



OFFICE OF THE DISTRICT ATTORNEY
RICHMOND COUNTY

MICHAEL E. MCMAHON
DISTRICT ATTORNEY

Office of the Richmond County District Attorney
Proposed 5-Year Accessibility Plan, 2024-2028

A. Background

All New York City agencies are required to develop and implement a 5-year accessibility plan, pursuant to Local Law 12 of 2023 (“Local Law 12”),¹ and in consultation with the Mayor’s Office for People with Disabilities (“MOPD”). According to Local Law 12, the accessibility plan must set forth the steps an agency is taking to “ensure that the agency’s workplace, services, programs, and activities are accessible to and accommodating and inclusive of persons with disabilities” by “improving physical, digital, and programmatic access, and effective communications for persons with disabilities.” Such improvements include, but are not limited to: any alterations or structural changes to facilities or premises that are owned and operated by the agency or contracted for use by the agency or otherwise under the agency’s jurisdiction; any planned upgrades or investments in technology or tools that will improve accessibility within the agency or access to such agency’s services and programs; and any other steps the agency is taking or plans to take to make its programs and services more accessible to and inclusive of persons with disabilities.

¹ Local Law 12 of 2023, available at <https://intro.nyc/local-laws/2023-12>.

B. Statement of Commitment

The Office of the Richmond County District Attorney (“RCDA”) is committed to an environment in which equitable, diverse, and inclusive practices are promoted and encouraged. RCDA understands the importance of providing persons with disabilities with access to the office’s services; to identifying, preventing, and removing barriers to accessibility; and to complying with accessibility requirements in a way that respects the dignity and independence of persons with disabilities.

Consistent with the purpose of Local Law 12, RCDA endeavors to use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Receipt of complaints, investigations and other services are provided in a manner that respects the dignity and independence of persons with disabilities to enable them to obtain, use, or benefit from RCDA’s resources and/or services;
- Persons with disabilities are given an opportunity equal to that given to others to obtain, use, and benefit from RCDA’s resources and/or services;
- When communicating with a person with a disability, RCDA will do so in a manner that considers the person’s disability and preferred method of communication;
- Planned installation of assistive listening devices so that persons with disabilities may use assistive devices to support access to RCDA’s resources and services; and
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.

C. Agency Mission

The employees of the Richmond County District Attorney’s Office work each day in partnership with law enforcement and the people of Staten Island to pursue justice for victims of crime, to prevent crime in all its forms, and to promote the safety and well-being of all citizens of Staten Island.

RCDA has three locations, two of which are satellite offices. RCDA’s main office is located at 130 Stuyvesant Place in Staten Island, where the agency utilizes floors six

through nine, as well as the third floor where the Grand Jury sits. The second satellite office is in the basement of the Staten Island Criminal Courthouse, located at 26 Central Avenue. The third satellite office is located within the Family Justice Center (“FJC”), located at 126 Stuyvesant Place, with a secondary entrance only for RCDA employees via the lobby of 130 Stuyvesant Place.

RCDA has multiple bureaus and units, including, but not limited to the following: Trials Bureau; Criminal Court Bureau; Appeals Bureau; Domestic Violence Bureau; Narcotics and Investigations Bureau; Special Victim’s Bureau; Economic Crimes Bureau; Administration Bureau; Alternatives to Incarceration Unit; Animal Cruelty Prosecution Unit; Firearm Anti-Violence Unit; Elder Abuse Unit; Juvenile Justice Unit; Public Corruption Unit; Cybercrimes Unit; Strategic Projects and Initiatives Unit; Community Partnership Unit; and Immigrant Affairs Unit.

RCDA has approximately 230-240 employees. The majority of RCDA’s employees hold the following positions: Assistant District Attorneys (“ADAs”); Paralegals; Discovery Specialists; Victim Advocates; Peer Recovery Counselors; Grand Jury Stenographers; Criminal Court and DAT Assistants; Grand Jury Stenographers; Detective Investigators; Crime and Tech Analysts; Community Liaisons; Information Technology Specialists; and Body Worn Camera Analysts.

