



**UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
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Guide: Air Travelers with Developmental Disabilities

This document is a guide to the Air Carrier Access Act (ACAA) and its implementing regulations, 14 CFR Part 382 (Part 382), with respect to passengers with developmental disabilities. It serves as a brief but authoritative source of information for passengers with developmental disabilities as well as airlines about the services, facilities, and accommodations required by the ACAA and the provisions of Part 382.

The primary purpose of the document is to help passengers with developmental disabilities understand their legal rights under the ACAA and Part 382, as well as to provide information to them on how best to prepare for air travel in order to ensure a smooth and comfortable trip.

A second purpose of this document is to offer airline employees and contractors information about the airlines' legal responsibilities to accommodate passengers with developmental disabilities. The document does not expand airlines' legal obligations or establish new requirements under the law. It contains information about existing requirements and suggested practices and procedures for airlines to use to appropriately interact with and respond to the needs of passengers with different types of developmental disabilities.

Air Travel Tips for Individuals with Developmental Disabilities

Who is entitled to protections under the Air Carrier Access Act (ACAA)?

- The ACAA and the Department's disability regulation, 14 CFR Part 382, protect individuals with disabilities in air travel. An "individual with a disability" means any individual who has a physical or mental impairment that, on a permanent or temporary basis, substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment.
- Individuals on the autism spectrum or with other developmental disabilities are individuals with disabilities under the ACAA and Part 382.

What should you know before your trip?

- Airlines can ask about your disability to better understand your needs. When you call the airline asking for accommodations, the airline is allowed to ask questions to better understand your needs. While the airline agents cannot ask for specific medical information related to the disability, they may ask questions to assess whether you can complete the flight safely, whether you need accommodations that the airline is required to provide, or whether reasonable modifications can be made. For example, airline personnel may not ask "What is your disability?" but they may ask "Can you find your way to the gate area?" or "How can I best communicate with

you to provide the safety briefing?” These questions are meant to give the carrier the opportunity to better understand your needs in order to better accommodate you.

- Airlines must provide accurate information about what accommodations they can provide you. Calling an airline ahead of time to learn about the types of assistance it can and cannot provide is important. Airlines must provide accurate information about any aircraft-related, service-related or other limitations on the ability to accommodate passengers with a disability on request. Additionally, by calling ahead, you are giving the airline time to make any reasonable modifications to its policies in order to accommodate you.
- Flight irregularities can happen. It is important to keep in mind the possibility of flight delays, diversions, cancellations and other irregularities. Have a plan of action for any health, sensory, dietary, or other needs in case your flight does not depart or arrive as scheduled.
- You should be familiar with the airport environment if you can. Many individuals on the autism spectrum have difficulties in the airport and on the plane. If you are concerned about yourself or your child’s ability to navigate an airport or take a flight, try to take advantage of opportunities to participate in airport rehearsal programs designed to prepare persons on the autism spectrum or with other intellectual/developmental disabilities for the air travel experience. By offering an airport dry-run which can be as close as possible to the real thing, these programs allow travelers on the autism spectrum or who have other intellectual/developmental disabilities the opportunity to practice entering the airport, obtaining boarding passes, going through security, waiting in the gate area, walking down the jet-way, and boarding, spending time on, and exiting an airplane. (These programs might not be available at all airports or at all times.)

What should you do before your trip?

- Let the airline know in advance if you need accommodations. Although there is generally no requirement to provide notice that you will be traveling, it is often helpful to make reservations as early as possible and let the airline know as far in advance as possible of any accommodation you may need.
- Let the airline know how it may assist you. Give as many details as you can about what you can and can't do with respect to air travel. Be clear and thorough as to exactly what activities are difficult for you. The more information a service provider has, the better they will be able to accommodate you. Describing difficulties too broadly or vaguely may spark the airline’s concern about your ability to complete the flight safely.
- You should identify items you may need for the trip. Many passengers have food preferences, allergies, and special diet needs. Asking the airline in advance about meal services can help you better plan your trip. Passengers are permitted to pack certain food items and medically required liquid in carry-on baggage and take it past the TSA checkpoint. See the TSA website for additional information — <http://www.tsa.gov/traveler-information/food-and-beverages>. Pack items that might assist in soothing you or your child. If you or your child has sensitivity to loud noises, consider bringing noise-cancelling headphones. Also, bring plenty of items that will help keep you or your child occupied during the flight, like books, video games, and DVDs. Also, consider bringing extra batteries for electronic devices.

