



February 16, 2024

To whom it may concern:

As the Museum, Arts and Culture Access Consortium (MAC), we were thrilled to see the release of this plan for comment. We are excited about the commitment to accessibility and would also like to share our feedback as one of the premier resources for cultural accessibility in the city. The NYC Cultural Plan reflected an ambitious vision for moving accessibility forward in the cultural sector, particularly in funding disability artistry. However, this 5 year plan does not offer a commitment to continuing to build upon that momentum. Conversely, the deliverables in this plan focus on elements that are either already required by law, or widely understood to be a baseline expectation. It is disheartening that the city's agency focused on supporting arts access for all New Yorker does not have more significant goals for engaging over 10% of New Yorkers. We are in agreement of the 5 actions listed by other commenters (Support disabled people to lead, Make disability-affirmative employment real, Be transparent about your capacity, Prepare the next administration, and Strengthen the Cultural Development Fund review process). We would also like to offer additional feedback. Please see some additional feedback below.

- A. Digital Access & Programmatic Access: Striving to meet WCAG 2.1 Level AA standards are understood as a baseline for digital accessibility. While it is key to involve user feedback through surveys and other methods, can DCLA commit to a standard that is more rigorous? For example, is there funding or personnel focused on meeting this standard? Can feedback include focus groups with disabled users who are paid for their feedback? It is surprising that videos are not captioned as a standard. MAC recently completed a project called Mapping Virtual Access in Cultural Institutions where we worked with the disability community to understand best practices in virtual access and are happy to share this work.
- B. Physical Access & Programmatic Access: This section does not commit to making any changes to buildings, beyond "exploring." It also does not acknowledge physical access beyond wheelchair accessibility. For example, can the workspaces be reviewed for lighting and sensory elements? Are the restrooms designed to accommodate companions? Are there hearing loops installed in spaces where there are public meetings?
- C. Workplace Inclusion & Effective Communication
  - a. Policy & Plans: This section does not include any information on how this will be achieved.
  - b. Inclusive Hiring and Recruitment: This section is policy-compliance focused, rather than a strategy toward recruiting and engaging disabled workers. Is NYC: AT WORK, or any job service agency, a partner in recruiting for open roles? Are



hiring managers trained in inclusive hiring practices? How are disabled employees supported, once hired? If this is included elsewhere, it would be helpful to make that explicit.

- c. Accommodations Procedures: This mirrors the law and is not a goal that reflects a commitment to inclusive workplaces.
- d. Employee Resource Groups: What agency and power does the ERG have in informing practice? Do they have a budget? How active are they? Have their suggestions resulted in action?
- e. MAC's Supporting Transitions project focuses on creating cultural opportunities for adults with intellectual and developmental disabilities and employment is a key focus of this project. We can share our work in this area and are excited to collaborate with cultural organizations on inclusive and accessible employment.

- D. Effective Communication / Assistive Listening: This section does not set any goals in increasing access to the public through accommodations. For example, is there a policy in practice for the public to request accommodations for events? How are accommodations fulfilled? Does DCLA have a standard practice of having ALDs, accessible seating, captioning, etc, for all events, or only by request (putting the labor on the individual attending, not the agency).

In addition to the desire for more detail in the plans stated above, we also noted that the methodology section did not include reference to engaging the disability community in the creation of this plan. Also, by offering only written format ways to give feedback, a huge swath of disabled New Yorkers are left out of this process. Through this plan, we hope to understand how DCLA supports advancing access for all New Yorkers, including funding disabled artists, convening grantees to advance accessibility in their organizations, and empowering disabled people to become artists, cultural workers and audience members. In conclusion, MAC asks for more from DCLA in regard to their commitment to New York City's disabled New Yorkers, and offers our work as a partnership in these efforts. MAC is a frequent convener for the cultural community. We offer training and could partner on training efforts including support and training for DCLA. We also have strong ties to the disability community and can offer support in goal setting alongside disabled people involved in the arts as audiences, artists, and cultural workers.

Thank you for your commitment to accessibility and your request for feedback. We are appreciative of the work you do for the cultural field.

Sincerely,

The Advisory Board  
Museum, Arts and Culture Access Consortium (MAC)