

FINAL REPORT

AIR CARRIER ACCESS ACT ADVISORY COMMITTEE RECOMMENDATIONS

Respectfully submitted to DOT Secretary Peter Buttigieg

February 4, 2022

INTRODUCTION

The Air Carrier Access Act (ACAA) Advisory Committee was appointed in 2019 to advise the Secretary of the Department of Transportation (DOT) about issues relating to the air travel needs of passengers with disabilities. It was created to identify and assess disability-related access barriers encountered by air travelers with disabilities, evaluate the extent to which DOT's programs and activities are addressing these disability-related access barriers, and recommend actions to improve the air travel experience of passengers with disabilities.

Membership

As required by the Federal Aviation Administration (FAA) Reauthorization Act of 2018 (P.L. 115-254), the DOT Secretary appointed at least one representative from each of the following groups: passengers with disabilities; national disability organizations; air carriers; airport operators; contractor service providers; aircraft manufacturers; wheelchair manufacturers; and national veterans' organizations representing disabled veterans. For certain categories, there are more than one representative to ensure multiple perspectives are represented and membership is balanced. James Sinocchi, a business executive who is a C5-C6 quadriplegic, was appointed ACAA Advisory Committee Chair.

First Plenary Meeting of the ACAA Advisory Committee: March 10 and 11, 2020

The Advisory Committee kicked off its work in Washington, D.C., by gathering information on the barriers encountered by passengers with disabilities in the following areas: ticketing; pre-flight seat assignments; access to bulkhead seating; stowage of assistive devices; and guide and wheelchair assistance at airports and on aircraft.

Advisory Committee members also discussed airlines' disability training programs for both employees and contractors who interact with the traveling public.

At the meeting, Advisory Committee members were briefed on various types of programs and activities related to the air travel of passengers with disabilities:

- Representatives of the Aira smartphone app showed how it supports access and navigation by connecting a blind or low-vision person to a highly trained sighted agent.
- A representative from the International Air Transport Association (IATA) reviewed accessibility improvements being driven through innovation.
- DOT officials delivered presentations that reviewed topics including safety of assistance and training, accommodation requests, seating accommodations and SSR codes.

[The [Non-rulemaking Docket](#) created by the Department of Transportation for the ACAA Advisory Committee provides copies of presentations made at the first plenary meeting, along with minutes of the meeting.]

In addition, DOT consulted with the Advisory Committee on the development of an “Airline Passenger with Disabilities Bill of Rights” (which remains in draft in 2022).

The Bill of Rights describes the 10 fundamental rights of air travelers with disabilities under the ACAA and the Department’s implementing regulation.

An attorney with DOT's Office of Aviation Consumer Protection delivered an overview of the draft Bill of Rights, which provides the right to:

- 1) Be Treated with Dignity and Respect
- 2) Receive Information About a Flight's Limitations
- 3) Receive Information in an Accessible Format
- 4) Accessible Airport Facilities
- 5) Receive Prompt and Adequate Wheelchair, Guide and Other Assistance at Airports and on Aircraft
- 6) Preboard
- 7) Travel with an Assistive Device or Service Animal
- 8) Receive Seating Accommodations
- 9) Accessible Aircraft
- 10) Resolution of a Disability-Related Issue

Advisory Committee members presented their views on different components of the Bill of Rights, which are documented in the [meeting minutes on file with DOT](#).

During the Advisory Committee meeting, various Committee members were named to three Subcommittees to research, discuss and develop recommendations to address:

- Ticketing Practices and Seating Accommodation
- Stowage of Assistive Devices
- Assistance at Airports and on Aircraft and Related Training

Each Subcommittee was assigned the task of examining the barriers encountered by passengers with disabilities traveling on aircraft, providing recommendations to the Advisory Committee on best practices for reducing any such barriers and determining whether current regulations should be modified or prescribed accordingly.

Due to the COVID-19 pandemic, the Subcommittees held their meetings virtually during 2020 and 2021. In July of 2021, each Subcommittee documented its recommendations for the full Advisory Committee to consider. [The [Non-rulemaking Docket](#) created by the Department of Transportation for the ACAA Advisory Committee contains the summary findings of each Subcommittee, as well as minutes of the final ACAA Advisory Committee meeting .]

Second Plenary Meeting of the ACAA Advisory Committee: September 2, 8 and 9, 2021

The Advisory Committee's final meeting took place, virtually, over three days. Committee members continued their discussion of the draft Airline Passenger with Disabilities Bill of Rights and deliberated over the recommendations of the Subcommittee on Ticketing Practices and Seating Assignments, Stowage of Assistive Devices and Assistance at Airports and on Aircraft and Related Training.

Following presentations by DOT officials, the Advisory Committee voted on their recommendations to DOT Secretary Peter Buttigieg and appropriate committees of Congress. The Committee's 26 recommendations are presented on the following pages.

AIR CARRIER ACCESS ACT ADVISORY COMMITTEE RECOMMENDATIONS

The Advisory Committee is recommending implementation of the following 26 actions to improve the air travel experience of passengers with disabilities. Beneath each recommendation is the rationale and supporting documentation that was evidenced at the Subcommittee level. This robust discussion informed the full Committee as it arrived at its final recommendations (which are detailed under the three Subcommittee headings that follow).

Ticketing Practices and Seating Accommodations

1. The Committee recommends establishing a working group, led by the International Air Transport Association (IATA), to address how airlines and ticket agents can improve the consistent application of special service accommodations for persons with disabilities, including the consistent application of Special Service Request (SSR) codes and free form text. The working group would include representatives of airlines, airports, contract service providers, ticket agents and disability organizations. The working group would also address the frequency of training for airline and ticket agent personnel on SSR codes as appropriate to their duties, including consideration of the benefits of annual training. The working group shall set forth an action plan to address these issues no later than one year after its establishment.

Air passengers with disabilities may depend on airlines to provide assistance to facilitate their travel experience. Airlines and travel agents process requests from passengers with disabilities for special accommodations and transmit those requests in the form of international standardized SSRs, both at the time of booking and thereafter until travel with the airline is completed.

IATA Resolution 700 “Acceptance and Carriage of Passengers Requiring Special Assistance” governs this process. The A4A/IATA Reservations Interline Message Procedures (AIRIMP) — the communication protocol governing reservations procedures between a booking source and an airline — are globally and universally agreed upon communications standards used between travel agency systems and airline systems, as well as between different airlines.

Some airlines and travel agents may use additional codes not included in the IATA Resolution 700. Because these additional codes are not standardized, they may not be recognized and processed by other airlines’ and ticket agents’ systems. This can result in inconsistencies in the service provided by different airlines.

Committee members unanimously recommended the establishment of a working group led by IATA to address the need for consistent application of SSR codes by airlines and ticket agents. It was agreed that such a working group should include representatives of airlines, airports, contract service providers, ticket agents and disability organizations.

2. The Committee recommends that as a matter of best practice, airlines and ticket agents train reservation agents and other personnel involved in applying disability-related service requests on the correct usage and application of these requests including the consistent application of SSR codes.

The Subcommittee discussed the benefit of training on proper usage of SSR codes, given the varying airline SSR code practices discussed concerning the prior recommendation. A best practice of training

for airlines and tickets on SSR codes could assist those entities that have challenges applying SSR codes consistently and correctly. Committee members unanimously approved the recommendation.

3. The Committee recommends that airlines consider, as a best practice, adding the capability to retain requests for special accommodations in future upgrades of their frequent flyer systems. The Committee notes that the ability of airlines to follow this best practice will depend in part on their ability to meet the requirements of applicable privacy regulations and the restrictions on the storage and use of sensitive health data. Passengers would need to provide their consent to the storage and use of this information for accommodation purposes and accept responsibility for ensuring that the information is accurate and up to date.

