

Assistance at Airports and on Aircraft and Related Airline Training Programs



Current Regulations and Programs Review



The FAA Reauthorization Act of 2018

Section 440(a)(1)

DOT shall:

- **review**, and if necessary **revise**, applicable regulations
- to ensure that passengers with disabilities who request assistance while traveling in air transportation receive **dignified, timely**, and **effective** assistance at airports and on aircraft from trained personnel
- The assistance referred to in subsection (a)(1) may include requests for assistance in **boarding or deplaning** an aircraft, requests for assistance in **connecting** between flights, and other similar or related requests, as appropriate.

Assistance at Airports

Key Provisions

- Assistance from the curb/terminal entrance to the departure gate
- Assistance from arrival gate to baggage claim/terminal exit/connecting gate
- Assistance entering/exiting aircraft
- Assistance transporting carry-on
- Assistance must be prompt

14 CFR 382.91 & 382.95



Assistance Onboard the Aircraft



Key Provisions

- Stow and retrieve assistive devices and other carry-on baggage upon request and self-identification
- Provide on-board wheelchair upon request on aircraft with more than 60 seats
- Assistance in moving to and from seats

14 CFR 382.111

Training Requirements

14 CFR Part 382 requires carriers to train their personnel and contractors.

Training differs depending on whether the employee is a:

- Complaints Resolution Official (CRO)
- Other Public Contact Employee or Contractors



What training are carriers required to provide for their personnel?

Content of Training

training to proficiency on:

- Part 382
- carrier's procedures, including how to safely and properly operate equipment
- use of boarding and deplaning equipment
- awareness training



Recurrent Training

14 CFR 382.141(a)(1)

Challenges in Providing and Receiving Wheelchair Assistance

A DOT Perspective



DOT Disability Complaint Process and Database

60

Table 2 (YTD)

AIR TRAVEL CONSUMER REPORT						
COMPLAINT CATEGORIES*						
COMPLAINT CATEGORY	JANUARY - DECEMBER 2019			JANUARY - DECEMBER 2018		
	RANKING	COMPLAINTS**	SUB-CATEGORY	RANKING	COMPLAINTS**	SUB-CATEGORY
FLIGHT PROBLEMS	1	4,756		1	4,517	
CANCELLATION			1,911			1,882
DELAY			1,582			1,537
MISCONNECTION			706			648
BAGGAGE	2	2,565		2	2,728	
RESERVATIONS/TICKETING/BOARDING	3	1,823		3	1,908	
CUSTOMER SERVICE	4	1,703		4	1,618	
REFUNDS	5	1,568		5	1,329	
FARES	6	1,033		6	1,542	
DISABILITY	7	905		7	827	
OTHER	8	433		8	510	
FREQUENT FLYER			169			237
OVERSALES	9	376		9	409	
DISCRIMINATION	10	107		10	97	
ADVERTISING	11	61		11	57	
ANIMALS	12	2		12	2	
COMPLAINT TOTAL		15,332			15,544	

* A DETAILED EXPLANATION OF THE COMPLAINT CATEGORIES IS ATTACHED.

** INCLUDES FIGURES FOR SUB-CATEGORIES.

Disability- Related Complaint Reports Filed by Carriers to DOT

- Required by 14 CFR 382.157
- DOT publishes the annual report on its website:
<https://www.transportation.gov/airconsumer/annual-report-disability-related-air-travel-complaints>

A summary of the 2016 and 2017 disability complaint data is set forth in the table below.

