

Philadelphia International Airport

Americans with Disabilities (ADA) Policy

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Purpose of This Policy

This policy provides Philadelphia International Airport ("PHL") personnel with the policies, standards, and procedures by which to implement Title II of the Americans with Disabilities Act ("ADA"), as amended, which is codified at 42 U.S.C. 12101-12213 (28 C.F.R. 35) and Section 504 of the Rehabilitation Act of 1973 ("Section 504"), P.L. 93-112, as amended, which is codified at 29 U.S.C. 794, applicable to the airport program. This Policy helps ensure standardization and uniformity in the application of these regulations.

Airport operators are required under Title II of the ADA (28 C.F.R. 35.107(a)) and Section 504 regulations (49 C.F.R. S 27.13(a)), to coordinate efforts to comply with the applicable regulations, including the investigation of complaints alleging its noncompliance with these Parts or alleging any actions that would be prohibited by these Parts.

This policy applies to all public entities related to PHL and their contractors, tenants, and licensees collectively known as "PHL Entities".

Self-Evaluations

Under 49 C.F.R. 27, PHL Entities are required to establish a system for periodically reviewing their services, policies, and practices, to evaluate their compliance with the applicable regulations, and to take any appropriate remedial action. Airports must provide for the participation of interested persons, including persons with disabilities and organizations representing persons with disabilities in the evaluation. Evaluations will be on file for three (3) years.

Three-Year Self-Evaluations

Three-year self-evaluations will commence in January and conclude in December of the year listed in the table below. Each self-evaluation will include the following if it is owned or overseen by the Airport:

- Public spaces in terminals, parking, and external accessible routes.
- Public ground transportation.
- Public policies, programs and procedures.
- Identify areas that are not in compliance and create a plan of action to resolve findings.

The Director of Access and Accessible Programs (ADA Director), or designee, will ensure that the three-year self-evaluation is completed in a timely manner. The Director will retain the documents related to the self-evaluations.

Year Due	Start Date	Completion date
2023	January 2021	December 2023
2026	January 2024	December 2026
2029	January 2027	December 2029
Pattern Continues	Every Three Years	

Grievances

Qualified people with disabilities can submit a grievance if they feel that have been discriminated against based on disability. Individuals have 30 days from perceived discrimination to make a complaint. The following information must be collected from the requestor:

- Name and contact information
- Description and date of the complaint
- Description of suggested relief

If further information is required, the Director of Access and Accessible Programs (ADA Director) will request the information. Once all the information is received, the ADA Director will oversee the process and work to resolve the request. Responses from the Airport will be in documented in writing. If the ADA Director is unable to propose a mutually acceptable resolution to a grievance, the guest may request an appeal. Airport guests have 30 business days from the date on the letter from the Airport to request an appeal. Requests for appeals should be directed to Saron.Mckee@phl.org. If the guest does not request an appeal the Airport decision is final. The informal appeals decision is final. The dates mentioned in this section may be flexible upon request. Our goal is to resolve all concerns as quickly as possible.

Reasonable Accommodations / Modifications

§ 35.130(b)(7)(i),

PHL Entities are responsible for physical accessibility and program accessibility. Physical accessibility ensures that individuals can access the built environment and program

accessibility ensures equal access to programs, services, activities, and information provided by the PHL Entities. Departmental employees will include the ADA Director for an ADA review of all new amenities that will be available to the public.

PHL Entities will make reasonable modifications for people upon requests. The Communications Center is often the initial point of contact and are available 24 hours a day / 7 days a week. When requests are received at the Communication Center, they will be forwarded to the appropriate parties (i.e., Airlines, TSA, etc.) to request such an accommodation. While in the Airport, travelers may direct requests for accommodations to the Information Counters, which shall assist the guest in contacting the person for such accommodation. Information Counter staff and the Communications Center Staff will convey such requests for accommodations to the ADA Director as appropriate. Additionally, guests may contact Saron Mckee directly.

Most requests can be approved immediately and without the need for additional information. As one example, a person with low vision may ask for help reading the signs. If the accommodation cannot be completed onsite immediately due to need for additional information the request must be submitted to the ADA Director for a decision. The decision will be in writing. If the guest disagrees with the decision, they have 14 days to appeal.

Sunflower Lanyards are available from the information desks for guests who may need a little extra assistance due to a hidden disability. If employees see a person wearing a Sunflower Lanyard, they should simply introduce themselves and ask if they can be of assistance.

In order to accommodate those with disabilities, a traveler may be picked up or dropped off in any location, providing it is feasible and safe to do so. Additionally, the Transportation Security Administration ("TSA") has specially designated lanes at security checkpoints for persons with disabilities.

Requests including wheelchair assistance, skycaps, sighted guides and electric carts are handled by each Airline, and if assistance is necessary, the traveler should give advance notice of such accommodations to the appropriate airline. Our policy is to include the phone numbers on our website (www.phl.org) of all Airlines servicing PHL under 'Airline Information'.