Interaction with employees and the public occurs at all three RCDA locations. For example, victim advocates, who are stationed at all three locations, converse with members of the public, such as victims of crime and their families, via telephone, email, and in-person. In addition, Assistant District Attorneys, who are also stationed at all three locations, meet with or have interactions with members of the public, including, but not limited to, victims of crime and their families, witnesses, criminal defense attorneys, and jurors who sit on the grand jury. Further, paralegals and victim advocates have interactions with the public mostly via telephone and email with witnesses, victims of crime, and criminal defense attorneys.

D. Contact Information

RCDA’s Strategic Projects & Initiatives Unit is responsible for preparing and updating RCDA’s 5-Year Accessibility Plan.

Online Resources

RCDA’s website contains valuable information for persons with disabilities, which includes the following:

1. Non-discrimination Policy and Notice of Rights
2. Grievance Procedures
3. Website Accessibility Statement
4. Language Access Statement
5. Five-Year Accessibility Plan

To access RCDA’s online accessibility resources, please visit:

<https://www.statenislandda.org/accessibility/>.

Accommodation Requests

Under Local Law 27 of 2016, every City agency is 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 Americans with Disabilities Act (“ADA”) and other federal, state, and local laws and regulations concerning access to agency programs and services by persons with disabilities. These individuals are liaisons to New Yorkers with disabilities, connecting people with disabilities to City government. Employees and/or members of the public who need assistance accessing a particular program or service, should contact RCDA’s DSF Andrew Sterrer at (718) 524-0567 or disabilityservices@rcda.nyc.gov.

Availability

RCDA’s accessibility plan is publicly posted online at:

<https://www.statenislandda.org/accessibility/>.

Individuals may request a copy of this document in an accessible alternative format by contacting the DSF at disabilityservices@rcda.nyc.gov or (718) 524-0567.

E. Executive Summary

The Richmond County District Attorney's Office (“RCDA”) is committed to fostering a barrier-free environment where individuals of all abilities can participate fully. RCDA’s 5-year accessibility plan outlines a comprehensive strategy to address physical, digital, programmatic, and communication accessibility challenges.

Key actions include installing assistive listening devices and braille signage, improving website accessibility, providing accessible formats and communication support, and offering disability awareness training to all employees. RCDA will also partner with local community-based organizations that have expertise with the disability community to identify and address accessibility gaps in our programs and services.

By implementing these measures and continuously monitoring progress, RCDA aims to create a truly inclusive environment that welcomes and empowers individuals with diverse abilities. This commitment ensures equal access to justice for all within the Staten Island community.

F. Actions RCDA has Taken to Improve Access

1. Effective Communications

RCDA has put in place mechanisms for providing the following:

1. In-person sign language;
2. Website accessibility tools and plug-in;
3. Video remote interpretation; and
4. Providing documents in large print.

2. Workplace Inclusion

Hiring and Recruitment

RCDA has taken the following steps to help ensure that potential applicants with disabilities are given the same opportunity as those without a disability by:

1. Hiring and promoting people with disabilities at all levels, not just entry-levels;
2. Having a 55-a Program Coordinator on staff who uses the 55-a Program to hire people with disabilities for competitive positions;
3. Participating in disability recruitment events;
4. Reviewing all job descriptions to ensure that they are disability-inclusive;
5. Posting electronic job announcements that are accessible to those who use access technologies;

6. Providing documents and forms to applicants as part of the pre-employment process that are accessible to those who use access technology; or hard copies that are available in alternative formats; and
7. Providing different options for where interviews can be held, such as in-person or virtual.