Airlines, their vendors and travel agents are committed to ensuring that passengers are able to request and receive accommodations in a timely manner. When travelling by air, passengers with disabilities may require services and assistance to facilitate their travel experience. [As stated in recommendation #1, airlines take requests from passengers with disabilities for special accommodations and input that request into airline systems through international SSRs, both at the time of booking and thereafter until the passenger's travel with the airline is complete.]

Passengers can submit requests for accommodations to the airline at the time of booking, prior to travel or on the day of travel. For planning purposes, airlines prefer to be notified of these requests as far in advance as possible.

Some of the Subcommittee members believed — for some passengers with disabilities — this means submitting requests for accommodations each time they book a reservation which, depending on the airline or travel agency accepting the reservation, can be time consuming and confusing. The Committee explored whether passenger requests for special accommodations can be stored by the airlines for future flights taken by that passenger, particularly when it is known that the passenger has a permanent disability that requires accommodation on all flights going forward.

The Committee heard from various stakeholders and learned that, because airlines and travel agents utilize a vast variety of platforms and user interfaces to accept reservations, there may be compatibility issues. These issues can prevent the storage of accommodation requests in the current state and with existing standards, as well as connecting passengers across bookings — especially when bookings are made through third party agents. Additionally, modifying frequent flyer programs and reservations systems would require significant capital investment and resources from airlines and travel agencies; however, future systems and enhancements could allow for the storage of this information. Further, the Committee considered current and future privacy laws and regulations that would pose a significant barrier because airlines would potentially need to establish dozens of complex privacy policies and administer those policies for different passengers based upon an endless number of combinations. In addition, airlines would need to put systems in place to ensure that passengers can keep information up to date and accurate, and safely retained. Failure to do so could expose airlines to liabilities far above and beyond what they currently do to support the needs of passengers with disabilities.

Lastly, the Committee discussed the fact that, even for passengers with permanent disabilities, needs for accommodations can change — and airlines are only able to provide proper accommodations based on the information available to them. The storage of this information assumes that passengers who do so will be provided this accommodation every time they fly on the airline, regardless of the actual need for the accommodation. However, an accommodation is not necessarily required for every trip — for

example, temporary disabilities such as a broken leg. Airlines would not be qualified to determine or validate whether a disability is temporary or permanent, or the duration of a disability as they rely on the information provided by the passenger.

Given the global nature of aviation and the evolving state of privacy rules — as well as the various technology-related challenges that exist — Committee members unanimously approved the recommendation for airlines to consider storing disability accommodation information in frequent flyer accounts as a best practice. The Committee agreed that some passengers would benefit from this practice but acknowledged that individual passengers would need to provide their consent to the storage and use of their personal health data and information for accommodation purposes. Passengers would need to accept responsibility for ensuring that the information is accurate and up to date.

4. The Committee recommends that airlines, airports, travel agents, national disability organizations and DOT (Department of Transportation) coordinate on a public awareness campaign to educate the traveling public on the different types and levels of accommodations that airlines can provide to passengers with disabilities. DOT will lead the coordination of the public awareness campaign.

When a traveler requests special assistance, an airline makes that request known in their ticket record by using an SSR code. Upon learning that airlines use many different SSR codes, it was determined that travelers with disabilities may not be fully aware of the types of disability-related accommodations airlines provide to passengers — or how airlines code those accommodations.

While many national disability organizations use a variety of channels (e.g., webpages, emails, newsletters, social media) to discuss the rights of passengers with disabilities regarding air travel and provide them with resources, specific information about the different types of accommodations — or the SSR codes used — is not readily available.

Under DOT rules, airlines must have a mechanism on their primary websites for people with disabilities to request disability accommodation services for future flights, including but not limited to wheelchair assistance, seating accommodations, escort assistance for a visually disabled passenger and onboard stowage of an assistive device.

The Ticketing and Seating Subcommittee reviewed the online accommodations request forms developed by several U.S. and foreign airlines to comply with this provision and found that airlines' online accommodations request forms vary widely. The Subcommittee also found that — due in part to these differences and variations — passengers with disabilities may not be aware of the different types and levels of accommodations that the airlines offer. This may result in miscommunication and passengers with disabilities receiving inadequate assistance and accommodations.

As a result of these findings, the Committee unanimously approved the recommendation that airlines, national disability organizations and DOT create a public awareness campaign to educate the traveling public about the variety of accommodations available to passengers with disabilities. The national disability organizations then can use their networks to promote the dissemination of information and educate the traveling public on the different types and levels of accommodations that airlines provide to passengers with disabilities.

5. The Committee recommends establishing a working group, led by IATA, to develop an improved consistent disability accommodations request form that airlines and passengers would be encouraged

to use. The working group will, at a minimum, address placement of the form, develop a form that is both usable online and in print, and ensure that the form is written in plain language. The working group would include representatives of airlines, airports and disability organizations.

The Department's regulation implementing the ACAA requires airlines to have a mechanism on their primary websites for persons with disabilities to request disability accommodation services for future flights, including but not limited to wheelchair assistance, seating accommodations, escort assistance for a visually impaired passenger and onboard stowage of an assistive device [14 CFR 382.43(d)]. The Department regulation does not specify a particular format for the form. In practice, accommodations forms vary in terms of format and content.

The Committee members discussed extensively the content of the format and whether the Committee could aspire to a universal form. The Committee concluded that different laws in different jurisdictions make it difficult to have a universal form but called on airlines to develop as consistent a form as possible. The Committee recommended that the form be in plain language and available on demand on the airlines' websites. The Committee unanimously recommended that IATA work with disability advocates, airlines, travel agents and airports to develop this updated disability accommodations form.

6. The Committee recommends that as a matter of best practice, airlines and ticket agents provide written confirmation to passengers who submit disability accommodations requests.

Airlines report that they are better able to accommodate the needs of passengers with disabilities when they receive accommodations requests prior to the day of travel. Some passengers with disabilities express frustration that they alert airlines and ticket agents about needed accommodations but then discover there is no record of their request. This may lead some passengers with disabilities to forgo advance notice of their needs, assuming it will not improve their air travel experience.

The Ticketing and Seating Subcommittee determined that passengers who make disability-related accommodations requests do not typically receive a written confirmation; thus, they are unable to confirm that the request was received and understood. Disability community representatives noted that lack of confirmation often leads to anxiety for passengers with disabilities and requires them to call airlines, which can be a lengthy process. Airline representatives discussed the problems that they have receiving such requests when bookings are made through travel agents or other third parties. The Subcommittee felt that providing written confirmation would not only provide assurance for passengers but also provide opportunities for any needed corrections to the accommodations requests.

During Committee discussion, an airline representative stated that airlines attempt to provide written confirmation when they receive requests directly from the passenger. Another airline representative noted that when tickets are purchased from third parties the airlines have less opportunity to communicate directly with the passenger.

The Committee unanimously approved the recommendation. Ensuring that passengers who make disability accommodations requests receive written confirmations will facilitate passage of the request within the airline — or from the ticket agent to the airline — and provide the passenger with assurance that it has been received.

7. The Committee recommends that before issuing a Notice of Proposed Rulemaking (NPRM) on seating accommodations for passengers with disabilities, DOT should initiate an Advanced Notice of

Proposed Rulemaking (ANPRM) within one year of receiving the Committee’s Report to gather information and data to better understand: (a) the scope of passengers with disabilities who should be afforded bulkhead seats or seats with extra legroom; and (b) whether passengers with disabilities who require a bulkhead seat or seats with extra legroom are currently unable to obtain such a seat.