What should you do if you need assistance to get on and off the airplane?

- If you require assistance in getting on and off the airplane or in making a connection, let the airline know in advance what services you will require. For example, you may not need to use a wheelchair for mobility assistance, but because airports can be large and sometimes confusing places to navigate, you may need assistance in finding your way through the airport and interpreting directional signs.

What airline seat can you use?

- Airlines may not keep anyone out of a specific seat on the basis of disability, or require anyone to sit in a particular seat on the basis of disability, except to comply with Federal Aviation Administration (FAA) or foreign-government safety requirements. FAA's rule on exit row seating says that airlines may place in exit rows only persons who can perform a series of functions necessary in an emergency evacuation. Not all disability-related limitations prevent people from performing these functions. The airline may ask you if your disability prevents you from performing these functions.

Are airlines required to provide you a bulkhead seat if requested?

- Bulkhead seats are seats on an airplane that are not behind another seat. Sometimes, these seats allow for more leg room and personal space. Although some travelers on the autism spectrum may have needs that can be accommodated with a bulkhead seat, airlines are required to give a bulkhead seat to individuals who are either traveling with a service animal or who have a fused or immobilized leg before giving bulkhead seats to other travelers.
- Airlines are also required to provide other available bulkhead seats to passengers with other types of disabilities if they need it to readily access the air transportation service. The airline may ask how a particular seat will allow you to access the air transportation service. For example, a child on the autism spectrum may benefit from a bulkhead seat or another seat with greater legroom if this extra space is needed for soothing techniques during the flight should the child need it.
- Airlines do not have to upgrade you to a higher class of service in order to accommodate your disability. On some aircraft, the bulkhead seat may not be available in standard economy class as the bulkhead seats may be in the premium economy section.

How do airlines assign bulkhead seats to passengers with a disability?

- Airlines that provide advance seat assignments to passengers must either (1) block an adequate number of bulkhead seats for passengers traveling with a service animal or who have a fused leg; or (2) designate an adequate number of bulkhead seats as “priority” seats for such passengers.
- An airline using the “priority” method may assign the designated priority seats to other passengers but those passengers are subject to being reassigned to another seat if necessary to provide a seating accommodation to a passenger with a fused leg or traveling with a service animal.
- An airline using the “block” method is required to reserve “blocked” seats for passengers traveling with service animals or with a fused leg until 24 hours before the scheduled departure time of the flight. If another passenger requests a bulkhead seat more than 24 hours before the scheduled departure time of the flight then the airline won't provide the blocked seat for the use of that passenger.

- An airline, whether it uses the block or priority method, must assign to a passenger with other types of disabilities a seat that accommodates the passenger's needs even if that seat is not available to the general population at the time of the request. For example, if you need a bulkhead seat to accommodate your disability, and the only remaining bulkhead seat on your flight is not available to the general public unless a seat selection fee is paid, the airline is required to assign you that bulkhead seat without charging a fee if the seat is in the same class of service as the ticket you purchased.

What can you do to best ensure that you receive the seating accommodation you need?

- To increase the likelihood that you will be able to receive the type of seat that you need, you should make reservations as early as possible and request the needed seating accommodation. While an airline is not required to allow you to select a specific seat, it is required to provide you a seat that meets your needs (with certain limitations for bulkhead seats and emergency-exit seats). For example, if you call and request seat 7C because it is an aisle seat on the right side of the aircraft, the carrier may fulfill its obligation by giving you 8C which is also an aisle seat on the right side of the aircraft.

What happens to the seat you reserved if there is an aircraft change?

- If you have given advance notice to the airline about the seating accommodation you need and have received a seat assignment, and there is an aircraft change, your request for accommodation should be transferred to the new seating map for the replacement airplane. While the airline may not guarantee that you receive the exact same seat assignment, the new seat assignment should provide the same level of accommodation that your original seat assignment does.

