




**The City of
OKLAHOMA CITY**

DEPARTMENT OF AIRPORTS

DEPARTMENTAL POLICY NO. 18 - 01

TO: Department of Airports Employees and Airlines, Tenants, Concessionaires, Consultants, Permittees, or Contractors

FROM: Mark Kranenburg
Director of Airports 

DATE: January 25, 2018

SUBJECT: REASONABLE ACCOMMODATION

This Departmental Policy provides general guidance for use by Department of Airports personnel and other designated staff, airlines, tenants, concessionaires, consultants, permittees, and contractors in addressing and resolving reasonable accommodation requests on airports owned and/or managed by the Oklahoma City Airport Trust (OCAT) and the Department of Airports staff. Department of Airports personnel and other designated staff, airlines, tenants, concessionaires, consultants, permittees, and contractors are required to comply with the ADA. The adoption of this policy in no way negates past, present, or future compliance obligations.

I. Background

The purpose of the ADA is to ensure that people with disabilities are afforded the same rights and privileges as people without disabilities and to prohibit discrimination based on disabilities in state and local government services, public accommodations, and commercial facilities. Through Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131 to 12189 as implemented by Department of Transportation regulations 49 CFR parts 37 and 38), the Act applies to programs, services, and activities offered by OCAT, and those provided by airlines, tenants, concessionaires, consultants, permittees, or contractors (collectively "stakeholders") to the public under contract with OCAT on any of OCAT's airports. OCAT is committed to providing equal access in full compliance with the provisions of the ADA. OCAT is also committed to ensuring that the stakeholders understand their obligations under the ADA, that individuals are informed about their rights under the ADA, and that stakeholders comply with the ADA.

Similarly, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) prohibits discrimination based on disability by any state or local government that receives federal financial assistance. Since the airports operated by OCAT receive federal financial assistance, the activities, services, and programs provided by OCAT, including those provided by the stakeholders who do not receive federal financial assistance but who are under contract with OCAT, must comply with Section 504.

II. REQUESTS FOR REASONABLE ACCOMMODATION

To comply with the ADA and the Rehabilitation Act, OCAT and its stakeholders providing services to the public are required to make reasonable modifications to policies, practices, and procedures to avoid discrimination based on disability unless the modification would fundamentally alter the nature of the program, service, or activity, would cause an undue financial or administrative burden, or would pose a direct threat to the health and safety of others. OCAT has informed its stakeholders of their requirement to assist qualified individuals requesting accommodations and requires stakeholders to provide training to stakeholder employees on accommodation requests. This policy will assist those responding to a reasonable accommodation request at OCAT Airports.

A reasonable modification or a reasonable accommodation is a change or exception to a practice, policy, or procedure that allows individuals with disabilities to have equal access to programs, services, and activities. A reasonable accommodation request may be made by the person with the disability, or by another person on behalf of the disabled person, and may be made to the airport or to a stakeholder directly. An individual requesting a reasonable accommodation is not required to use any specific language. For example, the term "reasonable accommodation" does not need to be in the request. The individual making the request should describe what accommodation is needed to use the program, service, or activity. OCAT, airport employees, or any of OCAT's stakeholders or their employees should process requests for reasonable accommodation as promptly as is reasonably possible. The time necessary to process a request will depend on the nature of the accommodation. Individuals who require reasonable accommodations to access facilities, programs, services, or activities are encouraged to submit a request in advance directly through the stakeholder providing the service.

If an employee of the airport, a stakeholder, or an employee of a stakeholder is unable to comply with an accommodation request or believes the request would fundamentally alter the nature of the program, service, or activity, would cause an undue financial or administrative burden, or would pose a direct threat to the health and safety of others, then he or she should inform the airport's ADA Coordinator, or the airport's operations staff in the ADA Coordinator's absence, and advise why the request cannot be accommodated. The ADA Coordinator may review all denied requests for accommodations and may help identify a reasonable accommodation.

The ADA Coordinator's contact information is as follows:

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Federal Program Manager and ADA Coordinator
7100 Terminal Drive, Unit 937
Oklahoma City, OK 73159
Phone: (405) 316-3223
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