Before assigning bulkhead seats to other travelers, DOT requires airlines to provide these seats to passengers traveling with a service animal — or those who have a fused or immobilized leg — and self-identify as needing to sit in a bulkhead seat. Airlines are also required to provide bulkhead seats to passengers with other types of disabilities to access air travel — if these seats are available.

While airlines use different ways to make this happen, not all provide advance seat assignments. In addition, if a person with a disability needs a bulkhead seat to accommodate his or her disability, the airline is required to assign the person a bulkhead seat without charging a fee, provided the seat is in the same class of service as the ticket purchased by the passenger.

During the Ticketing and Seating Subcommittee’s discussions, national disability rights advocates expressed concern about the availability of these seats on aircraft. Because bulkhead seats usually have extra leg room, many airlines today classify these bulkhead seats as “Economy Plus” or “Premium Economy,” a class of service higher and more expensive than Economy. As a result, on some aircraft, the bulkhead seat may not be available in basic economy class. Because airlines do not have to upgrade a person with a disability to a higher class of service in order to accommodate his or her disability, the advocates expressed concern that individuals with disabilities purchasing economy tickets may not receive seating that accommodates their disability. They also expressed concern that the current regulation offers priority access to bulkhead seats only to people traveling with a service animal and people with a fused or immobilized leg.

It was noted that the 2016 FAA Extension, Safety and Security Act requires DOT to initiate a rulemaking to address: 1.) whether to broaden the scope of passengers with disabilities who must be afforded seats with extra leg room and 2.) whether carriers should be required to provide seating accommodations with extra leg room in all classes of service.

Following discussions that produced differing views on bulkhead seat availability — from the potential safety, operations and financial impact for airlines to the fact that FAA safety regulations do not permit certain passengers with disabilities to occupy Exit Row seats — Subcommittee members agreed that information regarding the actual availability of bulkhead seating was insufficient.

The Committee unanimously recommended that more information should be gathered through an Advanced Notice of Proposed Rulemaking (ANPRM) before a Notice of Proposed Rulemaking (NPRM) is issued on seating accommodations for passengers with disabilities. It was noted that DOT welcomes stakeholders (e.g., disability organizations) to submit data that is relevant for the rulemaking.

Stowage of Assistive Devices

1. The Committee recommends that DOT and the Food & Drug Administration (FDA) encourage the Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) to adopt the proposed wheelchair air transport standards, which include provisions on labeling and travel

configuration cards, and at a later date, RESNA should add a reference in Section 15 to recognize that air transport standard. This would not require any carve-outs to the standards.

Damage to wheelchairs and scooters in air travel remains a significant source of concern for passengers with mobility disabilities. Much of the damage to wheelchairs, particularly power wheelchairs and scooters, occurs when the devices are stowed in an aircraft's cargo compartment.

The Stowage Subcommittee agreed that ensuring wheelchair and scooter users have information to provide to airlines regarding their devices would improve their handling. During its review, the Subcommittee considered efforts to address wheelchair damage undertaken by the Canadian Transport Agency and RESNA. The Subcommittee opted to make a recommendation for RESNA and ISO (International Organization for Standardization), wheelchair standards-setting organizations, to modify their requirements for information, disclosure and documentation for wheelchairs and scooters — including for identification of securement points “so as to create a labeling mandate for wheelchair manufacturers on any new devices.”

During Committee discussion of the Subcommittee's recommendation, a representative for wheelchair manufacturers explained that including the labeling requirements in RESNA Section 15 ([ANSI/RESNA WC-1](#)) would increase their adoption by manufacturers because complying with the standard facilitates the FDA's device review process. Members of the Committee raised the existing RESNA Standards Committee on Assistive Technology for Air Travel (ATAT), which is focused on air transport of wheelchairs and scooters. Based on concerns that recommendations not in line with the ATAT Committee efforts could lead to delays, the Committee unanimously approved an amended recommendation encouraging RESNA to adopt labeling and travel configuration cards for wheelchairs as developed by the ATAT Committee and subsequently add a reference in Section 15 to adopted requirements.

On September 30, 2021, following the Committee's adoption of the recommendation, RESNA published [ANSI/RESNA AT-1, Section 4: Labelling and Design Requirements for Mobility Devices Designed for Stowage and Transport in Commercial Aircraft](#). The RESNA AT-1 Section 4 standard contains all the information needed by airlines to create templates now to request needed information from passengers (see Section 4, Annex B). The only item not included is the weight without batteries, which could be collected if needed.

2. The Committee recommends establishing a working group, led by IATA, to examine improving airline checklists and forms for handling wheelchairs to make the checklists and forms more consistent across airlines and written in plain language. The working group would include disability organizations, airports, aircraft manufacturers and wheelchair manufacturers.

Mobility devices such as battery-powered wheelchairs and scooters are not specially designed by wheelchair manufacturers for transport in aircraft cargo compartments and may not fit in certain aircraft cargo compartments. In addition, wheelchairs' weight may exceed aircraft cargo compartment limitations, as well as aircraft weight and balance safety requirements.

The dimensions of the cargo doors on certain types of single-aisle aircraft can be problematic for the transport of battery-powered wheelchairs and scooters, as the cargo doors are too small to permit a battery-powered wheelchair to be maintained upright while loaded into the cargo compartment.

Damage to the device can result if it must be laid on its side to fit through the cargo door opening; if it does not fit, it may result in the device not being able to be transported. Similar problems also may occur on wide-body aircrafts but are not as prevalent on such aircraft because they usually have larger cargo doors.

Advance notice to airlines by passengers with disabilities who will be travelling with a battery-powered wheelchair or a scooter provides airlines with the time necessary for logistical planning to ensure that such devices can be accommodated. Some airlines currently ask passengers traveling with battery-powered wheelchairs or scooters to complete a mobility device handling form prior to a flight to ensure that an assistive device is properly handled during transport. Airlines tailor these forms to fit their operational needs, but there is not a common practice in this regard.

Airline members shared and examined existing checklists and forms from Delta Air Lines and Alaska Airlines, which include fields such as device dimensions when folded; battery type; list of removable parts; and recommendations for lifting points and brake release locations. Airline representatives explained that the information on these checklists can be crucial to determining how to safely handle a unique battery-powered wheelchair or scooter and whether the device can fit safely on a given aircraft.

Committee members unanimously agreed that such forms are valuable for proper handling and stowage and recommended that IATA facilitate a working group to improve consistency within existing checklists and forms for handling wheelchairs. However, the Committee declined to specify what needs to be included on such forms, deferring to the IATA-led working group.

3. The Committee recommends that airlines, DOT and disability rights organizations continue educating consumers about the benefits of providing advance notice of traveling with a wheelchair or scooter, as well as sharing information about such devices with airline or contractor personnel handling the devices, such as the size and weight of the mobility aid and battery type if applicable. The Committee encourages airlines, DOT and disability rights organizations to consider using different mediums to enhance or increase passenger education as well as taking a unified approach regarding passenger education as appropriate.

Passengers with disabilities who use wheelchairs or scooters are encouraged by airlines to provide information about how to properly stow their device to prevent damage. ACAA regulations allow airlines to require passengers with disabilities who use power wheelchairs to provide 48-hour advance notice if they will be traveling with their device on a plane with fewer than 60 seats [14 CFR § 382.27(c)(4)]. Otherwise, individual wheelchair and scooter users are not required to provide advance notice of their travel.

The Stowage Subcommittee determined that educating passengers about how they can assist the airline in preparing for transport of their device could help ensure that it is not subsequently mishandled. Providing advance notice allows airlines to position equipment and personnel to facilitate loading of the device. Notice is particularly important for smaller airports that have fewer resources.