What animals are considered to be service animals?

- Service animals are animals that assist an individual with a disability to cope with his or her disability by performing a wide variety of functions. For instance, guide dogs are used by individuals who are blind to guide them through day-to-day activities. Other types of service animals alert persons with hearing impairments to sounds, warn individuals of imminent seizures, pull wheelchairs or carry and pick up items, provide balance and support for persons with mobility impairments, and provide emotional and psychiatric support. Certain unusual service animals (e.g., snakes, other reptiles, ferrets) pose unavoidable safety and/or public health concerns and airlines are not required to transport them.

What should you do if you are traveling with a service animal?

- To show that an animal is a service animal, you will need to provide credible verbal assurance, harness or tags, or animal identification cards. Airlines must accept your credible verbal assurance, identification cards, or the presence of harnesses or tags as evidence that an animal is a service animal. Airlines may require documentation if you are traveling with an emotional support animal or psychiatric service animal (see next question below).
- Airlines are required to permit service animals used by persons with disabilities to accompany them on a flight so long as the service animal is well-behaved (e.g., doesn't run freely, jump on

people or relieve itself in the cabin or gate area) and doesn't obstruct an aisle or other area that must remain unobstructed (i.e., fits on your lap or under your seat or at your feet).

What should you do if you are traveling with an emotional support animal or psychiatric service animal?

- If you are traveling with an emotional support animal or psychiatric service animal, the airline may require a letter from your doctor. You should provide the letter to the airline at least 48 hours before travel and have a copy of the letter with you on your travel date. The letter should be dated within one year of your date of travel and it should be on the letterhead of a licensed mental health professional or medical doctor specifically treating your disability.
- The letter should contain the following information:
 - That you have a mental or emotional disability recognized in the current edition of the Diagnostic and Statistical Manual of Mental Disorders (DSM), though it does not need to specify which one;
 - That you need your emotional support animal or psychiatric service animal as an accommodation for air travel and/or for activity at your destination;
 - That the individual providing the assessment is a licensed mental health professional providing professional care to you;
 - The date and type of the professional's license, and the state or other jurisdiction in which it was issued.

When may an airline deny you boarding?

- Airlines may deny boarding or remove a passenger with a disability if the airline believes that the passenger poses a significant risk to the health or safety of others; and if the risk cannot be eliminated by a modification of policies, practices, or procedures, or by the provision of auxiliary aids or services. For example, airlines can remove a passenger with Tourette syndrome who yells the word "bomb" for triggering safety concerns. Airlines may also remove a passenger who kicks the back of the seat in front of him or her if verbal discouragement of that behavior by the crew or travel companion is ineffective, even if this behavior is disability-related, but can only do so if the risk cannot be eliminated by a modification of policies. For instance, if the flight is not full the airline may be able to move the passenger to a seat where the kicking behavior would not affect other passengers or the safety of the flight. If there are bulkhead seats not already assigned to travelers with service animals or fused legs, the airline may also be required to provide a bulkhead seat to a person with a disability who kicks the backs of seats.
- Safety and health risk needs to be assessed on a case by case basis. Airlines cannot assume a risk based on a person's autism or other developmental disability diagnosis.
- If an airline refuses to allow you to travel on your originally scheduled flight for reasons relating to your disability, the airline must provide a written statement describing the reason within 10 calendar days of the flight date. This applies even if the carrier denied transportation on that flight for safety-related reasons.

When may the airline require that you travel with another person?

- Airlines cannot require you to travel with another person except in very limited circumstances. Any requirement to travel with another person must be related to safety.
- If you are unable to follow safety instructions from airline personnel or to assist in your own emergency evacuation, the airline may require a safety assistant to travel with you. By calling the airline ahead of time and discussing your needs, you will be better prepared if you find out that the airline will require a safety assistant.
- A safety assistant is different from a personal care attendant. The role of the safety assistant is to assist in the event of an emergency.
- If you believe that you need a personal care attendant or a safety assistant, you will need to pay the cost of the air transportation for that person.
- If an airline argues that a safety assistant is required and you disagree, then the airline can require the safety assistant but must not charge you for the transportation of the safety assistant. Airlines have the decision-making authority over how a safety assistant will be identified in these situations. Airlines may ask an off-duty airline employee traveling on the same flight to function as a safety assistant, seek a volunteer from among other customers traveling on the flight or ask you to choose a safety assistant and offer a free ticket to that person. Airlines are not obligated to find a safety assistant to accompany the person with a disability.

