



February 16, 2024

Anna Martinez
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New York City Commission On Human Rights
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Filed At: <https://accessibilityplans.cityofnewyork.us/cchr/>

Re: Draft of New York City Commission On Human Rights
Proposed Five-Year Accessibility Plan, Posted On Or About
January 4, 2024

Dear Ms. Martinez,

Disabled In Action of Metropolitan New York, Inc. ("DIA") submits these comments in response to the New York City Commission on Human Rights' ("CHR") request for comments concerning its Proposed Five-Year Accessibility Plan ("Plan"), posted online on or about January 4, 2024.

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.

With respect to Digital Access, the CHR should make its website accessible within one (1) year, that is by January 2025. Videos need to be accessible with closed captioning, audio descriptions and American Sign Language. This needs to be soon and a target date of four years from now, 2028, to accomplish this is too long. In the meantime, do not make any more videos until you can make them accessible to all New Yorkers. Thus, the CHR Plan should state that the CHR website will be made accessible within one (1) year, that is by January 2025.

Zoom is way more accessible to people with disabilities and the public than Microsoft Teams is. Thus, at the very least, Zoom should be used by CHR for public meetings and meetings with employees and this should be stated in the CHR Plan.

This Plan should specifically state when the Mayor's Office for People With Disabilities' training on creating accessible documents will be scheduled for staff.

Please state in this Plan whether all your photographs, graphics and videos are accessible to screen readers, have audio descriptions, and are captioned on social media posts. If they are not fully accessible, please state in this Plan what steps will be taken and when these steps will be accomplished to make CHR's social media posts fully accessible.

Under Programmatic Access, the CHR's Plan needs to include that accommodations for people who need to complain by Zoom are available. If this does not exist, the Plan should state what steps will be taken to make this available and when this will be accomplished.

Additionally, public meetings should be hybrid so that people can participate in person at a fully accessible location or remotely by Zoom. Audio descriptions of any slides, photographs, videos or other graphics should be provided at both in person and online meetings. Of course, all such meetings should provide closed captioning, ASL interpreters and such public meetings should be

held in rooms equipped with hearing loops. The CHR should post on its website as well as any flyers or other materials advertising the event information that states that such hearing loops are available and how this equipment can be requested before the meeting. Thus, the CHR Plan should state how these requirements will be implemented and when all these requirements will be in place.

With respect to "Effective Communication", at least four (4) staff members should be trained by the end of 2024 in Telecommunication Relay Services and the remaining staff should be trained how to use Telecommunication Relay Services no later than 2025. The CHR Plan should include this.

Written information provided, including social media must provide such materials in accessible formats. Written information must be available in alternate formats such as large print, Braille and in an audio format. Social media graphics must include alt text, and videos posted need to have captioning and audio descriptions. The CHR Plan should state how and when the CHR will have written materials provided to the public available in accessible formats and how and when its social media will be accessible.

With respect to Workplace Inclusion, CHR's Plan states that every two (2) years, employees get disability training by MOPD and DCAS. That is admirable, but what about new hires? New hires should not go a year or two without training; training should be part of their initial orientation.

We are glad that you are planning to do more with respect to workplace inclusion. That sounds good. However, instead of stating a four year spread of when the actions listed on page 8 of CHR's Plan are expected to be accomplished, please state more specifically in this Plan the dates it is expected that each action listed on page 8 of CHR's Plan will be accomplished.

What is and where is your Building Evacuation Plan for people with disabilities? 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 CHR occupies.

Finally, CHR Plan needs to state the address where the Disability Service Facilitator's office is located and a Relay number that people can use to contact the Disability Service Facilitator.

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,
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