



February 16, 2024

Belinda French
Disability Service Facilitator
New York City Department of Citywide Administrative Services
1 Centre Street, 17th Floor North
New York, New York, 10007
Email address: Accessibility@dcas.nyc.gov
Filed At: <https://accessibilityplans.cityofnewyork.us/dcas/>

Re: Draft of New York City Department of Citywide Administrative Services Proposed Five-Year Accessibility Plan, Posted On Or About December 29, 2023

Dear Ms. French,

Disabled In Action of Metropolitan New York, Inc. ("DIA") submits these comments in response to the New York City Department of Citywide Administrative Services' ("DCAS") request for comments concerning its Proposed Five-Year Accessibility Plan ("Plan"), posted online on or about December 29, 2023

DIA is a fifty-one (51) year old, 501(c) (3), grassroots, civil rights organization run by and for people with disabilities. DIA's mission is to eliminate discrimination for people with all kinds of disabilities.

Addressing Workplace Inclusion on page 6 of the DCAS Plan and Working for the City of New York on page 8 of the DCAS Plan, this Plan needs to include an emergency evacuation plan for both employees with disabilities and visitors with disabilities. All DCAS staff need to be trained on what to do if a disabled person needs to evacuate in an emergency. We suggest that you allow employees to self-identify if they require assistance and be sent an email from the Fire Safety person each day to account if they are physically in the office. That way, no one will be looking to help someone who is not there. All employees need to be trained on how to evacuate people with different disabilities in emergencies and trained on how to safely transfer a person to an evacuation chair and how to safely operate an evacuation chair.

You need to have an evacuation chair in a location easily accessible and very near to the workstation/office of self-identified employees with mobility disabilities. An additional evacuation chair that could be used by other employees and visitors in an emergency evacuation should be located in a visible and easily accessible place on every floor DCAS occupies.

Finally, the DCAS Plan should state that signage instructing visitors on what to do in the case of an emergency will be posted in an easily seen location in large print and Braille and the date by which this will be accomplished.

With respect to pages 5 of the DCAS Plan Effective Communications and page 7 of the DCAS Plan Digital Access, it should be noted that effective communication not only includes when a person requests a reasonable accommodation, but also includes making your methods of communicating information to the public accessible. Thus, it includes providing written materials and accessible formats such as Braille and large print as well as accessible digital content on New York City's websites and social media. Consequently, when social media posts include photographs, other graphics there needs to be alt text provided. Further, when social media posts include videos, audio descriptions and captioning need to be provided.

On pages 7-8 of the DCAS Plan Digital Access, it refers the need to identify a list of digital assets that “will be prioritized for accessibility...” The DCAS Plan needs to include what will be done to which digital asset and when it will be done. As written, we have no idea what you are planning to do and when with respect to digital assets.

Turning to Physical Access, on pages 6-7 of the DCAS Plan, it refers to surveys of certain court buildings done by Ronnette Riley Architects, but fails to identify which court buildings Ronnette Riley Architects already surveyed and what those survey results show, as well as when the accessibility issues identified in these surveys will be rectified at each particular courthouse. At the very least there should be a link to the surveys in this Plan and a schedule identifying when each issue will be corrected at each courthouse.

With respect to the planned architectural surveys of the non-court buildings by the Steven B. Jacobs Group as well as the planned architectural surveys of the remaining court buildings by the Ronnette Riley Architects, this Plan will need to be updated to include the results of all these surveys when they occur. Today, the DCAS Plan should include a schedule identifying the specific buildings that the Steven B. Jacobs Group and Ronnette Riley Architects plan to survey and when such surveys are planned to be completed. An accessible website should be created where all these surveys from both architectural groups can be reviewed by the public, after all we paid for them.

Presently, it is unclear whether the remaining court buildings that have to date not been surveyed will be surveyed between 2024 and 2026, please set forth when such surveys are expected to be completed. Further, it is unclear in the DCAS Plan what court buildings already surveyed by Ronnette Riley Architects are listed in either of the two appendices. This needs to be clarified in the DCAS Plan.

The use of lifts should only be allowed in exceptional and unusual circumstances and should not be used in the first instance. People with disabilities do not experienced equal treatment when lifts are used to provide access instead of providing access through other means, such as ramps. When a person with a disability has to rely on a lift to access the facility, many times they have to wait for personnel to find where a key is to operate the lift and/or have to figure out how to operate the lift. Too often these lifts have weight limitations which will exclude people from being able to access the site. Finally, people with disabilities find that lifts are more often broken than working. Many times, the fact that a lift is not functional is only discovered when a person with a disability arrives at the facility and then it is too late to repair it. A concrete ramp at the main entrance is preferable. Ramps do not break down.

Turning to section "Doing Business with the City of New York- pages 8-9 of the DCAS Plan, it appears that no assessment of their accessibility to people with disabilities has been made regarding any of the programs, services and activities referred to here. Such an assessment needs to be made and stated in this Plan and the procedure presently in place of waiting until someone complains is unacceptable since it probably has and will continue to result in people with disabilities being barred from programs, services and activities.

With respect to Effective Communications on page 9 of the DCAS Plan, effective communication needs to be provided for all interactions with the public whether it be at a public meeting with vendors or another group.

Thank you for the opportunity to comment on this Plan since equal access to all New York City's services, activities and programs is important to all New Yorkers. If you would like additional information or have any questions, please do not hesitate to contact DIA at info@disabledinaction.org or president@disabledinaction.org.

Thank you for your continued work on behalf of all of us.

Very truly yours,

Jean Ryan,
President,
Disabled In Action of Metropolitan New York, Inc.,
Email address: info@disabledinaction.org