Performance Management, Career Development and Redeployment

RCDA is committed to ensuring that accessibility needs of employees with disabilities are considered with respect to performance management and career development. In this regard, RCDA does the following:

1. Provides coaching opportunities and clear pathways to help ensure that all employees, including those with disabilities, have the information to be successful and the opportunity to advance;
2. Encourages 55-a employees to take promotional exams;
3. Provides trainings and professional development opportunities that are accessible to all employees, including employees with disabilities; and
4. Ensures that all employees have completed the Disability Etiquette & Awareness training on Citynet.

Reasonable Accommodations and Documented Individual Accommodation Plans

Consistent with the Citywide EEO Policy and relevant laws and rules, RCDA's EEO Office produces and provides documented individual accommodations based on the following practices:

1. Cooperative dialogue with the employee or applicant requesting and/or requiring the accommodation;
2. External medical evaluations to determine appropriate and effective accommodations that address the specific disability or condition;
3. High level of privacy;
4. Regular review and updates, where applicable;
5. Reasons for denial, if applicable;
6. The means of providing the accommodation in a format that considers the needs of the employee;
7. If required, include individualized workplace emergency response information; and

8. RCDA also provides tools, technology, and workspaces that are accessible to all employees, such as ergonomic office equipment and the availability of access technology.

In addition, RCDA's employee reasonable accommodation process follows the DCAS Reasonable Accommodation Procedural guidelines.

Accessible Emergency Information

RCDA has a process for documenting challenges with accessibility in addition to recording and providing accommodations for individualized accessible emergency response information. RCDA ensures that building management at each of RCDA's three locations have a fire and emergency management plan in place that accounts for employees and visitors with disabilities, including communication disabilities. RCDA staff have also been trained in what to do in the event of a fire or other emergency with respect to staff and others with disabilities and functional needs.

RCDA will continue to review individualized workplace emergency response plans to make sure they are updated and accurate.

G. Agency Plan

1. Physical Access

(Implementation Timeframe: 2024-2028)

RCDA operates out of the following buildings:

City-owned buildings:

1. Main Office: 130 Stuyvesant Place, Staten Island, NY 10301.
2. Staten Island Family Justice Center (satellite office), 126 Stuyvesant Place, Staten Island, NY 10301.
3. Richmond County Criminal Courthouse (satellite office), 26 Central Avenue, basement, Staten Island, NY 10301.

Note: DCAS is responsible for common areas in the City-owned buildings listed above. RCDA is responsible for the demised areas (i.e., the offices themselves).

RCDA intends on making several access improvements within its office space, including:

1. Assistive Listening Devices.
 - RCDA plans to install assistive listening devices in one conference room at 130 Stuyvesant Place, as well as in two interview rooms – one at 26 Central Avenue and one at 126 Stuyvesant Place.
2. Braille Signage.
 - RCDA plans on installing braille signage in numbered offices and in all demised areas where there is directional signage.

In addition to the above, RCDA will continue to create plans to make its facilities more accessible. RCDA will take appropriate steps to prevent service disruptions to accessible parts of its public spaces. In the event of a service disruption, we will notify the public of the service disruptions and alternatives available.

2. Digital Access

(Implementation Timeframe: 2024-2028)

- RCDA will continue to do our utmost to meet Web Content Accessibility Guidelines 2.1 Level AA for both our internal and public facing websites. RCDA’s Web Accessibility Statement is posted online at (<https://www.statenislandda.org/accessibility/>) in compliance with Local Law 12.
- In addition, to attain greater digital accessibility and remove barriers for people with disabilities, RCDA plans on the following:
 1. Providing or arranging, upon request, for the provision of accessible formats and communication supports to people with disabilities in a timely manner, taking into account the person’s accessibility needs.
 2. Providing, upon request, accessible formats and communication supports for receiving and responding to feedback from persons with disabilities.
 3. Organizing professional training sessions, including those offered by the Department of Citywide Administrative Services (“DCAS”).

