

## NYC Vaccination Sites: How to Make Your Site Accessible for People with Disabilities

The New York City Commission on Human Rights is a resource to help businesses comply with the New York City Human Rights Law. This document provides information to ensure that vaccination sites are accessible for people with disabilities.

1. The New York City Human Rights Law requires providers of public accommodation in New York City, including city and privately operated vaccination sites, to make reasonable accommodations for people with disabilities. An accommodation is considered reasonable unless the public accommodation shows that it would cause an undue hardship.
2. Some forms of reasonable accommodations that vaccination sites must provide for people with disabilities include:
  - a. **Physically accessible entrances and interiors:** The entrance to a vaccination site must be flush with the sidewalk or have a ramp or lift. In addition, the vaccination site must ensure that there are no physical barriers inside the vaccination site (such as stairs, narrow passageways, temporary partitions, and uneven flooring) that will make it harder for people with mobility disabilities to receive service.<sup>1</sup>
  - b. **Accessible materials for people who are blind or have low vision:** If there is any paperwork, such as medical forms, that members of the public are required to complete, it should be available in alternative formats that are accessible to people with vision disabilities. Examples include large print (18pt); accessible electronic documents; and Braille. If it is not possible to provide alternative formats, staff must be available to assist people in completing the paperwork in a private setting.<sup>2</sup>
  - c. **Accessible communication for people who are Deaf or Hard of Hearing:** For individuals who are Deaf or Hard of Hearing, please be prepared to utilize a Video Remote Interpreter<sup>3</sup> or live captioner.<sup>4</sup> If these forms of communication are not available, vaccine site workers should be prepared to communicate in an alternative manner of the person's choosing, such as by writing back and forth or gesturing. Some face coverings make it more difficult for people who rely on facial expressions and mouth movement to understand when others are communicating with them. Clear face coverings may facilitate more accessible communication in those circumstances.<sup>5</sup>
3. Additional accommodations beyond those listed above may be required. If a person with disabilities requests an accommodation, the vaccination site must have a conversation with the person to help determine what type of modification or accommodation the person needs and provide an accommodation unless it would pose an undue hardship. Vaccination sites are encouraged to provide the public with information about which accommodations are already available on site and

<sup>1</sup> For more information see the *NYC Mayor's Office for People with Disabilities' Accessibility Checklist*, available at <https://www1.nyc.gov/assets/mopd/downloads/pdf/Accessibility-Checklist-Vaccine-Centers.pdf>

<sup>2</sup> For more information see the *NYC Mayor's Office for People with Disabilities Accessible Documents Guide*, available at <https://www1.nyc.gov/assets/mopd/downloads/pdf/MOPD-Accessible-Documents-Guide-2020.pdf>

<sup>3</sup> For a list of Vendors for ASL Interpretation visit <https://www1.nyc.gov/site/mopd/resources/american-sign-language-interpreters.page>

<sup>4</sup> For a list of Vendors for Live Transcription visit <https://www1.nyc.gov/site/mopd/resources/cart-vendors.page>

<sup>5</sup> See the CDC's guidance on clear face masks at <https://www.cdc.gov/coronavirus/2019-ncov/prevent-getting-sick/cloth-face-cover-guidance.html>

how to request other reasonable accommodations. Best practice is to include a name, email address and/or phone number to request reasonable accommodations on all advertisements for appointments.

To learn more about disability protections under the New York City Human Rights Law see the *Disability Legal Enforcement Guidance*, <https://www1.nyc.gov/site/cchr/law/legal-guidances.page>. For more information visit our website at [NYC.gov/HumanRights](https://www1.nyc.gov/HumanRights) or call (212) 416-0197.

For questions on physical or digital accessibility please call the Mayor's Office for People with Disabilities at (212) 788-2830 or visit [NYC.gov/Disabilities](https://www1.nyc.gov/Disabilities).