New York City Employees' Retirement System
Local Law 12 of 2023
Five-Year Accessibility Plan
(2024-2028)

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Mission and Background of NYCERS

The prime function of the New York City Employees' Retirement System (NYCERS) is to administer the statutory pension benefits of its clients, retirees and beneficiaries. NYCERS' talented, professional and dedicated employees are committed to providing superior service by:

- Making correct benefit payments in a timely manner
- Leveraging modern technology to set new standards of excellence in the services NYCERS provides
- Maximizing investment returns on the funds of the system with an appropriate level of risk.

NYCERS' members and retirees may create their own personalized MyNYCERS accounts at www.mynycers.org, where they can access most services and complete transactions online.

NYCERS operates a Walk-in Center located at 340 Jay Street, Brooklyn, NY 11201 where members, retirees and beneficiaries can submit various applications and documents in person. The Walk-In Center is open Monday through Friday 8 a.m. to 5 p.m.

NYCERS also operates a Call Center at (347) 643-3000, where clients can speak with a representative. NYCERS' mailing address is 30-30 47th Avenue, 10th Floor, Long Island City, NY, 11101, where clients can mail documents to complete transactions and communicate with NYCERS via written correspondence.

Statement of Commitment

NYCERS is committed to ensuring its 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. NYCERS' Compliance Division will be responsible for ensuring that the agency's five-year accessibility plan is completed on time. Questions regarding the five-year accessibility plan can be sent to: ComplianceDivision@nycers.org.

Executive Summary

NYCERS is committed to equity both in its workforce and in the provision of services to members, retirees and beneficiaries. To comply with the Americans with Disabilities Act (ADA) and Local Law 12 of 2023, NYCERS designed this Accessibility Plan to identify priority areas to remove barriers to accessing services and to empower its workforce to better serve our clients. It is NYCERS' policy to comply 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. NYCERS does not discriminate on the basis of disability in the provision of benefits and services, and strives to be welcoming to and inclusive of people with disabilities. This Plan addresses access in the following areas: (1) Physical Access; (2) Digital Access; (3) Communications; and (4) Workplace Inclusion.

The purpose of this proposed plan is to outline how NYCERS will identify, remove, and prevent barriers for people with disabilities and comply with the ADA and other legal requirements.

Contact Information

NYCERS Disability Service Facilitator (DSF)

Email address: Accessibility@nycers.org
335 Adams Street, Suite 2300
Brooklyn, NY 11201

Online Resources

NYCERS' website contains useful information for people with disabilities, including:

- [Non-discrimination Policy and Notice of Rights](#)
- [Grievance Procedure](#)
- [Website Accessibility Feedback Form](#)
- [Website Accessibility Statement](#)

To access NYCERS' online accessibility resources, please visit
https://www.nycers.org/website-accessibility (Appendix B)

Agency Plan

Physical Access (Implementation Timeframe: 2024)

NYCERS is committed to providing safe and accessible facilities for the clients we serve and our dedicated staff. We will continue to make progress in our compliance with accessibility standards.

NYCERS has three locations – one in Long Island City, Queens and two in Downtown Brooklyn. Our Long Island City and Adams Street locations are open to NYCERS employees only. Our 340 Jay Street location in Brooklyn is open to NYCERS members, retirees and beneficiaries, Monday through Friday 8 a.m. to 5 p.m.

NYCERS' Facilities Division conducted a physical access evaluation at our Long Island City location and both Brooklyn locations using applicable sections of the "ADA Checklist for Existing Facilities."

Identified Action to be Taken - at our 335 Adams Street and 345 Jay Street locations:

- o We do not have tactile signage in various locations with raised lettering indicating handicap accessibility. The agency will purchase signs for these areas and place them where necessary.

NYCERS will continue to evaluate our physical accessibility based on requests from clients and employees.

Digital Access (Implementation Timeframe: 2024-2028)
NYCERS' website:

In July 2023, an external vendor conducted an ADA compliance audit for NYCERS website, www.nycers.org, covering the entire website, including webpages, content and functionality. It evaluated compliance with the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA, recognized as the current standard for web accessibility.

The audit identified the following on the nycers.org website:
- o Insufficient color contrast between text and background elements, affecting readers with low vision.
- o Use of a tab index value greater than 0, which disrupts the natural tab order, making the page less intuitive and causing elements to appear skipped.

Lack of language attribute where, if a page is not in a default language, a screen reader may not correctly announce the page's text correctly.

Actions to be Taken

NYCERS worked with the vendor to implement the following measures to resolve the issues with the NYCERS website:

- o Color contrast adjustments – The elements with insufficient color contrast were modified to comply with WCAG 2.1, Level AA standards.
- o Heading structure consistency – The heading structure on all pages was reviewed and adjusted to ensure consistency and improve content comprehension.
- o Document language declaration – All pages on the NYCERS website now include a language declaration, allowing screen readers to accurately interpret the content.

NYCERS' Communications Division will continue to assess the need for further third-party audits to ensure conformity with current WCAG standards and guidelines.