The Subcommittee rejected allowing airlines to require a 48-hour advance notice for passengers flying on single-aisle aircraft with wheelchairs or scooters due to concerns that such a requirement would be unduly burdensome for these passengers. Instead, the Subcommittee unanimously agreed to recommend a collaborative effort to educate passengers with disabilities about the benefits of sharing information in advance with the airlines about their wheelchairs and scooters.

The Committee unanimously approved this recommendation. Prior to the vote, an airline representative noted that the recommendation is about creating passenger awareness of the benefits of providing advance notice. A member of the Committee representing veterans organizations noted that the RESNA ATAT, which includes airlines, wheelchair manufacturers and disability organizations, is involved in efforts to help passengers better prepare their wheelchairs for transport.

4. (a) The Committee recommends that, as a best practice, aircraft manufacturers have, as a standard feature on newly purchased aircraft, tie-down locations in the bulk cargo compartment for the securement of wheelchairs and scooters. The Committee notes that, for containerized cargo compartments, wheelchairs and scooters are typically transported separately in a container or on a pallet.

(b) The Committee recommends that, as a best practice, airlines have procedures and equipment in place for the strapping of wheelchairs and scooters in the cargo compartment, when tie-down locations are available in the aircraft.

(c) The Committee recommends that, as a best practice, wheelchair manufacturers have adequate securement points that meet the WC-19 (RESNA Section 19) standards as a standard or optional feature on new wheelchairs and scooters. The Committee notes that some passengers with disabilities may not be able to afford a wheelchair that meet the WC-19 standard and thus may not be able take advantage of the feature.

(d) The Committee recommends that airlines, as a best practice, secure wheelchairs or scooters transported in the aircraft cargo compartment unless: (i) straps or other equipment needed to secure the device are not available, (ii) the device does not have securement points, (iii) the aircraft does not have a designated location to secure the device, or (iv) the device does not fit within the aircraft cargo compartment.

(e) The Committee recommends that, for wheelchairs and scooters that are not transit compliant (i.e., do not meet the requirements of the American National Standards Institute (ANSI)/RESNA WC-19 and ISO 7176-19), RESNA develop performance standards and/or guidance for their securement (including design and strength requirements) within an aircraft cargo compartment.

The Subcommittee found that securement points play an important role in ensuring that wheelchairs, especially battery-powered wheelchairs, remain safely in place when stowed in the aircraft cargo compartment. During this discussion, the Subcommittee heard from a number of experts, including wheelchair manufacturers, a researcher of securement and design of wheelchairs, airplane manufacturers and an industry trade association.

Airplane manufacturers, the researcher and the trade association described which new and old aircraft have securement points, challenges in transporting wheelchairs by air, and a guide on best and worst practices for transporting wheelchairs by air. The recommendations for airplane manufacturers and airlines are built off the detailed information provided to the Subcommittee.

Wheelchair manufacturers indicated that while almost all new battery-powered wheelchairs are equipped with transit tie-downs for securement, these transit tie-downs used for transportation in an automobile are not specifically designed nor tested to any standard related to air travel. The most

rigorous automobile testing standard — WC-19 (Note: scooters likely do not meet the WC-19 requirements) — is likely more than what should be necessary for adequate strapping in the cargo compartment of an aircraft. However, adequate securement points that meet the WC-19 standards are expensive and are optional, so they are not always purchased by passengers who use a wheelchair. Wheelchair manufacturers asserted that securement points should not be made mandatory — and should be left as an optional feature because they can add cost that is often not covered by insurance and can add weight, particularly on lightweight manual wheelchairs. A recommended best practice for wheelchair manufacturers regarding securement points adopts a pragmatic approach that reflects the benefits of securement points and the challenges of a strict mandate.

As some mobility aids, such as scooters, do not typically have securement tie-downs or brackets and likely do not meet the stricter requirements for WC-19, the recommendation recognizes the need for RESNA or ISO to develop technical requirements for securement in air travel, and device manufacturers can design new options specifically for scooters for air travel.

5. The Committee recommends that each large U.S. airline review its mishandled (damaged, delayed or lost) wheelchair and scooter data, determine what component of this data relates to delayed wheelchairs and scooters, review the data to determine the cause of the delay, and consider actions to take to prevent or reduce incidents of delayed return of these devices to passengers with disabilities.

Data provided to DOT related to mishandling of assistive devices does not distinguish between devices lost, damaged or delayed. Analysis by carriers on the mishandling of devices — particularly with respect to determining delays versus damage to devices — could be very valuable in determining any underlying issues. The Subcommittee did not have enough information to determine whether carriers are currently conducting this type of analysis. Benefits to the customer from more granular data could be determined by airlines conducting an internal analysis and using potential findings to consider and implement solutions to reduce or eliminate delays upon customer arrivals. The Committee unanimously approved this recommendation.

6. The Committee recommends that a working group, led by IATA, be established to study how battery-powered wheelchairs and scooters could best fit and be secured within the bulk cargo compartment of both narrow-bodied aircraft and wide-bodied aircraft. The study's purpose is to explore innovative improvements, including the design of aircraft bulk cargo compartments (e.g., bulk cargo doors) and battery-powered wheelchairs and scooters. At a minimum, study participants should include representatives from both aircraft manufacturers and device manufacturers. This work should be carried out in coordination with RESNA, where possible.

Battery-powered mobility aids and scooters are considered dangerous goods when carried by air because the inadvertent operation of electric mobility aids can cause friction or electrical load, leading to fire. They can be transported safely by air transport, provided certain safety requirements and regulations are met. Airlines secure mobility aids against movement in the cargo compartment by using straps, tie-downs or other restraint devices.

Transit tie-down and securement points, in cargo compartments, in unit load devices (ULDs) and on battery-powered wheelchairs and scooters, could help to reduce the risk of damage to an assistive device when stowed during air travel. Such safety options, however, are not standard features on all aircraft types, especially older aircraft models. Tie-down points are also not standard on all ULDs.

Furthermore, while most new battery-powered wheelchairs delivered today are equipped with tie-down and securement points as a standard feature, this is not the case for older models or for many manual wheelchairs or scooters. Additionally, wheelchairs and scooters are not specially designed and tested for the purpose of stowage during air travel.

The Committee discussed in detail how to address the issue of loading and securing the battery-powered mobility aids in the cargo hold. Committee members recommended that IATA launch a working group to examine whether the aircraft could be designed differently to better accommodate assistive devices in the bulk cargo compartment. Wheelchair and scooter design changes should also be considered. The working group should identify short-term and long-term solutions such as examining aircraft cargo door and compartment design.

Assistance at Airports and on Aircraft and Related Training

1. The Committee recommends that, as a general matter, DOT continue to use the totality of the circumstances standard to determine if enplaning, deplaning and connecting assistance is prompt. The Committee recommends that DOT impose a new requirement that airlines notify passengers when assistance cannot be provided within a certain time frame to be defined by DOT. The Committee also recommends that DOT codify the timeliness standard described in the Preamble of the 2008 final rule with respect to providing deplaning assistance by aisle chair (i.e., aisle chair and personnel be at the arrival gate no later than as soon as other passengers have deplaned).

Boarding, deplaning and connecting assistance is to be provided promptly when requested by a passenger with a disability who requires this service. DOT determines whether such assistance is prompt by looking at the totality of the circumstances due to various factors — including airport design — that may result in assistance delays. With regard to aisle chair assistance, DOT generally relies on language from a 2008 final rule, which states “that personnel and boarding chairs should be available to deplane the passenger no later than as soon as other passengers have left the aircraft.” This language is not in the regulation.

