



February 16, 2024

D. Miguelina Zorilla-Aristy  
Assistant Commissioner  
Office of Equity and Inclusion  
New York City Police Department  
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Email address: DSNYPD@nypd.org  
Filed At: <https://accessibilityplans.cityofnewyork.us/nypd/>

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

Dear Ms. Zorilla-Aristy,

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

## **General Observations:**

There are not enough specifics in the NYPD Plan. The NYPD Plan refers to a lot of documents that are internal and are not available to the public. NYPD should put a hyperlink to the documents mentioned in the NYPD Plan or attach them to the NYPD Plan. Further, the NYPD needs to state how these policies, procedures, guides and guidelines are implemented.

There are all kinds of disabilities, and the NYPD Plan needs to consider in greater detail how people with hearing, sight, and cognitive disabilities will be able to access the stationhouses and the programs, services and activities provided by the NYPD. The NYPD Plan needs to state in specific details what the NYPD intends to do to make its programs, services, activities and facilities accessible to people with various disabilities and when and where the NYPD will accomplish this.

## **Vision:**

It is great that the NYPD's vision, stated on page 3 of the NYPD Plan, is "to foster a safe and fair city by incorporating Neighborhood Policing into all facets of Department operations . . . ." However, it is puzzling how the NYPD expects to do this if, as the NYPD states on page 9 of the NYPD Plan, the NYPD only "anticipates completing the 16 hub sites by 2027"?

## **Surveys for Access:**

The NYPD Plan states on page 4 that seventy-six (76) out of seventy-seven (77) precincts were surveyed. The NYPD Plan needs to explain in the final Plan why all of the precincts were not surveyed.

The Plan mentions surveys of twenty-eight (28) precincts by Urbahn Architects (pages 8 and 24 in the NYPD Plan), but a federal court found Urbahn Architects' survey work to be unreliable; therefore, it is improper for the NYPD to rely on such

surveys in making stationhouses accessible when the survey was not done properly in the first place. Those 28 surveys should not be relied upon by NYPD and those 28 facilities need to be re-surveyed.

### **Goals:**

Remediating stationhouses either partially or completely, as mentioned in the second bullet point on page 4 of the NYPD Plan, needs to specifically identify what the NYPD intends to remediate and also state when the NYPD will start the remediation work and when it will be completed. The NYPD Plan's second bullet point's goal only refers to accessibility for people with mobility disabilities but it should cover all types of disabilities. The NYPD Plan needs to state specific timelines for when the NYPD intends to reach each goal on page 4 like other agencies have done in their plans. Details and timelines and deadlines need to be stated in the NYPD Plan. The NYPD mentions its goals, but it has been 51 years since Section 504 was enacted, and the NYPD was supposed to start making its facilities, programs, services and activities accessible to people with disabilities and still we are waiting for equal access.

### **NYPD's Compliance with the ADA to Date:**

In the NYPD Plan, the NYPD refers to many policies and procedures but does not make the policies and procedures it refers to and relies on in the NYPD Plan available to the public. Thus, we have no idea what the NYPD purportedly is doing as well as what the NYPD intends to do.

For example, on page 6, item "g" of the NYPD Plan, the NYPD Plan refers to the fact that the Department "has a policy that provides for the relocation of public meetings scheduled to take place in stationhouses, facilities, and shared spaces that are not accessible to people with mobility disabilities to an accessible location" but does not include the policy nor describes how a

person requests a relocation of a meeting nor how the NYPD purportedly accomplishes such relocations. Significantly, why is the NYPD allowing any public meetings to be held in inaccessible places in the first instance? The NYPD's holding of public meetings in accessible locations is discrimination since it prevents people with disabilities the opportunity to attend a public meeting at the last moment like their neighbors can and forces a person with a disability to take several steps to get a meeting relocated; additional actions that are not imposed on other members of the public.

Another example is on page 8, item "q" of the NYPD Plan, the NYPD Plan refers to the fact that the Department's Facilities Management Division ("FMD") developed a policy through which all plans for new construction and major renovations are reviewed for ADA compliance but does not include the policy nor does the NYPD Plan state how this policy ensures that all new construction and major renovations comply with the ADA nor what does the NYPD consider to be a "major" renovation. We submit that any renovation must comply with the ADA as well as state and local laws concerning accessibility.

### **Disability Service Facilitator (DSF):**

In the NYPD Plan on pages 5 and 6, it mentions the Disability Service Facilitator (DSF) but on page 19 of the NYPD Plan, the name of the DSF is not stated nor is the email address provided for the DSF, and we think it should be provided. Looking at the MOPD site, we found the email address, as [DSFNYPD@nypd.org](mailto:DSFNYPD@nypd.org) but we submit that the email address should be changed to [accessibility@nypd.org](mailto:accessibility@nypd.org) for simplicity's sake and to be in alignment with other City agencies' Disability Services Facilitator's email addresses.

Also, the NYPD 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.

## **NYPD Plan for Transporting Wheelchairs of Injured Persons Being Transported by Ambulance:**

In an emergency, NYPD has a program in place for the Emergency Services Unit ("ESU") to safely transport people with mobility disabilities' equipment, such as wheelchairs, scooters or walkers, to a safe place until the person is able to claim it. This program needs to be stated and discussed, in detail, in the NYPD Plan. More specifically, the NYPD Plan needs to state whom a person needs to contact when such assistance is needed and how the public can contact the proper person to have mobility equipment transported to a safe place until it can be picked up. Additionally, the NYPD Plan needs to state when all police officers will be trained in how to arrange for equipment to be picked up. The NYPD Plan also needs to identify the office that takes the calls or emails and specify the email address, telephone number and Relay number that one contacts. Further, the NYPD Plan should state whether the email address and numbers are monitored and responded to seven days a week and twenty-four (24) hours a day. If presently, this does not exist, the NYPD needs to state when the NYPD will implement steps that will ensure that this email and numbers are monitored and responded to seven days a week and twenty-four (24) hours a day. Right now, hardly anyone knows about this program or how to use it. Also, the NYPD Plan needs to state the procedure a person needs to follow to have their equipment returned to them. All this information needs to be included in the NYPD Plan and should be posted on the NYPD website.

**Holding Cells:**

Addressing, the NYPD Plan on page 14, section f, second bullet point, we are concerned by the statement which states that when "holding cells are renovated in the future, designation of an accessible cell which can accommodate people who use wheelchairs will be considered." This statement fails to acknowledge that when making renovations, you trigger the ADA's guidelines which require that the NYPD have at least one accessible holding cell. So "considering" is not enough.

**Home Visits by Police:**

In the NYPD Plan on page 17, the Plan refers to home visits as an option to providing access to people with disabilities. We submit that generally speaking, home visits by the NYPD should not be the first option to provide accessibility because most people do not want their neighbors to know that they are communicating with the police.

**Emergency Evacuation:**

Finally, the NYPD Plan needs to include an emergency evacuation plan for both employees with disabilities and visitors with disabilities. All NYPD 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.

NYPD 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 NYPD occupies.

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

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](mailto:info@disabledinaction.org).

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

Very truly yours,

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