Philadelphia International Airport
American's with Disabilities (ADA) Policy

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 grant 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. § 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.

Self-Evaluations

Under 49 C.F.R. 27, Airport operators and sponsors 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. Airport operators and sponsors must provide for the participation of interested persons, including persons with disabilities and organizations representing persons with disabilities in the evaluation. All Airport operators and sponsors must keep the evaluation on file for three (3) years (49 C.F.R. 27.11 (c) (2) and(3))).

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:

- Review of public spaces in terminals, parking, and external accessible routes.
- Public policies, programs and procedures will be reviewed and updated on an ongoing basis to ensure compliance with applicable laws and standards.
- Public ground transportation provided by the Airport will be included.
- Identify areas that are not in compliance and create a plan of action to resolve findings.

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

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Grievances
Qualified people with disabilities can submit a grievance if they feel that they have been discriminated against based on disability. 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. If a member of the public feels that they have been discriminated against based on disability they have 14 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 Manager of Access and Accessible Programs (Manager) will request the information. Once all the information is received, the Manager will oversee the process and work to resolve the request. Responses from the Airport will be in documented writing. If the Manager is unable to propose a mutually acceptable resolution to a grievance, the guest may request an appeal. Airport guests have 10 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 on the 15th business day after the date on the letter. The informal appeals decision is final.

Procedures for Reasonable Accommodations / Modifications

Under 28 C.F.R. § 35.130(b)(7)(i), 49 C.F.R. 27.7 and 37.6, Airport operators and sponsors must ensure that its services, programs, and activities are accessible to persons with disabilities. Airport operators and sponsors must make reasonable modifications to its policies, practices, and procedures when the modifications are necessary to avoid discrimination based on disability, unless the Airport can demonstrate that the modifications would fundamentally alter the nature of the service, program, or activity. The Airport is 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 Airport.

PHL’s policy is to make reasonable modifications for people making such requests. The Communications Center will be the main point of contact, and call center operators are available 24 hours a day / 7 days a week. Such requests should be directed to the Communication Center, who will submit the request to the appropriate parties, or direct the caller 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 traveler in contacting the appropriate area or person for such accommodation. Information Counter staff will also convey such requests for accommodations to the Manager of Access and Accessible Programs as appropriate.

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'.

The Airport 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.

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 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. Currently, PHL has Quarterly ADA Review Committee Meetings, and the following are invited to attend 1) DOA Staff; 2) Parkway Corporation; 3) All Airlines; 4) TSA; 5) Concessionaires; 6) CBP; 7) Members of the disabled community

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(Including Liberty Resources and PA School for the Deaf); and all others whom wish to attend. 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) are to 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.

**Maintenance of Accessibility Features**

Airport operators and sponsors must ensure that facilities are maintained in operative condition to be usable by individuals with disabilities. Airports 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).

Concessionaires at PHL are responsible for ensuring ADA access in public space (i.e. clear floor space, accessible paths, accessible seating, effective communication, and lower counters that are free from clutter). Additionally, PHL has Concourse Supervisors (Formerly known as Wing Captains) that walk throughout the terminals to ensure that Concessions are accessible and operating efficiently. The Concourse Supervisors also monitor the LCD monitors throughout the Terminals to ensure that closed captioning is enabled and working properly. Such walk-throughs shall be conducted at least twice a month.

During the Philadelphia Airline Mangers 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 Manager of Access and Accessible Programs.

Maintenance and Operations perform daily inspections throughout the terminals, and issues are reported to Job Control who dispatches a work order to the proper shop to make the repairs.

**Conclusion**

PHL designates Saron McKee as the Manager of Access and Accessible Programs to ensure continued compliance. Saron can be reached at Saron.McKee@phl.org.

Saron will be responsible for ensuring that the facility meets applicable compliance standards and will follow-up immediately with the proper unit if an accessibility feature requires attention.

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