

### Topic Area / Course

- Diversity & Inclusion / Disability Awareness and Etiquette: Employees learn to recognize and understand the important role that people with disabilities play in a diverse and inclusive workforce.
- Management & Supervision / Performance Evaluations: Participants learn and practice methods for articulating clear expectations, assessing and rating performance fairly, and effectively communicating performance ratings at the employee appraisal conference.
- Management & Supervision / Structured Interviewing and Unconscious Bias: Participants examine the impact of unconscious bias on the employee interview and selection process.

- Health & Safety / Right-to-Know: Public employers in New York State are required to provide annual Right-to-Know Understanding Chemical Safety in the Workplace training for all staff.
- Diversity & Inclusion / LGBTQ-The Power of Inclusion: The Comptroller's Office remains committed to educating employees about transgender diversity and inclusion. The city's mandatory computer-based training focuses on the requirements under the Mayor's Executive Order 16 and strategies to develop, implement and normalize inclusive behaviors in all city agencies.
- Ethics / DOI Corruption Prevention Awareness: The Department of Investigation's Corruption Prevention Awareness training module teaches employees to recognize and guard against corruption, waste, fraud, and wrongdoing in the workplace.
- Ethics / Conflicts of Interest: The Conflicts of Interest Board training covers restrictions on giving and accepting gifts, outside employment, volunteering, political activities, and misuse of position.
- Health & Safety / Workplace Violence Prevention: Annual training for employees is required under the NYS Workplace Violence Prevention law to identify risks of violence in the workplace and preventive measures, including appropriate work practices, reporting and emergency procedures.
- Diversity & Inclusion / Sexual Harassment Prevention: This city-mandated eLearning trains employees to define sexual harassment, understand what they can do to prevent and respond to sexual harassment, and know how they can make a difference in the workplace.
- Diversity & Inclusion / Unconscious Bias: Participants learn to develop inclusive behaviors that will create an environment where all employees feel valued, included, and engaged; utilize their skill sets to better serve the vast diversity of all NYC communities; draw upon personal experiences to gain insight into inclusion.
- Business Continuity / Business Continuity & Disaster Recovery: This e-Learning introduces employees to the concepts of business continuity and disaster recovery and the plans in place to help manage through an event that disrupts normal business operations.
- Information Technology / Cyber Security: This session reviews key elements in today's cyber security threat landscape, the technology tools that the Agency has deployed to strengthen the office's security landscape and best practices to enhance the overall security profile for the Comptroller's office.
- Health & Safety / Video Display Terminal (VDT): This training is designed to ensure that all employees are aware of Article 18 of the Citywide Contract that focuses on the prevention or mitigation of VDT-related health problems for employees in the workplace by promoting safeguards for computer operators.

- Professional Development / Elective: All employees, with supervisory approval, may select one elective course of their choosing from the DCAS Course Catalog.
- Diversity & Inclusion / Everybody Matters: EEO and Diversity & Inclusion Training: This city-mandated training ensures that every employee knows and understands their Equal Employment Opportunity rights, including the City's EEO policy, who is protected, what constitutes discrimination and who is entitled to an accommodation.

In the first year the OOC will also reach out to outside vendors to offer employees in person and virtual disability etiquette training, first aid training, and fire safety training.

## Grievance Process Under the American with Disabilities Act (ADA)

The Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the OOC.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, are available upon request by persons with disabilities.

The complaint should be submitted by the grievant and/or their designee as soon as possible, but no later than 60 calendar days after the alleged violation to: Diane Jones Randall, ADA Coordinator, via email at [drandal@comptroller.nyc.gov](mailto:drandal@comptroller.nyc.gov) or via mail at 1 Centre Street, Room 639, New York, NY 10007.

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or their designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator or their designee will respond in writing and, where appropriate, in a format accessible to the complainant, such as large print or audio. The response will explain the position of the OOC and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or their designee does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to Executive Deputy Comptroller Sandra Abeles at [sabeles@comptroller.nyc.gov](mailto:sabeles@comptroller.nyc.gov).

All written complaints received by the ADA Coordinator or their designee and appeals to the Executive Deputy Comptroller or their designee, and responses will be retained by the OOC for at least three years.

## Digital Accessibility

The ADA prohibits discrimination based on disability. As such, all citizens are guaranteed equal access to government programs, activities, and services. As government agencies increasingly make services more accessible online, the ADA requires that people with disabilities are granted equal access to the same programs, activities, and services.

In 2016, New York City passed Local Law 26,<sup>2</sup> adding § 23-802 to the Administrative Code, in relation to a protocol<sup>3</sup> relating to the accessibility of city government websites for persons with disabilities. The law required the adoption of a standard for the accessibility of City websites for persons with disabilities, to be based either on federal regulations<sup>4</sup> or the Web Content Accessibility Guidelines (WCAG).<sup>5</sup> In 2017, the City of New York adopted the WCAG 2.0 Level AA guidelines as the minimum standard.