3. Programmatic Access

(Implementation Timeframe: 2024-2028)

Although our Program Accessibility Self-Evaluation is not yet complete, inclusion and accessibility are core values for RCDA. To receive the best information from our Program Accessibility Self-Evaluation, RCDA plans on partnering with a local community-based organization, Person Centered Care Services, who has expertise with populations with disabilities, and holding focus groups, to develop recommendations and suggestions regarding gaps in accessibility identified in the evaluation.

RCDA is also committed to providing training on the requirements of accessibility as they apply to people with disabilities. As such, RCDA plans on having accessibility training for all employees in 2024.

RCDA has taken or intends to take the following measures to ensure our workforce is provided with the training necessary to comply with current standards and laws:

1. Provide educational or training resources in an accessible format that considers the accessibility needs of people with disabilities.
2. Have new employees and volunteers complete Disability Etiquette and Awareness training within 30 days of employment or placement.
3. Keep and maintain a database of the training participant's names and dates of completion.

4. Effective Communications

(Implementation Timeframe: 2024-2028)

Even though RCDA does not have customers in the same way as many other agencies, we do have victims, family members of victims, and visitors to our offices. RCDA is committed to providing accessible services to people with disabilities and making our information and communications accessible to people with disabilities.

RCDA plans on taking the following measures to make our communications more accessible by:

1. Providing Communication Access Realtime Transcription (CART).

2. Providing a mechanism for closed-captioning of videos.
3. Establishing a mechanism for providing documents in braille.
4. Establishing a mechanism for providing documents as audio recordings.

5. Workplace Inclusion

(Implementation Timeframe: 2024-2028)

Workplace Inclusion Plans

As RCDA is committed to ensuring an environment at work that is inclusive and supportive of people with disabilities, we intend on taking the following actions:

1. Posting positions on the NYC:ATWORK job boards.
2. Providing internship opportunities for people with disabilities through programs such as the Partnership for Inclusive Internships.
3. Establishing an affinity group/employee resource group (“ERG”) for people with disabilities.
4. Providing all employment/personnel notices in an accessible format.
5. Providing expanded periodic training for employees on the disability-related issues that affect RCDA.

Accessibility Policies and Plans

RCDA has developed and will implement and maintain a five-year accessibility plan that outlines the strategies and actions to identify, prevent, and remove barriers for people with disabilities. In this regard, RCDA will:

- Update its Employee Handbook that includes the Citywide EEO policy with policies and processes that stem from this five-year accessibility plan.

H. Methodology

1. Scope and Vision.

- **Goals:** This plan strives to achieve regulatory compliance (e.g., ADA Title III and Local Law 12) and genuine inclusivity. We aim to foster a barrier-free environment where individuals with diverse abilities can fully participate and thrive in all aspects of our organization.
- **Beneficiaries:** The plan encompasses people with physical, sensory, cognitive, and intellectual disabilities, including those with temporary or situational impairments. The focus extends beyond prominent categories to cater to individuals with less visible disabilities (e.g., chronic pain, ADHD).

2. Assessment and Needs Identification.

- **Accessibility Audit:** A comprehensive audit will be conducted by a team of accessibility specialists and members of the disability community, encompassing:
 - **Physical environment:** Review building layout, signage, furniture, walkways, restrooms, entrances, and exits, etc., for accessibility barriers.
 - **Technology:** Assessing websites, software, hardware, and digital tools for compliance with WCAG 2.1 guidelines and user testing with various assistive technologies.
 - **Communication:** Evaluating communication methods (written, verbal, digital) for clarity, conciseness, and alternative formats (e.g., braille, sign language).
 - **Policies and procedures:** Reviewing internal policies and procedures to identify discriminatory practices or unintended barriers to access.
- **Stakeholder Engagement:** We will actively engage with people with disabilities, disability advocacy groups, staff, and community members through:
 - **Focus groups and interviews:** Gathering firsthand experiences and suggestions for improvement.