Discussion in the Assistance Subcommittee centered around the promptness of aisle chair assistance. Representatives of veterans and disability organizations provided examples of passengers with disabilities who failed to receive prompt assistance in deplaning. As a result, these representatives sought to tighten the promptness standard for aisle chair assistance. Although a majority of Subcommittee members (4-3) supported this recommendation, it was not adopted because it failed to reach the consensus threshold. A majority of Subcommittee members subsequently agreed to a recommendation that DOT generally “continue to use the totality of the circumstances standard rather than a specific time frame to determine if enplaning, deplaning and connecting assistance is prompt.”

Committee members engaged in a robust discussion of the Subcommittee’s recommendation, raising many of the same concerns that were discussed by the Subcommittee. Specifically, airline representatives and an airport representative noted their preference for totality of the circumstances based on several factors, including the layout of the airport, the number of ad hoc requests and the effects of irregular operations. Disability and veterans community representatives raised concerns that totality of the circumstances provided no assurance for the passenger as to when assistance would or should be provided.

An airport representative suggested providing notification of delays in assistance instead of establishing a timeframe for it to be provided. A vendor representative noted that airlines do not provide them with passengers' contact information, and an airline representative noted that they do not have this information for passengers who book through third parties. An airport representative suggested that airlines collect phone numbers for passengers who request assistance, and a disability community representative indicated support for this suggestion. A veteran's community representative noted a preference for a timeframe and delay notifications.

Following a series of votes, a majority of Committee members voted in favor of the amended recommendation, which included DOT codifying the timeliness standard described in the 2008 final rule with respect to providing deplaning assistance by aisle chair and recommending imposing a notification requirement. A majority voted to reject including language that would recommend a specific parameter for timeliness.

2. The Committee recommends that DOT swiftly issue its rulemaking clarifying that the requirement to provide prompt assistance includes assistance moving within airport when requested by or on behalf of a passenger with a disability with a departing, arriving or connecting flight.

The ACAA prohibits discrimination on the basis of disability in air transportation by U.S. and foreign air carriers. The ACAA's regulation — 14 CFR Part 382 — outlines airlines' responsibility to provide, upon request, timely and effective assistance to passengers with disabilities at airports and on aircraft. The assistance includes enplaning and deplaning; moving from the terminal entrance or a drop-off point adjacent to the entrance through all key functional areas of the terminal to the gate for departure; transferring passengers between gates to successfully connect to another flight; and escorting passengers to access the baggage claim areas and then to the terminal entrance or a pickup point adjacent to the entrance. DOT has consistently interpreted that the assistance required by this regulation must be "prompt." To further clarify this interpretation and to avoid any confusion among carriers or passengers, DOT has initiated a rulemaking regarding the provision of prompt assistance at airports.

One airline representative on the Assistance Subcommittee expressed hesitation about supporting a regulatory amendment to clarify when prompt assistance is required for assisting passengers in moving within an airport, given 1.) that the Subcommittee did not have the regulatory analysis or language of the proposed DOT rule and 2.) there are complicating factors that should be addressed in a DOT rulemaking, such as the number of ad hoc requests for assistance that airlines receive. And one airport representative on the Subcommittee noted that situations beyond airlines' control may prevent them from providing prompt assistance to passengers moving within airports.

It was noted that airlines are committed to providing accommodations to passengers with disabilities, including assistance moving within an airport. Since "prompt" appears in DOT regulations concerning enplaning and deplaning assistance — but does not appear in the separate and distinct DOT regulation on airport assistance — there is some question as to whether prompt applies to assistance moving within the airport. DOT's position by interpretation is that prompt enplaning and deplaning assistance does include moving within the airport.

In general, representatives of the disability and veterans communities on the Subcommittee favored a regulation requiring airlines to provide prompt assistance throughout a passenger's journey. One representative noted that prompt assistance is particularly important during layovers because

passengers with disabilities face more challenges to get to their gates on time for their connecting flights.

A majority of Committee members recommended that DOT move quickly on a rulemaking to clarify the requirement that prompt assistance includes assistance moving within the airport terminals for departure, arrival and connecting.

3. The Committee recommends that Airports Council International – North America (ACI-NA) and Airlines for America (A4A) work together, in consultation with disability rights advocates, to develop guidelines and best practices for assisting passengers with disabilities with self-identification upon arrival for travel from U.S. airports or connecting at U.S. airports as applicable, including the use of personnel, physical infrastructure and available technologies. For example, the working group would address how individuals with different types of disabilities, including those who are blind or of low vision, would know how to self-identify when entering an airport terminal. The Committee recommends that the working group consider the best practices identified in the *FAA Advisory Circular 150/5360-12F: Airport Signing and Graphics* and *Airport Cooperative Research Program, Report 210: Innovative Solutions to Facilitate Accessibility for Airport Travelers with Disabilities*. The Committee also recommends that the working group examine how assistive technologies can improve access at airports, including the use of such apps as Aira, which is a service that connects blind and low-vision people to highly trained, remotely located agents through an app on a phone.

Airports, airlines and their vendors provide accommodations such as wheelchair or guide assistance to passengers with disabilities at U.S. airports. Passengers must identify themselves as needing assistance upon arrival to the airport, at any connection points and upon arrival to their destination because airlines have no means to identify passengers who require assistance at an airport.

Every airport is different and is developed to best serve the local and traveling population. Airports vary due to many factors such as location, access to public transportation, access to local infrastructure and the airport's governing structure. Airports have developed various solutions for passengers to self-identify at an airport based on many factors, including those listed above. Airports and airlines work together to provide information on accommodating passengers with disabilities, including how and where to self-identify at airports. The Subcommittee heard from disability groups that maintained self-identification can be a challenge despite airport and airline efforts.

The Committee discussed ways to facilitate self-identification and seamless assistance at airports, and found that improvements in personnel, infrastructure and technology can assist passenger self-identification. Examples of infrastructure at certain airports that aid self-identification were shared, such as at the Sacramento International Airport in California, where telephones in the shuttle, parking and car rental areas allow passengers with disabilities to connect with airlines and receive assistance prior to arriving at the airport terminal entrance. Additionally, at the Sapporo Airport in Japan, booths in the airport terminal provide passengers who are deaf with the ability to receive assistance from professional sign language interpreters. The Committee debated whether to recommend that airports install such infrastructure to facilitate self-identification and seamless assistance, but ultimately determined that airports and airlines needed the flexibility to design communications systems that work for them. Given this need for flexibility, the Committee unanimously recommended that ACI-NA and A4A work together, in consultation with disability advocates, to facilitate self-identification.

4. The Committee recommends that airlines, DOT and disability rights organizations continue educating consumers about the benefits of providing advance notice to airlines if they need enplaning, deplaning or connecting assistance.

At U.S. airports, airlines — which are ultimately responsible for providing the assistance required by the ACAA’s regulation (14 CFR Part 382) — typically contract with outside companies (vendors) for wheelchair and guide service. Recognizing that passengers with disabilities, like other passengers, sometimes need to travel on short notice for business or personal reasons, a carrier cannot require an individual with a disability wanting enplaning, deplaning or connecting assistance to provide advance notice as a condition of receiving transportation or the required services and accommodations.

While recognizing that advance notice in theory would assist airlines and vendors in better planning and preparing to assist passengers with disabilities, disability organization representatives on the Assistance Subcommittee contended that, in practice, some passengers continue to experience poor service despite providing advance notice. Conversely, airline and vendor representatives on the Subcommittee reported that one of the causes of untimely assistance is that some passengers with disabilities do not make requests for assistance in advance.

Although individual airlines and their vendors may collect certain data on service requests, DOT does not require airlines to report data on the number of assistance requests they receive, nor the percentage of assistance requests that are made in advance of passengers’ travel.

Subcommittee members generally agreed that accurate data on assistance requests and advance notice versus ad hoc requests would be helpful to shed light on whether and how increasing advance notice would improve timeliness of assistance. Airlines and their vendors believe that they would be better able to have sufficient numbers of personnel and equipment available to meet passenger demand if a greater percentage of passengers request wheelchair or guide assistance in advance of arriving at airports.