MyNYCERS website:

In 2023, an outside vendor conducted an ADA compliance audit for the MyNYCERS website, where members and pensioners can view account information and submit applications, forms and other documents. This audit identified digital accessibility issues with NYCERS' applications and transactions conducted within MyNYCERS. The digital accessibility findings have been categorized into four levels, based on impact on users with disabilities. These impacts were classified as critical, serious, moderate, and minor for people with disabilities.

Action to be Taken
NYCERS' will evaluate and prioritize the findings, starting with remediating the most critical and serious impacts on users with disabilities and develop a feasible timeline.

NYCERS' Video Content:
NYCERS maintains a YouTube page available to the public that can also be found on NYCERS' website. NYCERS' YouTube videos include auto-generated Closed Captioning; however, they do not include original audio descriptions.

Action to be Taken
NYCERS will evaluate if there is a need to include this feature in our YouTube videos based on requests from NYCERS' clients and employees.

Policies and Training on Digital Access (Implementation Timeframe: 2023-2024)

Training on Creating Accessible Digital Content
NYCERS' Communications Division is familiar with and follows the Mayor's Office for People with Disabilities Accessible Documents Guide, Accessible PPT Guide and

Accessible PDF Guide. However, NYCERS does not have specific policies in place related to the creation of accessible digital content; specific training for content creators on what makes digital content accessible, or a specific review process to ensure accessibility of documents or forms.

Action Taken on Policies and Training on Digital Access
The Communications Division now has access to the MOPD online resources and training materials on Digital Content.

Mass or Automated Emails

NYCERS does not use a mass email solution.

Action to be Taken
We will evaluate the use of Marketing Cloud to communicate with NYCERS' clients and research if the platform will include specific accessibility features for automated emails.

NYCERS' Learning Modules (Implementation Timeframe: 2024-2028)

NYCERS' training materials/learning modules have not undergone testing by people with disabilities to determine whether users are able to navigate through trainings using preferred assistive technology.

Action to be Taken
NYCERS' will evaluate whether users with different disabilities are able to navigate internal training materials/learning modules using preferred assistive technology.

NYCERS' Internal Applications and Tools (Implementation Timeframe: 2024-2028)

Our focus has been on ensuring our public-facing applications and tools are in compliance with accessibility standards. We currently do not have employees who have self-identified as blind/low vision, deaf, and/or have physical disabilities that limit their ability to use our internal applications and tools.

Action to be Taken
NYCERS will continue to evaluate our internal applications and tools for compliance with the W3C's Web Content Accessibility Guidelines 2.1 Level AA.

Effective Communications (Implementation Timeframe: 2024-2028)

NYCERS maintains policies and procedures in place to address requests from its employees, contractors and clients for reasonable accommodations and/or auxiliary aids and services.

The contact information for the Disability Service Facilitator is on our website, in the employee handbook, and shared with all employees and contractors via agency wide email.

NYCERS' clients, including members, retirees and beneficiaries with disabilities and their accompanying guests (if need) may request auxiliary aids and services such as ASL interpreters, assistive listening devices and wheelchair accessibility.

Actions Taken
The contact info for our ADA Coordinator and Disability Service Facilitator is available in our five-year plan on our website.

Our Employee Handbook has been updated with our ADA Coordinator and Disability Service Facilitator contact information by our Human Resources division.

Specific Auxiliary Aids and Services (Implementation Timeframe: 2024-2028)

During self-evaluation, NYCERS identified the following auxiliary aids and services which are not currently available:

Video Remote Interpretation (VRI)

Action to be Taken
When VRI is requested, NYCERS will contact our interpreter vendor to provide VRI upon request.

Communication Access Real Time Transcription (CART)

Action to be Taken
We will continue to evaluate the effectiveness of Zoom and Microsoft Teams' live captioning services for our communications with NYCERS employees and clients.

Documents in Braille
NYCERS' digital content on nycers.org and my.nycers.org are compatible with screen readers. The user can utilize screen readers on their device.

<u>Documents in Large Print</u>

<u>Action to be Taken</u>
NYCERS will print the document in large font using Adobe Acrobat's accessibility features upon request.

Workplace Inclusion (Implementation Timeframe: 2024-2028)

NYCERS has made Strategic Workforce Development a priority in our Vision 2027 plan as well as through the Legacy Replacement Project. This includes developing career pathways for various roles, as well as training/learning paths for various roles. To ensure all employees are given the opportunity to advance and realize their potential, NYCERS has made development conversations and plans a requirement of our evaluation process.

<u>Employee Training</u>
The Disability Etiquette and Awareness Training offered by DCAS is not currently mandatory for all NYCERS employees.

<u>Action to be Taken</u>
NYCERS will make the Disability Etiquette and Awareness Training mandatory for all its employees on a cyclical basis.

<u>Employee Recruitment</u>

<u>Actions to be Taken</u>
- EEO officers review job postings in an effort to ensure access to equal opportunities for people with disabilities by ensuring that any barriers are removed.