---

*§ 23-802. Accessibility.*

*a. The mayor or the mayor's designee shall adopt a protocol for websites maintained by or on behalf of the city or a city agency relating to website accessibility for persons with disabilities. Such protocol shall provide for agency websites to use either of the following standards: **section 1194.22 of title 36 of the code of federal regulations or the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA**, developed by the Worldwide Web Consortium, or any successor standards, provided that the adopted protocol may differ from these standards in specific instances when the mayor or mayor's designee determines, after consulting with experts in website design and reasonable accommodations for people with disabilities, and the holding of a*

---

<sup>2</sup> [https://www1.nyc.gov/assets/mopd/downloads/pdf/local\\_law\\_26.pdf](https://www1.nyc.gov/assets/mopd/downloads/pdf/local_law_26.pdf)

<sup>3</sup> <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=2230878&GUID=615EF0F8-14DE-46A0-B288-5A22CODA2B64>

<sup>4</sup> Section 508 of the Rehabilitation Act of 1973, codified at 36 CFR 1194.22; <https://www.section508.gov/manage/laws-and-policies>

<sup>5</sup> <https://www.w3.org/TR/WCAG20/>

*public hearing, that such differences will provide effective communication for people with disabilities, and that such differences are documented in such protocol. Such protocol shall be made available online. This section does not require an agency to take any action that would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.*

*b. No later than July 1, 2017, and every two years thereafter, the mayor or the mayor's designee shall submit to the council a written report that documents the compliance of websites maintained by or on behalf of the city or a city agency with the protocol adopted pursuant to subdivision a of this section.*

---

## Web Accessibility Statement

The OOC is committed to increasing accessibility for all New Yorkers, including visitors to our website. Our ongoing accessibility efforts aim to make information about the operations and services of the OOC and the City of New York accessible to all users of [comptroller.nyc.gov](https://comptroller.nyc.gov), including those with visual, sensory, cognitive, and mobility disabilities.

OOC's Web Accessibility Statement is available at <https://comptroller.nyc.gov/accessibility>.

## Feedback Form

The OOC is always looking to improve the accessibility of its website, and public input is greatly appreciated. Website visitors may contact the office via the Accessibility Feedback Form at <https://comptroller.nyc.gov/accessibility>.

## Website Audits

The OOC's website is regularly updated and tested for accessibility compliance with the goal of conforming with the specifications set forth by the Web Content Accessibility Guidelines (WCAG) to the best of the OOC's ability. The OOC conducted a web accessibility audit in October 2023 finding that web templates were on average 97% web accessible in accordance with WCAG 2.1 AA standards. The areas in need of improvement discovered during the October 2023 website audit will be addressed in 2024 with native web coding solutions. The OOC will continue to conduct annual internal website audits as well as external website audits conducted by a third party every three years. The OOC intends to maintain an average web compliance score of 90% or greater.

In 2024, the office will also conduct website audits on external related websites and web resources. And additional OOC employees will be trained to perform web accessibility audits.

## Best Practices

Quality checks are regularly conducted for accessibility standards before publishing web content. Additional steps will be taken in 2024 to improve ways in which the office communicates information and services online.

- **Social Media:** In 2023, efforts were made to improve accessibility for information shared by the office on social media platforms. These efforts include the regular use of Alt tags, text descriptions, video captions, and color ratio checks.
- **Visual Communication:** In 2023, the OOC appointed a DSF and Digital Inclusion Officer who will meet with internal stakeholders to explore solutions to improve the accessibility of data visualization tools, such as dashboards and spatial data storytelling. Data visualization solutions will be implemented in 2024 alongside improvements to existing web templates.
- **PDFs:** In 2023 the office identified web content that was available only in PDF format and converted such content to HTML for improved readability by assistive technology software. These efforts will continue in 2024, including improvements to the office's online services.
- **Staff Training:** In 2024, staff will be trained on web accessibility best practices; to include the sharing of social media content, posting content to the OOC's website, video production and captioning, graphic design, the creation of accessible PDF documents, document formatting, and more.

## WCAG Guidelines

The [WCAG guidelines](#) were developed by the World Wide Web Consortium (W3C). It defines how to make the web more accessible to people with disabilities and is based on four principles of accessibility, as outlined below.