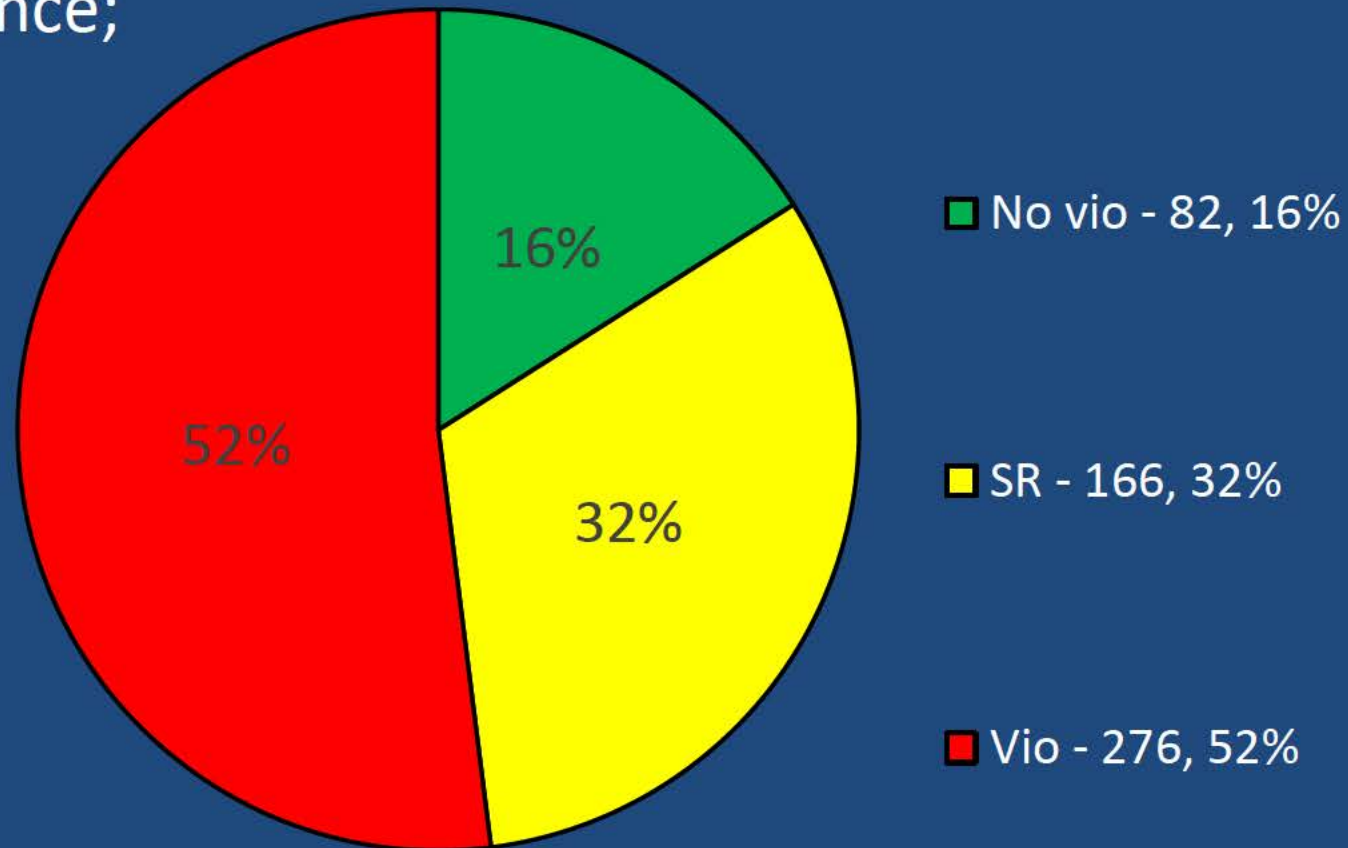
Calendar Year	Total Number of Disability Complaints Received by Domestic Carriers	Total Number of Disability Complaints Received by Foreign Carriers	Total Number of Disability Complaints Received by All Carriers	Total Enplanements
2016	27,842	4,603	32,445	931,987,799
2017	29,312	5,039	34,351	964,549,368

The Scope of Our Review

- Date range: January 1, 2017 – October 31, 2018
- Carriers:
 - Top 10 U.S. marketing carriers
 - Top 5 foreign carriers by enplanements to and from the United States
- Types of complaints:
 - Complaints that contain at least one issue regarding 382.91 or 382.95.

Let's talk about numbers!

- Total number of Complaints reviewed: 1321
 - 524 complaints (40%) involve enplaning, deplaning and connecting assistance;





Problem

Analysis

Possible Measures



Top Issues Spotted among 382.91 and 382.95 Violations

- Unsatisfied with agents
- Service provided
untimely
- Service not provided



Possible Causes of Service Failures *(As Stated by Carriers in their Responses)*

- Inadequate resources
- Inaccurate or incomplete record entries
- Logistic/system failure



Possible Measures

Possible Measures to Address These Violations

- **Improve Training**
- **Improve Procedures**
- **Improve Resource Availability and Efficiency**
- **Use of Technologies**
- **Enhance Accountability**

What We Found from the “No Violation” Complaints

- Passenger Expectations do not always align with regulatory requirements.
 - Long wait at the gate
 - Curbside
 - Wait to deplane
- Passengers with a disability unfamiliar with how to better prepare for travel :
 - SSR codes (WCHR, WCHS, WCHC)
 - Assumption of level entry
 - Tight Connection
 - Self-identification

Reducing “No Violation” Complaints

Public Outreach and Consumer Education

- Carriers’ websites and reservation agents
- **DOT Website**
<https://www.transportation.gov/individuals/aviation-consumer-protection/traveling-disability>
- **Disability advocacy groups**

A Better Prepared Passenger is More Likely a Happier Passenger!



2017 GAO Report on Airline Training Programs

GAO Review

- 12 carriers (including foreign, regional, low cost, and large network carriers)
- wheelchair assistance companies, disability advocacy groups, government agencies
- DOT passenger complaint data, investigative processes, and enforcement cases

2017 GAO Report on Airline Training Programs (continued)

Summary of Findings

Carriers

- All 12 carriers have training programs that include initial and recurrent training as required by the ACAA
- quality assurance programs
- disability boards

DOT

- 51 disability-related enforcement cases since 2005 (of which, 13 involved training-related corrective actions)

Examples of DOT Enforcement

Order 2004-08-19

- Found CRO training class to be substantially deficient (2 hours, lacked in-depth review of rules)
- Carrier later expanded class to 8 hours (including in-depth review, sensitivity training, and written test)

Order 2017-1-11

- Improper handling of service animal and related seating accommodations reflected a lapse in training
- Carrier ordered to provide supplemental training to reservations and gate agents regarding service animal requests