- Continue to share postings with the Mayor's Office for People with Disabilities, which are accessible by State Vocational Rehabilitation agencies and other organizations that work with people with disabilities.

<u>Employee Resource Groups</u>
NYCERS does not have employees who have self-identified as having particular disabilities and does not currently have an affinity group for employees with disabilities. However, NYCERS has a Diversity, Equity, Inclusion and Belonging (DEIB) Committee that makes recommendations for Action Plans for improving DEIB at NYCERS.

<u>Action to be Taken</u>
NYCERS will continue to evaluate.

Employee Retention

NYCERS recognizes the need to create clear career pathways for employees, including employees with disabilities.

Action to be Taken

See Strategic Workforce Development (top of page). Additionally, NYCERS' Career Counselor provides counseling to all employees who request guidance on the Civil Service process and opportunities for advancement.

Change Management

NYCERS has not specifically addressed accessibility in our change management process.

Action to be Taken

NYCERS Organizational Change Management team will add accessibility to their organizational change checklist processes and evaluate the impact to employees with disabilities.

Methodology

NYCERS is committed to meeting ADA compliance requirements by removing and preventing accessibility barriers as well as helping its clients and employees with disabilities navigate NYCERS' external and internal websites, nycers.org and mynycers.org to get the information and services they need.

Clients are encouraged to email Accessibility@nycers.org to report any website accessibility issues they may encounter while using either website. Depending on the accessibility issue they experience, the request is forwarded to either NYCERS' Information Technology or Communications division to investigate and follow up with the client. NYCERS employees are encouraged to contact the ADA Coordinator or Disability Services Facilitator to request any accommodations, if necessary, to improve their performance and experience at work.

NYCERS consulted with its EEO Office to identify the access issues described in this proposed plan. The EEO Office, through the reasonable accommodations process, interacts with individuals with disabilities and has both a historical and a present understanding of disability-related inquiries and needs. NYCERS looks forward to public comment concerning this proposed plan and will work to achieve its goals by recognizing and addressing concerns from members of the public.

Glossary

Alt text (alternative text)
Describes an image on a page. Alt text helps visually impaired people understand what the image shows, helps search engine bots understand image contents, and appears on a page when the image fails to load.

Audio Description
An additional audio track, in addition to the dialog and background music or effects that describes the significant visual aspects of the video. Depending on the video player/streaming platform, this audio track can either be turned on and off by the user (Hulu and Netflix) or is embedded in the video itself (YouTube). For platforms that do not support audio description tracks, an audio described version must be produced either as the default video, or as an additional version.

Captions, Closed
Captions generated through a text file, usually .SRT, which video players use to display captions when that feature is turned on by the user. The file contains the text to be displayed along with time codes to indicate when and for how long the captions should be displayed. This type of caption is the most accessible because it provides the user with the greatest level of access and customization since it is actual text.

Captions, Open (Embedded)
Captions added to a video during its production. These captions are always on and cannot be turned off. These captions are less accessible because they are essentially an image of text, which means the user cannot customize their display or get access to the text with their access technology.

Communication Access Real-time Transcription
Also known as "real-time captioning" or "CART", a caption writer (sometimes trained as a court reporter or stenographer) uses a stenotype machine with a phonetic keyboard and special software. A computer translates the phonetic symbols into English captions almost instantaneously. Depending on the skill of the caption writer, it is generally superior to auto-generated captions.

Tactile Sign
Tactile signage is read (or more-easily read) by physically touching a sign's letters or symbols. They are primarily provided for individuals who have suffered from visual impairment or vision loss later in life and would recognize alphabetical letters upon touching them.

Video Remote Interpretation

Video remote interpreting (VRI) uses video conferencing technology to access an off-site interpreter to provide real-time sign language or oral interpreting services for conversations between hearing people and people who are deaf or have hearing loss. Federal regulations allow covered entities to use VRI or on-site interpreters in situations where either would be effective. However, VRI will not be effective in all circumstances. For example, it will not be effective if the person who needs the interpreter has difficulty seeing the screen. In these circumstances, an on-site interpreter may be required.

If VRI is chosen, all the following specific performance standards must be met: real-time, full-motion video and audio over a dedicated high-speed, wide-bandwidth video connection or wireless connection that delivers high-quality video images that do not produce lags, choppy, blurry, or grainy images, or irregular pauses in communication; a sharply delineated image that is large enough to display the interpreter's face, arms, hands, and fingers, and the face, arms, hands, and fingers of the person using sign language, regardless of his or her body position; a clear, audible transmission of voices; and adequate staff training to ensure quick set-up and proper operation.

Web Content Accessibility Guidelines

The World Wide Web Consortium (W3C) has created the Web Content Accessibility Guidelines. The current version is 2.1 and, at Level AA (the level most organizations strive for), contains 52 Success Criteria used to measure accessibility compliance. Meeting the AA level means your site complies with all the A and AA criteria, as they build on each other.