- Surveys and online feedback forms: Reaching a wider audience and quantifying data on accessibility issues.
- Accessibility advisory committee: Establishing a committee with diverse representation to provide ongoing guidance and oversight.
- Prioritization: The collected data will be analyzed using a multi-criteria framework considering:
 - Severity of the barrier: Impact on independence and participation.
 - Frequency of occurrence: Number of individuals affected.
 - Feasibility of implementation: Resource requirements and ease of implementation.
 - Legal compliance: Addressing priority areas related to regulatory requirements.

3. Action Plan and Implementation.

- SMART Goals: Specific, measurable, achievable, relevant, and time-bound goals will be defined for each identified barrier, outlining the desired outcome and timeframe for action.
- Accessibility Strategies: Comprehensive strategies will be developed for different areas, including:
 - Physical Accessibility: Implementing accessible restrooms, adaptable furniture, inclusive signage, and emergency evacuation procedures.
 - Information Accessibility: Providing alternative document formats (e.g., audio descriptions, closed captions, braille), clear and concise writing style, and content management systems compatible with assistive technologies.
 - Communication Accessibility: Employing sign language interpreters, offering staff training on disability etiquette, and ensuring multi-modal communication options (e.g., email, phone, online forms).

- Technological Accessibility: Adhering to WCAG 2.1 guidelines, providing assistive technology options, and regularly testing software and platforms with diverse users.
- Resource Allocation: A dedicated budget will cover personnel, infrastructure changes, technology upgrades, and training programs. An accessibility champion will be designated to oversee resource allocation and implementation.

4. Monitoring and Evaluation.

- Evaluation Methods: Progress towards goals will be measured through regular audits, user surveys, feedback mechanisms, and data analysis of website accessibility metrics.
- Ongoing Engagement: Continuous engagement with the disability community and stakeholders will occur through progress reports, accessibility awareness campaigns, and open communication channels.
- Flexibility and Adaptation: The 5-Year Accessibility Plan will be a living document, subject to regular review and updates based on feedback, technological advancements, and changing needs.

This methodology will guide the development and implementation of a comprehensive and effective disability accessibility plan that strives to create a truly inclusive environment for all.

I. Implementation Timelines

Implementation timelines for this 5-Year Accessibility Plan are as follows:

- Accessibility Audit & Assessment: January - June 2024.
- Stakeholder Engagement/Prioritization: June 2024 - June 2025.
- Action Plan and Implementation: July 2024 - July 2026.
- Monitoring and Evaluation: 2025-2028 and beyond.
- Posting of final 5-Year Accessibility Plan on RCDA website: March 2024.
- Posting of 5-Year Accessibility Plan by MOPD on its website who submits it to New York City Council: March 2024.

- Annual progress reports: Due May 2025, and every year thereafter (must be posted on RCDA website and submitted to MOPD, who will submit to NYC Council).
- Triennial updates to 5-Year plan. Due May 2027, and every three years thereafter (must be posted on RCDA website and submitted to MOPD, who will submit to NYC Council).

Appendix A

RCDA Proposed Five-Year Accessibility Plan RCDA Accessibility Webpage

RCDA Policies Prohibiting Discrimination Against People with Disabilities in Access to Services

It is the policy of the Office of the Richmond County District Attorney (“RCDA”) 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. RCDA 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.

Employment related complaints for employees and applicants for employment seeking a reasonable accommodation are covered under the City’s EEO Policy which can be found at nyc.gov/assets/dcas/downloads/pdf/agencies/nyc_eeo_policy.pdf.

Any member of the public who requires an auxiliary aid or service for effective communication, or a reasonable modification of policies or procedures in order to participate in our programs, services or activities (involving matters other than employment) is invited to direct their needs and preferences to RCDA’s Disability Service Facilitator by email, phone or mail:

Andrew Sterrer
Disability Service Facilitator
Office of the Richmond County District Attorney

Strategic Projects and Initiatives Unit
130 Stuyvesant Place, 7th Floor
Staten Island, NY 10301
disabilityservices@rcda.nyc.gov
(718) 524-0567

Requests should be made as soon as possible but no later than three (3) business days before the scheduled program, service, or activity. Questions, concerns, or requests for additional information may be directed to RCDA's Disability Service Facilitator.