The Subcommittee outlined potential ways to get more passengers with disabilities to provide advance notice, such as a passenger education campaign by airlines — including online forms that can be used to request wheelchair and guide assistance — and incentives for providing advance notice.

The Committee unanimously recommended that passengers with disabilities should be encouraged to request assistance in advance, whenever possible.

5. As an industry best practice, the Committee encourages all U.S. commercial service airports to establish disability councils that consist of airport staff, airline representatives, disability advocates and other stakeholders to address issues related to access for passengers with disabilities.

During the Subcommittee’s discussion of passenger self-identification at airports, an airport with an established disability committee was cited as a positive example for facilitating self-identification. The purpose of this airport’s disability committee — which consists of representatives from the airport, airlines, stakeholders operating at the airport such as the Transportation Security Administration (TSA) and Custom and Border Patrol (CBP) and the disability community— is to address issues affecting passengers with disabilities at the airport.

According to an airline representative on the Subcommittee, carriers operating at the airport report that the disability committee effectively brings stakeholders together to address issues in a coordinated manner. The Subcommittee's airport representatives identified similar programs at other domestic and foreign airports. The Subcommittee recognized the value that an airport disability council could add to the resolution of issues affecting passengers with disabilities, including difficulties related to self-identification. Consequently, the Committee unanimously decided to encourage the establishment of such disability councils as a best practice at U.S. airports.

6. The Committee recommends that DOT make clear on its website who is and is not entitled to wheelchair assistance under its ACAA regulation and supports DOT issuing guidance using the text drafted by the Subcommittee (see Appendix IV for the Report on Assistance at Airports and on Aircraft and Related Training).

Under the Department regulation implementing the ACAA, U.S. and foreign air carriers are required to ensure prompt enplaning and deplaning assistance upon the request of a passenger with a disability. Such prompt assistance should include moving from the terminal entrance or a drop-off point adjacent to the entrance through all key functional areas of the terminal to the airport gate for departure, transferring passengers between gates to successfully connect to another flight, and escorting passengers to access the baggage claim areas and then back to the terminal entrance or a pickup point adjacent to the entrance.

In a growing number of cases, requests for wheelchair assistance are being made by non-disabled passengers. This impacts the timeliness of assistance provided to passengers with disabilities. According to a study conducted by IATA, some passengers request wheelchair assistance due to language barriers and other navigational challenges not related to a disability.

IATA presented several recommendations for actions that airlines, airports and the Department can take to reduce the number of inappropriate assistance requests.

The following recommendations were endorsed by the Committee:

The first IATA recommendation states that the Department could include information on available accessibility services on its website (e.g., identify who is — and who is not — eligible for wheelchair assistance). According to the recommendation, the Department's aviation consumer protection website should make clear which passengers are qualified under the ACAA regulation to receive accessibility services, with emphasis on which passengers are entitled to wheelchair assistance. Committee members also wanted the website to address the fact that wheelchair assistance is intended for passengers with disabilities who have impaired mobility and is not intended to be used by passengers without disabilities who need navigation or language assistance, help with their luggage or help moving through security quickly.

The second IATA recommendation states that the Department could issue guidance material to support the curbing of wheelchair misuse. To assist in carrying out this recommendation, the Subcommittee drafted guidance in question-answer format regarding actions airlines may take when there is a reasonable doubt that a passenger who requested wheelchair assistance needs that assistance due to a disability. [The draft guidance is included in the [Report on Assistance at Airports and on Aircraft and Related Training](#) in Appendix IV.]

The guidance defines who is qualified to receive accessibility services under the ACAA, as well as who is qualified to receive wheelchair assistance. It notes that when an airline doubts a passenger's need for wheelchair service, it may request a credible verbal assurance that the passenger needs the service and how the service assists the passenger's disability. It instructs that an airline is not required to provide wheelchair assistance to a passenger who does not have a disability. Finally, it advises an airline that it is not required to provide wheelchair assistance to a passenger with a disability if the disability is not related to mobility, but that it may offer assistance that would better accommodate the passenger's disability. [The draft questions are included in the [Report on Assistance at Airports and on Aircraft and Related Training](#) in Appendix IV.]

7. The Committee recommends that organizations representing persons with disabilities in the United States, led by Paralyzed Veterans of America (PVA), develop an inclusive list of organizations representing persons with physical, sensory, mental and intellectual disabilities. U.S. airlines may use this list as a reference guide for assistance on airline disability training programs, airline policies related to travel by passengers with disabilities or accommodation needs of an individual with a disability to the extent that it relates to systemic issues.

Although many U.S. airlines have disability advisory councils to provide guidance on disability-related training and policies effecting passengers with disabilities, airline representatives on the Assistance Subcommittee expressed interest in being able to connect with a broader segment of the disability community to ensure that they are best meeting the needs of passengers with physical, sensory, mental and intellectual disabilities. The Assistance Subcommittee agreed that providing airlines with a list of disability and veterans organizations at the national, regional and local levels would offer airlines more opportunities to connect with relevant stakeholders who may be directly impacted by a particular policy or be able to provide critical guidance on proper training procedures.

The Subcommittee member representing PVA agreed to lead the development of this list. PVA has been involved in advocating for access to air travel for people with disabilities — including wheelchair users — for nearly four decades and regularly coordinates with the broader veterans and disabilities communities on air travel.

The Committee unanimously supported this recommendation. In line with the discussions of several Committee members representing the disability community, PVA agreed that the list will include not only organizations representing a variety of disabilities, but also service dog organizations and those that are led directly by people with disabilities.

8. As an industry best practice, the Committee recommends that airlines consult with disability rights organizations if changing or enhancing their disability training program. This would ensure that the changes or enhancements result in safe, adequate and dignified assistance being provided to persons with disabilities. In carrying out this recommendation, the Committee encourages airlines and disability rights organizations to enter into agreements that include a process for airlines to provide feedback to the organizations on whether the organizations' suggestions were adopted and, if known, whether the actions taken improved the air travel environment.

Carriers are required to consult with organizations representing persons with disabilities within the U.S. when developing a training program, policies and procedures. However, DOT regulations do not require airlines to consult with disability organizations when making changes to existing training programs. While many airlines have disability advisory committees that may review proposed changes, their

membership may or may not include members of disability communities that would be affected by them.

Although airlines and vendors in general have included disability awareness and sensitivity components in their training programs — and dignity-related complaints are not among the top categories of complaints received by DOT — members representing disability and veterans organizations on the Assistance Subcommittee shared that some passengers with disabilities report facing challenges during air travel with respect to receiving assistance that adequately safeguards their privacy and dignity.

The Subcommittee found that the failure of airline or vendor employees to communicate effectively and appropriately with people with disabilities has at times led to individuals who are blind or low vision receiving wheelchair assistance instead of guide assistance. One Subcommittee member cited best practices for guide assistance, which include “never asking a person who is blind to sit in a wheelchair” and “providing training to airline employees and contractors on disability/blind etiquette (e.g., offering an arm for escort).”

Some airlines have established boards composed of individuals with different disabilities to provide recommendations on steps the airlines can take to improve access at airports and on aircraft. The airline and vendor representatives on the Subcommittee indicated that airlines and vendors want to provide appropriate and dignified assistance to passengers with disabilities.

The Committee unanimously recommended that, as an industry best practice, airlines should consult with disability organizations if changing or enhancing their disability training program. Airlines are also encouraged to enter into agreements to provide feedback to disability organizations on whether the organizations’ suggestions were adopted and, if known, whether the action taken improved the air travel experience. It was also noted that the provisions of the best practice recommendation would supplement — and not replace — existing airline advisory boards.

