

July 23, 2020

Brenda Sue Fulton
Chair and Chief Administrator
Motor Vehicle Commission
225 East State Street
Trenton, NJ 08666

Re: DRNJ Urges NJMVC to Comply with the ADA

Dear Chief Administrator Fulton:

I write on behalf of Disability Rights New Jersey (DRNJ), the state designated protection and advocacy agency. DRNJ urges the New Jersey Motor Vehicle Commission (MVC) to immediately designate and publish a process by which disabled individuals can request accommodations to complete in-person transactions at the MVC.

The extremely high demand for in-person transactions as MVC centers reopen during the COVID-19 emergency has created a disparity in access for people with disabilities. For example, drivers with autism or anxiety disorders may not be able to wait in long lines for most of a day. Drivers with mobility or breathing impairments may not be able to wait outdoors for extended periods in the summer heat. Those with compromised immune systems or high-risk pre-existing conditions may be put at undue risk of infection with COVID-19 by spending hours in a line, especially if distancing measures and mask use by others in line is less than perfect. For these individuals with disabilities, the MVC remains effectively closed.

Although many tasks can be completed online or by mail, there are currently some transactions at the MVC that are mandated to occur in person such as registering a used vehicle, transferring a vehicle title, plate transactions, and first-time licensing.

Accommodations should include the availability of appointment times, remote completion of transactions, and other reasonable modifications of policy to ensure those with disabilities have full access to the MVC as required by Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act (ADA).

Additionally, we urge you to designate dedicated staff and communication mechanisms to promptly respond to accommodation requests. DRNJ has received reports that the general channels of communication with the MVC have been overwhelmed or unresponsive when individuals with disabilities have attempted to request accommodations.

Advocating and advancing the human, civil and legal rights of persons with disabilities

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Disability Rights New Jersey is appreciative of the work of the Motor Vehicle Commission, as well as all state agencies in this emergency – thank you. Please do not hesitate to contact me at gorlowski@drnj.org or (609) 292-9742 if you have questions regarding this matter or would like additional information. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Gwen Orlowski". The signature is fluid and cursive, with a large initial "G" and a long, sweeping tail.

Gwen Orlowski
Executive Director

GO/md