



February 16, 2024

Nicholas Astor
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Filed At: <https://accessibilityplans.cityofnewyork.us/nyc-comp/>

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

Dear Mr. Astor,

Disabled In Action of Metropolitan New York, Inc. ("DIA") submits these comments in response to the New York City Office of the Comptroller's ("OOC") 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.

There seems to have been a great deal of thought and work on accessibility in the OOC Plan. However, on page one of the OOC Plan should include the name and office address of the Disability Service Facilitator. Also, the OOC Plan should include the Relay number or some other form of alternate communication method that can be easily used by people with hearing loss or who are deaf.

In the public meeting areas, the screens are not able to be seen by everyone at the conference table. Thus, we submit that more screens or bigger screens should be provided in these areas. A date by which this could be accomplished should be included in the OOC Plan, see page 5-6 of the OOC Plan.

This Plan needs to state if assistive listening devices and assistive listening system are available in the public meeting areas and how a person can access them at a meeting. It needs to be remembered that people with hearing loss cannot hear others around a big table.

It is good that you are removing unnecessary furniture that creates obstacles to moving around.

Accessibility is imperative in bathrooms! You should not explore it, just make a bathroom accessible even if you have to take space from something else. Employees and visitors need an accessible restroom. It is not optional. It is required by law.

We applaud OOC for having an evacuation plan for employees, that OOC has a procedure in place that allows employees to self-identify if they require assistance and that the evacuation plan requires that an email from the Fire Safety person must be sent each day to account if employees with disabilities are physically in the office, see pages 6-7 of the OOC Plan.

However, the OOC Plan should also include visitors with disabilities in OOC's evacuation plan. Further, this OOC Plan should state that all OOC staff need to be trained on what to do if a disabled person needs to evacuate in an emergency. Additionally, the OOC Plan should state that 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.

OOC needs 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 OOC occupies. The emergency evacuation plan in the OOC Plan should state when evacuation chairs will be acquired, when all employees will be trained on what this is and how to properly operate it.

Finally, the OOC Plan should state that the OOC will post signage instructing visitors on what to do in the case of an emergency evacuation in an easily seen location, in large print and Braille. So too, the OOC Plan needs to state the date by which the posting of this necessary signage will be accomplished.

Turning to page 4 of the OOC Plan, the OOC Plan should specifically identify what acute physical accessibility issues exist and the dates by which the OOC correct these existing accessibility issues. Additionally, the OOC Plan needs to state when it will memorialize its process for informing DCAs about acute physical accessibility issues and by what date will OOC work to establish a service level agreement for repairs.

Turning to signage on page 5 of the OOC Plan, updating signage is crucial and urgent, especially for visitors in the Municipal Building, which is one of the most difficult and confusing buildings to navigate. The Plan needs to identify what signage will be updated and when signage be updated. We submit that this needs to be done very shortly.

On page 7 of the OOC Plan, it states that "OOC will begin to memorialize accessibility-focused external work on a dedicated page on the official OOC website." We submit that a hyperlink to this page should also be included in the OOC Plan since it would help people with disabilities to access it.

On page 11 of the OOC Plan, it lists a number of hyperlinks to training courses, which is helpful. However, such hyperlinks at the present time do not work and this needs to be corrected.

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.

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

Very truly yours,

Jean Ryan,
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