9. As an industry best practice, the Committee recommends airlines provide advance notice — to one or more disability rights organizations representing the affected communities — of new major airline policies or modifications to existing airline policies that would impact air travelers with disabilities.

When airlines announce new airline policies or make modifications to existing disability-specific or general customer policies that disproportionately affect passengers with disabilities, it can lead to confusion for the travelers and the organizations that assist them. Although airlines are not required to consult with or inform disability organizations about new policies or changes to existing policies, the Assistance Subcommittee supported a recommendation for airlines to provide advanced notice to disability organizations under these circumstances.

The opportunity for advanced notice not only allows organizations to alert their members to new changes that may affect their travel, but it also gives those organizations an opportunity to ask questions that may spur the need for further consideration of the policy or highlight areas that need to be clearly communicated to passengers requesting certain accommodations. It also encourages airlines to reach out to organizations representing segments of the disability community that may not be represented on existing airline disability advisory boards.

When the Committee considered this recommendation, an airline representative expressed the need for airlines to have discretion regarding the types of policies subject to the proposed best practice.

Following further discussion, the Committee agreed that it would be beneficial for airlines to provide advanced notice of policy changes or modifications deemed to be “major” to organizations representing members of the relevant segments of the disability community. The Committee unanimously approved the amended recommendation.

10. The Committee recommended that DOT’s Office of the Secretary and FAA take the lead, in consultation with the Access Board, in conducting a study on the design of aisle chairs and the use of lift devices such as the Eagle Lift to improve the process of aisle transfers for passengers who use wheelchairs and, in that process, consider how these devices may impact the safety of individuals who provide physical assistance.

During presentations to the Committee, veterans and disability organizations raised concerns about the safety of existing aisle chairs, which are necessary for passengers with limited mobility to board and deplane a commercial aircraft. The Assistance Subcommittee determined that aisle chair transfers could be made safer if improvements were made to the design of aisle chairs and discussed aisle chair alternatives that may provide a better way to transfer passengers with mobility disabilities from their wheelchairs to aircraft passengers’ seats. The recommendation did not assign responsibility for the study.

Following a discussion of the Subcommittee’s recommendation by the Committee, members unanimously recommended that DOT and FAA lead a study, in consultation with the Access Board, about the design of aisle chairs and use of lift devices, such as the [Eagle Lift](#). The goal of the study is to gather important data that could improve the transfer process for passengers who use wheelchairs. The Committee believes that FAA should be involved in the study due to its responsibility for ensuring the safety of all passengers and because of its knowledge of aircraft design and safety requirements. The Access Board should be involved because DOT and other agencies rely on the Board for design specification expertise. The study could result in aisle chair specifications, given that part of it will be to study aisle chair design and study participants would need to determine next steps to be taken at the completion of the study.

11. The Committee recognizes the importance of the study being conducted by the U.S. Access Board to: (a) assess the feasibility of equipping aircraft with restraint systems, and (b) determine, if feasible, the ways in which individuals with significant disabilities using wheelchairs, including power wheelchairs, can be accommodated with in-cabin wheelchair restraint systems. The Committee recommends that the study be completed in a prompt manner if it has not yet completed the study by the date of the Committee’s report.

Some passengers who use wheelchairs, particularly those who use power wheelchairs, would like to have the option to fly while seated in their customized devices. For some wheelchair users, this option would allow a more dignified travel experience by avoiding the aisle chair otherwise needed to transfer into a passenger seat. It would also allow them to possibly decrease the risk of damage to their mobility device. For other wheelchair users who are unable to sit in a traditional passenger airline seat because they require their customized wheelchair for their health and rehabilitation, it would allow them to travel by air.

The Assistance Subcommittee considered that it may be safer and more dignified for passengers to travel on aircraft in their own wheelchairs. Since the Subcommittee did not know whether it is feasible for passengers to travel in their own wheelchairs, they decided to recognize the importance of a study

sponsored by the Access Board and conducted in collaboration with the Transportation Research Board (TRB) on the feasibility of wheelchair restraint systems and to encourage the study be completed in a prompt manner. Despite concerns that the recommendation might not ultimately be timely, it was unanimously adopted by the Committee on September 9, 2021.

Following the Committee's meeting, TRB released the study on September 15, 2021, entitled, "[Technical Feasibility of a Wheelchair Securement Concept for Airline Travel: A Preliminary Assessment](#)." The TRB study was unable to "identify any issues ... that seem likely to present design and engineering challenges so formidable that they call into question the technical feasibility of an in-cabin wheelchair securement system and the value of exploring the concept further." The study acknowledged that further assessment was needed, however, "particularly to understand how secured personal wheelchairs are likely to perform relative to FAA's security criteria in restraining and protecting occupants during a survivable airplane crash or emergency landing," and called on DOT and FAA to undertake research on these issues. The TRB also called on the Access Board to assess demand from people with disabilities to fly while seated in their wheelchairs to inform the number of aircraft that would need to be modified to provide meaningful access, assuming remaining feasibility questions are satisfied.

12. Recognition of Individuals Providing Wheelchair and Guide Assistance: The Committee recommends that, as a best practice, airlines and vendors recognize employees who excel in assisting passengers with disabilities, based on, among other things, feedback from passengers with disabilities. Accessible formats should be used to obtain feedback from passengers with disabilities. The Committee also recommends that airlines and vendors consider further motivating these employees by providing monetary awards as recognition of outstanding performance or providing job growth opportunities where the employees receive greater responsibility along with an increase in compensation and training. For example, an employee could be given responsibility for lifting passengers on and off an aircraft seat instead of — or in addition to — pushing passengers in wheelchairs along with enhanced training and greater compensation.

Although complaints alleging disability assistance that jeopardizes passengers' safety are not common, these types of incidents, when they occur, can cause serious harm to passengers. Successful assistance is dependent on sufficiently trained personnel with adequate strength, skill and equipment.

The Assistance Subcommittee looked at whether providing incentives for attendants could lead to higher quality services and, if so, what the incentives should be.

The Subcommittee member from Prospect Airport Services maintained that improved service can be incentivized and described how her organization uses passenger feedback, in part, to identify employees who perform their jobs particularly well. Prospect recognizes these employees by naming them "employee of the month" and rewarding them with gift cards and other items with monetary value. She asserted that these measures are effective in motivating employees to provide service to passengers above and beyond what is required.

Some Subcommittee members noted that, because attendants typically receive moderate pay, providing them with monetary incentives may not only improve the quality of service they provide, but also reduce the high rate of employee turnover. Other Subcommittee members had reservations about providing monetary incentives, saying they favored rewarding high performers with opportunities for more responsibility, which necessitates higher pay.

Given disagreement regarding monetary incentives, the Subcommittee decided to recommend, as a best practice, that airlines and vendors recognize employees who provide exceptional service to passengers with disabilities. Suggested incentives include monetary awards and the opportunity to receive higher-level training for greater responsibility and commensurate compensation.

The Subcommittee also discussed ways for airlines and vendors to identify employees who provide exceptional service. Some members expressed reservations about using passenger feedback at the conclusion of the service as a tool to identify good performance because of the concern that passengers may feel pressured to provide positive feedback if the service providers are watching them fill out the survey. Subcommittee members agreed that any method airlines and vendors use to collect passenger feedback should be accessible.

The Committee unanimously recommended that airlines and vendors recognize employees who excel in assisting passengers with disabilities, with the provision that airlines provide disability organizations with feedback on the recommendations they make about how to identify employees who provide excellent service.