If you believe that you have been denied an auxiliary aid or service or a reasonable modification of policies or procedures that you need in order to participate in programs, services or activities provided by RCDA, please see RCDA's grievance procedure.

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

Any member of the public alleging discrimination based on disability in the provision of services, activities, programs, or benefits by RCDA may file a grievance with RCDA, which should contain:

- the name, address, telephone number and/or email of the grievant and
- information about the alleged discrimination, such as the location, date, and description of the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law.

"Grievance" is the term for the allegation filed with RCDA by a member of the public.

"Grievant" is the term for the person alleging discrimination in the grievance.

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 alleged violation to:

Andrew Sterrer
Disability Service Facilitator
Office of the Richmond County District Attorney
Strategic Projects and Initiatives Unit
130 Stuyvesant Place, 7th Floor
Staten Island, NY 10301
disabilityservices@rcda.nyc.gov (Please include “Grievance” in subject line.)

The grievance may be filed in one of two ways:

1. By submitting the grievance in writing by mail or email using the above address;
or
2. Upon request, by an alternative means and delivery, such as an in-person interview or an audio recording, describing the incident or alleged violation of the ADA, Rehabilitation Act, New York State Human Rights Law, or New York City Human Rights Law. A request for an alternative means of filing may be granted as an accommodation for a grievant with a disability.

Timeline Following Filing of Grievance

Within fifteen (15) calendar days after receipt of the grievance, the Disability Service Facilitator or designee will contact the grievant to discuss the grievance and possible resolutions.

Within fifteen (15) calendar days of this contact with the grievant, the Disability Service Facilitator or designee will provide a response in writing. Grievants may request the response in an additional format accessible to them, such as large print, Braille, or audio recording. This response will address the grievance, describe RCDA’s position, and offer options for substantive resolution of the grievance, where applicable.

When and How to File an Appeal

The grievant may appeal the agency’s decision within thirty (30) calendar days of receipt of the agency’s response.

The appeal should be mailed to:

District Attorney Michael E. McMahon
Office of the Richmond County District Attorney
130 Stuyvesant Place, 7th Floor
Staten Island, NY 10301

The appeal may be filed in one of two ways:

1. By submitting the appeal in writing and by mail using the above address; or
2. Upon request, by an alternative means and delivery, such as an in-person interview or an audio recording, describing the incident or alleged violation of the ADA, Rehabilitation Act, NY State Human Rights Law, or NYC Human Rights Law. A request for an alternative means of filing may be granted as accommodation for a grievant with a disability.

Timeline Following Filing of Appeal

RCDA's response to the appeal will be provided to the grievant in writing within sixty (60) days following receipt of the appeal. Grievants 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 the agency's decision, and offer options for substantive resolution of the appeal, where applicable.

All written grievances, appeals, and responses in connection with a grievance made to RCDA will be retained for at least three (3) years.

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

Website Accessibility Statement

The Richmond County District Attorney's Office is committed to ensuring its digital content is accessible to and usable by people with disabilities. We continually improve the user experience for everyone by applying the relevant accessibility standards.

Conformance Status

The Web Content Accessibility Guidelines (WCAG) defines 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 inform us if you encounter accessibility issues by using the Website Accessibility Feedback form below. If you require reasonable accommodation accessing a particular program or service, please reach out to RCDA's Disability Services Coordinator at disabilityservices@rcda.nyc.gov. The link to the Website Accessibility Feedback form is <https://www.statenislandda.org/accessibility/>.

Assessment Approach

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

Five Year Accessibility Plan

RCDA is developing a Five-Year Accessibility plan in accordance with Local Law 12 of 2023.² RCDA's Proposed Plan is available at <https://www.statenislandda.org/accessibility/>.

² Local Law 12 of 2023, available at <https://intro.nyc/local-laws/2023-12>