What should you do if your disability requires escort service or personal care service?

- Airlines are not required to provide escorts to stay with or supervise passengers while in the terminal or in flight. In the past, some airlines offered an adult assistance program in which continual care is provided for a fee. Today, airlines generally do not offer this service. Airline employees are not required to provide personal care services such as assistance with eating, assistance using the restroom, or administering medications. Airlines are required to assist in preparation for eating, such as opening packages and identifying food.

What should you do when you first arrive at the airport?

- **If you need accommodations, identify yourself to the airline staff.** When you arrive at the airport and check in at the ticket counter, confirm with the airline that it has a record of your accommodation request, such as boarding or deplaning assistance before travel. Airlines generally cannot require you to provide advance notice of the fact that you are traveling on a flight to receive accommodations but we strongly encourage you to do so. Providing detailed information about the accommodations you need in advance of travel will assist airline employees in providing those accommodations in a correct and timely manner. Whether or not you requested accommodations in advance, if you need any such service you should identify yourself to staff of your airline when you arrive at the airport to obtain needed assistance.
- **If you have trouble using a kiosk, ask for help.** Many airlines use kiosks for passenger and luggage check-in. If you need assistance in using a kiosk, request help from an airline representative. If the airline representative is unable to assist you at the kiosk, you may be told to go to the counter. You may be allowed to approach the counter without waiting in line if your disability prevents you from using the kiosk and the airline representative could not assist you at the kiosk.

- **Give yourself plenty of time.** You should arrive early at the airport and familiarize yourself with the terminal to know where restrooms, gates, and food vendors are located. Arriving early also allows you enough time to obtain your boarding pass and go through TSA screening even if there are delays. Additionally, it is possible that the gate number printed on your boarding pass may change, so arriving early allows you time to check the departure screens if there is a gate change.

What should you do after you arrive at the gate?

- If you need additional time or assistance to board the aircraft, consider requesting to pre-board. Airlines must allow passengers with disabilities the opportunity to pre-board who self-identify at the gate as requiring additional time or assistance to be seated or stow accessibility equipment. In order to take advantage of this opportunity, a passenger must make a request to the gate agent. The airline is not required to offer pre-boarding to individuals traveling with the passenger with the disability unless the companion is a personal care attendant or safety assistant.
- It is important to consider food options for the flight, particularly if you are traveling on a long flight and meal services provided on the flight may not meet your needs. Consider purchasing food and snacks at the airport after going through security and bringing them on the airplane.

What should you do if you have trouble with receiving disability accommodations at the airport or on your flight?

- If you believe your rights under the Air Carrier Access Act are being or have been violated, ask to speak with a Complaints Resolution Official (CRO). A CRO is the airline's expert on disability accommodation issues. Airlines are required to make one available to you, at no cost, in person at the airport or by telephone during the times they are operating.

How can you file a disability-related complaint with the DOT?

- If you experience a difficulty at any time throughout your flight experience, and you are not able to resolve the problem with the airline, you can call the DOT Aviation Consumer Protection Division's disability hotline at 1-800-778-4838. The hotline is staffed from 9:00 am to 5:00 pm ET Monday through Friday, except federal holidays.
- If you have a negative experience on a flight and feel that you were denied required accommodations, you should file a complaint with the DOT at www.transportation.gov/airconsumer. That website also has other valuable information for consumers about their rights when traveling.

Tips for Interacting with Individuals with Developmental Disabilities

- Developmental disabilities are disabilities that are either inborn or acquired early in life. They may affect a person's ability to communicate, coordinate movements, or process sensory input. Some people with developmental disabilities also have cognitive or intellectual disabilities, which affect a person's ability to reason, understand and learn.
- Autism is a developmental disability that is characterized, in varying degrees, by social and communication differences, difficulty managing sensory input, atypical body movements,

heightened need for consistency or routine, and difficulties understanding and expressing language.