To comply with WCAG 2.1 Level AA a website must be:

1. **Perceivable** - Information and user interface components must be presentable to users in ways they can perceive.
  - 1.1 Text Alternatives
  - 1.1.1 Non-text Content

- 1.2 Time-based Media
    - 1.2.1 Audio-only and Video-only (Prerecorded)
    - 1.2.2 Captions (Prerecorded)
    - 1.2.3 Audio Description or Media Alternative (Prerecorded)
    - 1.2.4 Captions (Live)
    - 1.2.5 Audio Description (Prerecorded)
    - 1.2.6 Sign Language (Prerecorded)
    - 1.2.7 Extended Audio Description (Prerecorded)
    - 1.2.8 Media Alternative (Prerecorded)
    - 1.2.9 Audio-only (Live)
  - 1.3 Adaptable
    - 1.3.1 Info and Relationships
    - 1.3.2 Meaningful Sequence
    - 1.3.3 Sensory Characteristics
    - 1.3.4 Orientation
    - 1.3.5 Identify Input Purpose
    - 1.3.6 Identify Purpose
  - 1.4 Distinguishable
    - 1.4.1 Use of Color
    - 1.4.2 Audio Control
    - 1.4.3 Contrast (Minimum)
    - 1.4.4 Resize Text
    - 1.4.5 Images of Text
    - 1.4.6 Contrast (Enhanced)
    - 1.4.7 Low or No Background Audio
    - 1.4.8 Visual Presentation
    - 1.4.9 Images of Text (No Exception)
    - 1.4.10 Reflow
    - 1.4.11 Non-text Contrast
    - 1.4.12 Text Spacing
    - 1.4.13 Content on Hover or Focus
2. **Operable** - User interface components and navigation must be operable.
- 2.1 Keyboard Accessible
    - 2.1.1 Keyboard
    - 2.1.2 No Keyboard Trap
    - 2.1.3 Keyboard (No Exception)
    - 2.1.4 Character Key Shortcuts

- 2.2 Enough Time
    - 2.2.1 Timing Adjustable
    - 2.2.2 Pause, Stop, Hide
    - 2.2.3 No Timing
    - 2.2.4 Interruptions
    - 2.2.5 Re-authenticating
    - 2.2.6 Timeouts
  - 2.3 Seizures and Physical Reactions
    - 2.3.1 Three Flashes or Below Threshold
    - 2.3.2 Three Flashes
    - 2.3.3 Animation from Interactions
  - 2.4 Navigable
    - 2.4.1 Bypass Blocks
    - 2.4.2 Page Titled
    - 2.4.3 Focus Order
    - 2.4.4 Link Purpose (In Context)
    - 2.4.5 Multiple Ways
    - 2.4.6 Headings and Labels
    - 2.4.7 Focus Visible
    - 2.4.8 Location
    - 2.4.9 Link Purpose (Link Only)
    - 2.4.10 Section Headings
  - 2.5 Input Modalities
    - 2.5.1 Pointer Gestures
    - 2.5.2 Pointer Cancellation
    - 2.5.3 Label in Name
    - 2.5.6 Motion Actuation
    - 2.5.5 Target Size (Enhanced)
    - 2.5.6 Concurrent Input Mechanisms
3. **Understandable** - Information and the operation of user interface must be understandable.
- 3.1 Readable
    - 3.1.1 Language of Page
    - 3.1.2 Language of Parts
    - 3.1.3 Unusual Words
    - 3.1.4 Abbreviations
    - 3.1.5 Reading Level



- 3.1.6 Pronunciation
  - 3.2 Predictable
  - 3.2.1 On Focus
  - 3.2.2 On Input
  - 3.2.3 Consistent Navigation
  - 3.2.4 Consistent Identification
  - 3.2.5 Change on Request
  - 3.3 Input Assistance
  - 3.3.1 Error Identification
  - 3.3.2 Labels or Instructions
  - 3.3.3 Error Suggestion
  - 3.3.4 Error Prevention (Legal, Financial, Data)
  - 3.3.5 Help
  - 3.3.6 Error Prevention (All)
4. **Robust** - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
- 4.1 Compatible
    - 4.1.1 Parsing (Obsolete and removed)
    - 4.1.2 Name, Role, Value
    - 4.1.3 Status Messages

## Methodology

The OOC Accessibility Plan Working Group comprises of employees from across the agency, including the Bureau of Public Affairs, Bureau of Administration, Office of the General Counsel, Office of the EEO, Diversity and Inclusion, and Communications Department who met to identify and address accessibility issues at the OOC. As project lead, the DSF coordinated across these various departments to set timelines and milestones with guidance and feedback from the Mayor’s Office of People with Disabilities. The OOC also hosted a Disability Justice Roundtable on February 15, 2024 to receive input on our draft Five-Year Accessibility Plan. The DSF followed up with stakeholders who were unable to attend the roundtable to receive their input on the accessibility plan. The OOC received one comment on the plan that is available on [the Mayor’s Office’s section of the City’s Agency Plans’ website](#). The OOC reviewed and considered all feedback given and has addressed most of the comments and input in the final plan.





NEW YORK CITY COMPTROLLER  
**BRAD LANDER**

---

1 Centre Street, New York, NY 10007

[www.comptroller.nyc.gov](http://www.comptroller.nyc.gov)

 @NYCComptroller

(212) 669-3916