PHL has updated its emergency policy to include considerations for people with disabilities and persons with limited English proficiency. The policy and procedures will be evaluated periodically.

PHL Entities will ensure that communications with guests with disabilities and their companions are as effective as communications with others. The purpose of effective communication is to ensure that people with communication disabilities can receive information from, and convey information to, the Airport. The type of communication necessary to ensure effective communication will vary on a case-by-case basis. Signage must be used to enhance communication and all new signage must be provided in accordance with the 2010 ADA Standards.

This policy upholds the commitment of the Airport to operate the policies, practices, procedures, services, buildings, and activities so that, when viewed in their entirety, they are accessible to and useable by people with disabilities.

Service Animals

This policy applies to all public entities related to PHL and their contractors, tenants, and licensees collectively known as “PHL Entities”.

Under 49 CFR § 27.71(a) and 28 CFR § 35.130 facilities and services must be readily accessible to and usable by people with disabilities.

- Qualified people with disabilities may not be excluded from opportunities to participate in programs because of their disabilities.

PHL Entities must make reasonable accommodations and modifications to their services and rules, as needed for a person with a disability to participate in their programs. Needed accommodations and modifications are only unreasonable if they would result in an undue burden, create a direct threat to health and safety of others, or fundamentally alter the type of service being provided.

In addition to the general requirements for reasonable accommodations and modifications people with disabilities are specifically allowed to bring service animals into public areas.

Public entities and their contractors, tenants, and licensees are prohibited from requiring documentation that an animal has been:

- certified,
- trained, or
- licensed as a service animal.

However, there are several qualifications for service animals.

Recognized service animals include only dogs or miniature horses that are trained to perform a task to assist a person with a disability. In addition to exclusions for direct threats or fundamental alterations public entities are also explicitly allowed to exclude any service animal that is out of control or not housebroken.

Additional DOJ guidance on the ADA's service animal provisions, clarifies that requiring vaccination for all dogs, including service animals, are permissible. PHL entities will accept all types of verification including ID tags and veterinarian paperwork.

In the event that a service animal is excluded, PHL entities must still give the person with a disability the opportunity to receive service, without having the service animal on the premises. If a service animal is excluded document the event with the details of when and why the animal was excluded as well as how the person received alternative service in order to benefit from the program. Maintain documents for 3 years.

Contract Clauses

Under 28 C.F.R. 35.130(b), a public entity, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of a disability, deny a qualified individual with a disability, the opportunity to participate in or benefit from the aid, service or benefit.

As Contracts, Leases, Licenses and other Agreements come up for renewal, PHL Entities will request that the Law Department include appropriate language (ADA, Section 504, and clauses that prohibit disability discrimination under all applicable statutes and regulations), prohibiting discrimination on the basis of a disability.

Training and Oversight

PHL must implement policies and procedures to ensure regular training and monitoring of staff and entities working at the airport. PHL holds ADA Committee Meetings and ADA Team meetings, as well as training for departments and individuals, as needed. The importance of monitoring and maintenance, as well as the ADA compliance requirements are discussed, and attendees are asked to reiterate the requirements with their staff.

Engineering (and Contractors) follow the 2010 ADA Standards for Accessible Design whenever PHL undergoes a renovation of the facility or engages in new construction. PHL requests that Engineering ensure that Contractors follow these standards. In general, the standards state that a public entity shall be designed and constructed in such a manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities.

New amenities, alterations, new construction and other changes that have ADA implications must include a review by the Director of Access and Accessible Programs and must meet 2010 ADA Standards.

Maintenance of Accessibility Features

PHL Entities must ensure that facilities are maintained in operative condition to be usable by individuals with disabilities. PHL Entities must promptly repair accessibility features that are damaged or out of order. If an accessibility feature is out of order, the Airport must take reasonable steps to accommodate individuals with disabilities who would otherwise use the feature (Ex. Elevators).

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During the Philadelphia Airline Managers Council (PAMC) meetings, held at least quarterly, it shall be reiterated to the Airlines, the importance of complying with ADA Regulations. This includes, but is not limited to, keeping accessible paths of travel cleared, ensuring lowered counter space is not cluttered, and ensuring that gate seating is arranged in such a way as to not

block the aisle and to maintain accessibility. If any Airline has additional questions, they are to contact the Director of Access and Accessible Programs.

Inspections throughout the terminals are completed regularly by maintenance, operations, and ADA, and issues are reported to Job Control who dispatches a work order to make the repairs.

Conclusion

PHL has designated Saron McKee as the Director of Access and Accessible Programs to ensure continued compliance. As such, Saron is responsible for ensuring that the facility meets applicable compliance standards and ensuring that people with disabilities have equal access to PHLs programs, services, and activities. Saron can be reached at Saron.McKee@phl.org.

Employees who believe the Airport has violated their rights under the ADA should contact their Department HR Manager or the EEO officer in the Office of Labor Relations