- Understand that individuals on the autism spectrum or with other developmental disabilities are individuals with disabilities under the Air Carrier Access Act and its implementing regulation, 14 CFR Part 382.
- Don't make assumptions about people's needs if their behavior appears unusual to you. Developmental disabilities may cause people to reason, draw conclusions, or respond more slowly. People with developmental disabilities may appear easily distracted even if they are paying attention. Some people with a developmental disability may understand information better if you write it down, others if you explain verbally. They may also find the background noise of a busy airport terminal extremely distracting and have difficulty focusing or understanding you if it is loud.
- Avoid potentially offensive terms or euphemisms. Commonly accepted terminology includes "people with disabilities" or "a person with a cognitive, intellectual or developmental impairment." Many people are offended by the words mental retardation or retardation. Try to avoid euphemistic language like "different abilities" or "differently abled." The word "disability" is widely accepted. If you are unsure how to refer to someone's disability, ask the person with a disability.
- If you have to conduct an individual safety briefing, do it discreetly to respect the privacy of the person with a disability.
- Speak calmly and be prepared to repeat what you say. Use direct, concrete phrases with no more than one or two steps. Use pictures and objects to illustrate your words if helpful, particularly when giving a safety briefing. For example, tell someone, "Please wait beside the counter. I will help you as soon as I can," and not, "You can wait over there and get your boarding pass out while you're waiting, and I'll be able to provide assistance in a little bit after I help the other passengers waiting in line to speak to me first."
- Allow extra time for the person to respond. Passengers with developmental disabilities may need extra time to process information. They may repeat what you said or ask the same questions repeatedly, which is a form of communication, and is not meant to be disrespectful.
- Be patient and aware of your body language and facial expressions to establish effective communication. Speak directly to the person with a disability and not to someone who is traveling with that person or accompanying that person (e.g., pushing the wheelchair). For example, ask the passenger what assistance he or she needs instead of asking the person next to him/her what assistance is needed. Watch for hand gestures and body languages that indicate you are losing patience with the passenger. Stay calm both with respect to your body languages and your tone of voice.
- Ask people with disabilities directly about their needs. You cannot ask what specific disability a passenger has but you may ask questions such as "How may we best assist you?" If a person with a disability uses a term that you are not familiar with or don't understand and is unable to explain it to you, you should contact the Complaint Resolution Official to discuss how best to proceed.

- Do not assume what accommodations a person needs. Each individual with developmental disabilities has different skills and different difficulties that could require accommodations.
- Ask how a particular seat will allow the passenger with a disability to access the air transportation service. Although some travelers with developmental disabilities may have an accommodation need that can be met with a bulkhead seat, you are required to give precedence for a bulkhead seat to an individual who is either traveling with a service animal or who has a fused or immobilized leg. You are also required to provide any available bulkhead seats to passengers with other types of disabilities who need one in order to readily access the air transportation service even if not available to the general public at the time of the request. For example, if a passenger needs a bulkhead seat to accommodate his/her disability, and the only remaining bulkhead seat on the flight is not available for the public unless a seat selection fee is paid, you are required to assign that bulkhead seat to the passenger without charging a fee if the seat is in the same class of service as the ticket the passenger purchased.
- Airlines cannot require an individual with a disability to travel with another person except for safety related reasons. Concerns about a passenger's ability to use the lavatory or the passenger's need for assistance in eating are not legally permissible reasons to require a passenger with a disability to travel with another person.
- Inform passengers about any aircraft-related, service-related or other limitations on the airline's ability to accommodate passengers with a disability as appropriate. For example, airline personnel are not required to provide personal care services such as assistance with actual eating, assistance in using the restroom, or administering medications. This is important information for passengers to know so they can adequately plan for their trip.
- The airline must provide a written explanation within 10 calendar days of the flight date to the passenger with a disability if the airline refuses to allow an individual with a disability to travel on his or her originally scheduled flight on a basis related to of his or her disability. This applies even if the carrier denied transportation on that flight for safety-related reasons.

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