13. The Committee recommends that, as best practices, airlines provide hands-on training as appropriate for airline or contractor personnel who handle battery-powered wheelchairs or scooters; hands-on training be provided as appropriate to airline personnel or contractors who provide physical assistance to passengers with disabilities; and airlines involve individuals with disabilities, whether it is through their advisory board or external organizations, in their training programs.

Veterans and disability organizations report that some passengers with disabilities who must board and deplane aircraft using aisle chairs often experience inconsistent and at times unsafe and undignified treatment during this process. Although the ACAA regulations do not require it, many airlines responding to a survey conducted as part of the work of the Committee reported that they provide hands-on training to their employees who provide this type of assistance. Vendors providing this service on behalf of airlines were not surveyed about this type of training.

The Assistance Subcommittee agreed that providing assistance personnel with “frequent, practical training would reduce the incidence of injury to passengers with mobility impairments.” The Subcommittee considered a recommendation that would require hands-on training for those personnel who provide aisle chair transfer assistance and for annual refresher training. This recommendation failed 5-2 and no recommendation was moved forward to the full Committee.

During Committee discussions, members expressed a desire to further discuss the issue of training, despite the lack of a Subcommittee recommendation. Committee members raised issues related to difficulties in training employees on wheelchair stowage due to the wide variety of aircraft and wheelchairs, as well as the need to work with disability organizations on in-person training. Airlines noted that some issues are more about communication or awareness versus training and that some already work with disability organizations as part of their training programs.

Ultimately, a majority of Committee members recommended that, as a best practice, airlines should provide hands-on training as appropriate for airline or vendor personnel who handle battery-powered wheelchairs or scooters and provide physical assistance to passengers with disabilities. Furthermore, airlines should involve individuals with disabilities in their training programs.

APPENDIX

I. List of Committee Members

1. **Michelle Albert**, Boeing Commercial Airplanes, representing aircraft manufacturers
2. **Zainab Alkebsi**, National Association of the Deaf, representing national disability organizations
3. **Heather Ansley**, Paralyzed Veterans of America, representing national veterans' organizations representing disabled veterans
4. **Dana Folsom**, Delta Air Lines, representing air carriers
5. **Mark Greig**, Sunrise Medical, representing wheelchair manufacturers
6. **E. Keith Hansen**, Allegiant Air, representing air carriers
7. **Doug Lavin**, International Air Transport Association, representing air carriers
8. **Nicholas LiBassi**, United Spinal Association, representing national disability organizations
9. **Paige Mazzoni**, Canine Companions for Independence, representing national disability organizations
10. **Paul Melmeyer**, Muscular Dystrophy Association, representing national disability organizations
11. **Doug Mullen**, Airlines for America, representing air carriers
12. **Pablo Nüesch**, Airports Council International – North America, representing airport operators
13. **Clark Rachfal**, American Council of the Blind, representing national disability organizations
14. **Ramakant Rambhatla**, Invacare Corporation, representing wheelchair manufacturers
15. **Gregory Reed**, Disabled American Veterans, representing national veterans' organizations representing disabled veterans
16. **Lawrence Rolon**, Ontario International Airport, representing airport operators
17. **James Sinocchi**, Chair, representing passengers with disabilities
18. **Claire Stanley**, National Disability Rights Network, representing national disability organizations
19. **Jo Ann Storie**, Prospect Airport Services, representing contract service providers

II. Subcommittee Members

Ticketing Practices and Seating Assignments

1. **Jim Sinocchi**, ACAA Advisory Committee Chair and representative of passengers with disabilities
2. **Zainab Alkebsi**, National Association of the Deaf, as representative of national disability organizations
3. **Doug Lavin**, International Air Transport Association, as representative of airlines
4. **Paige Mazzoni**, Canine Companions for Independence, as representative of national disability organizations
5. **Gregory Reed**, Disabled American Veterans, as representative of national veterans' organizations representing disabled veterans
6. **Kenneth Shiotani**, National Disability Rights Network, as representative of national organizations
7. **Dallas Thomas**, Southwest Airlines, as representative of airlines
8. **Blane Workie**, DOT, Designated Federal Officer

Stowage of Assistive Devices

1. **Jim Sinocchi**, ACAA Advisory Committee Chair and representative of passengers with disabilities
2. **Michelle Albert**, Boeing Company, as representative of aircraft manufacturers
3. **Dana Folsom**, Delta Air Lines, as representative of airlines
4. **Mark Greig**, Sunrise Medical, as representative of wheelchair manufacturers
5. **Keith Hansen**, Allegiant Air, as representative of airlines
6. **Nicholas LiBassi**, United Spinal Association, as representative of national disability organizations
7. **Ramakant Rambhatla**, Invacare Corporation, as representative of wheelchair manufacturers
8. **Kristin Stephenson**, formerly with Muscular Dystrophy Association, as representative of national disability organizations
9. **Blane Workie**, DOT, Designated Federal Officer

Assistance at Airports and on Aircraft and Related Training

1. **Jim Sinocchi**, ACAA Advisory Committee Chair and representative of passengers with disabilities
2. **Heather Ansley**, Paralyzed Veterans of America (PVA), as representative of national veterans organizations representing disabled veterans
3. **Doug Mullen**, Airlines for America (A4A), as representative of airlines
4. **Pablo Nüesch**, Airports Council International – North America (ACI-NA), as representative of airport operators
5. **Lawrence Rolon**, formerly with the Los Angeles World Airports (LAWA), as representative of airport operators
6. **Claire Stanley**, formerly with the American Council for the Blind (ACB), as representative of national disability organizations
7. **Jo Ann Storie**, Prospect Airport Services (Prospect), as representative of contractor service providers
8. **Blane Workie**, DOT, Designated Federal Officer

III. List of Acronyms Cited in this Report

Full names are cited on first reference; acronyms are used on subsequent references as needed:

A4A-IATA Reservations Interline Message Procedures (AIRIMP)

Advanced Notice of Proposed Rulemaking (ANPRM)

Air Carrier Access Act (ACAA)

Airlines for America (A4A)

Airports Council International – North America (ACI-NA)

American National Standards Institute (ANSI)

Assistive Technology for Air Travel (ATAT)

Custom and Border Patrol (CBP)

Department of Transportation (DOT)

Federal Aviation Administration (FAA)

Food & Drug Administration (FDA)

International Air Transport Association (IATA)

International Organization for Standardization (ISO)

Notice of Proposed Rulemaking (NPRM)

Paralyzed Veterans of America (PVA)

Rehabilitation Engineering and Assistive Technology Society of North America (RESNA)

Special Service Request (SSR)

Transportation Research Board (TRB)

Transportation Security Administration (TSA)

Unit Load Device (ULD)

IV. Subcommittee Reports, Meeting Summaries, Committee Charter, Bill of Rights

Air Carrier Access Act Advisory Committee Subcommittee Reports

1. **Report of the Subcommittee on Ticketing Practices and Seating Accommodation** [\[Download PDF\]](#)
2. **Report of the Subcommittee on Stowage of Assistive Devices** [\[Download PDF\]](#)
3. **Report on Assistance at Airports and on Aircraft and Related Training** [\[Download PDF\]](#)

Air Carrier Access Act Advisory Committee Meeting Summaries

1. **Summary of the First Meeting:** March 10 and 11, 2021, Washington, D.C. [\[Download PDF\]](#)
2. **Summary of the Second Meeting:** September 2, 8 and 9, 2021, Virtual Sessions [\[Download PDF\]](#)

Air Carrier Access Act Advisory Committee Charter

1. **Charter of the Air Carrier Access Act Advisory Committee, U.S. Department of Transportation:**
Filed on September 20, 2019 [\[Download PDF\]](#)

Airline Passengers with Disabilities Bill of Rights Documents

1. **Working Draft**, September 10, 2021 [\[Download PDF\]](#)