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## Aviation Group Client Update

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### **PASSENGERS WITH DISABILITIES: AIR CARRIERS' DISABILITY-TRAINING PROGRAMS AND THE DEPARTMENT OF TRANSPORTATION'S OVERSIGHT**

On May 31, 2017, the Government Accountability Office (GAO) [reported](#) on whether air carriers have training programs that address disability-related training requirements.

**Background.** The GAO conducted this research based on recent census data showing that 57 million Americans (roughly 1 in 5) have a disability, more than half of whom have mobility issues. The Air Carrier Access Act (ACAA), enacted in 1986, prohibits air carriers from discriminating against individuals on the basis of disability in the provision of air transportation. Subsequently, the ACAA's implementing regulations require air carriers to provide disability training to their employees and contractor staff who deal with the traveling public. Pursuant to the Federal Aviation Administration (FAA) Extension, Safety, and Security Act of 2016 which included a provision that GAO submit a report to Congress assessing required disability training programs for air carrier and contractor personnel, GAO conducted this study.

**Summary.** The GAO report discusses: (1) how selected air carriers' disability training programs vary, if at all, in addressing federal requirements and (2) how DOT oversees air carrier compliance with the ACAA and what enforcement actions DOT has taken, including corrective actions sought, regarding air carriers' training programs since 2005. GAO reviewed the training programs of 12 air carriers that account for nearly 75 percent of passenger enplanements in 2015.

**Findings.** GAO found that all 12 air carriers selected for review have training programs that address disability-related training requirements, with some variations in the specific content and format. Each air carrier, that participated in the research, indicated that it has both initial and recurring training for its employees and contractors who interface with passengers with disabilities. Additionally, the 12 air carriers demonstrated that they have annual Complaint Resolution Officer training and annual recurrent training programs, both of which are Air Carrier Access Act (ACAA) requirements.

With regards to the variations among air carrier's disability training programs, GAO found that some air carriers voluntarily implemented quality assurance programs to improve and sustain their disability training programs' performance. GAO also found that some carriers have taken additional steps, though not required by the ACAA or its implementing regulations, to create a disability board, which serves as a forum for increasing awareness among the workforce about disability issues.

Regarding the second focus of this study, GAO found that the Department of Transportation (DOT) uses a variety of oversight methods to ensure ACAA compliance by air carriers, including analyzing passenger complaint data, conducting compliance inspections, and pursuing enforcement actions. GAO also found that since 2008, DOT has pursued additional avenues for oversight including adding visits to foreign air carriers and conducting airport inspections.

If you have any questions or would like further information, please contact Shelley Ewalt.

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