



POLICY

Title:	Service Animals on Campus
Effective Date:	Reviewed December 1, 2019
Approved By:	President's Council
Responsible Party:	Director of Safety & Security
History:	1/14/16
Related Documents: Service Animal Registration Form	

I. PURPOSE

The purpose of this policy is to provide the University community with guidelines for the use of Service Animals by students and employees on campus. This policy will assist in:

- Understanding the rights of students and employees with disabilities who utilize Service Animals
- Identifying the types of Service Animals
- Providing a framework for managing Service Animals on campus

II. DEFINITIONS

Accommodation: Any modification or adjustment in policies, practices, procedures, or work/school/housing environment to enable a qualified individual with a disability to enjoy equal opportunities and access to University rights, privileges, benefits and services.

Service Animals: Service animals are animals trained and certified to assist people with disabilities in the activities of normal living. The Americans with Disabilities Act (ADA), as amended in 2008, defines a service animal as: "any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Emotional support animals, comfort animals, and therapy dogs are not service animals under Title II and Title III of the ADA. Other species of animals, whether wild or domestic, trained or untrained, are not considered service animals either. The work or tasks performed by a service animal must be directly related to the individual's disability. It does not matter if a person has a note from a doctor that states that the person has a disability and needs to have the animal for emotional support. A doctor's letter does not turn an animal into a service animal.

The work or tasks performed by a service animal must be directly related to the Partner's disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence

of people or sounds, providing non-violent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, retrieving items such as medicine or the telephone, providing physical support and assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors. The crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition.”

Types of Service Animals:

- ***Guide Dog or Seeing Eye® Dog*** is a carefully trained dog that serves as a travel tool for persons who have severe visual impairments or are blind.
- ***Hearing or Signal Dog*** is a dog that has been trained to alert a person who has a significant hearing loss or is deaf when a sound occurs, such as a knock on the door.
- ***Psychiatric Service Dog*** is a dog that has been trained to perform tasks that assist individuals with disabilities to detect the onset of psychiatric episodes and lessen their effects. Tasks performed by psychiatric service animals may include reminding the handler to take medicine, providing safety checks or room searches, or turning on lights for persons with Post Traumatic Stress Disorder, interrupting self-mutilation by persons with dissociative identity disorders, and keeping disoriented individuals from danger.
- ***SSigDOG (sensory signal dogs or social signal dog)*** is a dog trained to assist a person with autism. The dog alerts the handler to distracting repetitive movements common among those with autism, allowing the person to stop the movement (e.g., hand flapping).
- ***Seizure Response Dog*** is a dog trained to assist a person with a seizure disorder. How the dog serves the person depends on the person's needs. The dog may stand guard over the person during a seizure or the dog may go for help. A few dogs have learned to predict a seizure and warn the person in advance to sit down or move to a safe place.

Individual with a Disability: An individual with a disability is a person who 1) has a physical or mental impairment that limits one or more of a person's major life activities or 2) has a record of having, or being perceived as having, a physical or mental impairment. It does not include current or illegal use of, or addiction to, a controlled substance.

Trainer A trainer is a professionally trained staff person or agent (some organizations utilize volunteer trainers) who works for a dog training program for the purpose of schooling dogs in advanced commands and preparing teams for graduation. Volunteers who raise puppies, care for breeding stock, or otherwise assist program staff are not considered trainers. However, as indicated above, some assistance dog organizations rely on a core of volunteer trainers whose function is identical to that of professionally trained staff, with the exception of pay. For the purposes of determining access, such a volunteer can be considered to be a 'trainer' in the sense described above.

Partner/Handler/Team A person with a disability using a Service Animal is called a Partner. A person without a disability with a Service Animal is called a Handler. Sometimes Partners and Handlers work together with Service Animals, while other times Partners work solely with Service Animals. A Partner, or a Handler, and his/her Service Animal are called a Team. The two work as a cohesive unit in accomplishing the tasks of everyday living.

Pet: A domestic animal kept for pleasure or companionship. Pets are generally not permitted in any university-controlled buildings.

III. POLICY

Salus University supports Equal Opportunity Employment, complies with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 in allowing use of service animals for students, staff and visitors.

Pets and non-research animals normally are restricted on university property. However, under federal law, service animals are not excluded from university property or activities so long as they meet the guidelines set forth in this policy. Service animals are defined as animals that are individually trained to perform tasks for individuals with disabilities such as:

- Guiding people who are blind
- Alerting people who are deaf
- Pulling wheelchairs for those with limited mobility
- Alerting and protecting a person who is having a seizure
- Performing other special tasks.

Service animals are working animals, not pets.

Service animals must have a leash or working harness attached at all times when on Salus property.

IV. PROCEDURE

For an individual to qualify for having a service animal on campus:

- He or she must have a disability as defined by the ADA and
- The accompanying animal must be trained to do specific tasks for the qualified individual.

Service Animal Registration

Individuals who wish to have Service Animals on University property should complete the Service Animal Registration Form and provide required documentation as indicated.

Students who require the use of a service animal on campus are encouraged to contact the Office for Academic Success (OAS) to register as a student with a disability. A student requesting permission to have a Service Animal on-campus must provide from a certified clinician a letter which substantiates: a) if the Service Animal is required because of a disability, and b) what work or task the Service Animal has been trained to perform. The letter must be dated and on letterhead.

Information provided to OAS is confidential. Disability information will not be released without the signed consent of the student.

Employees who require the use of a service animal are to contact the Human Resources Office and provide similar information.

Service animals are not required to wear special collars, vests or harnesses. They are, however, required to be certified.

Conflicting/Competing Disability Accommodations

Students with medical condition(s) affected by Service Animals should contact the Office for Academic Success if they have a health or safety related concern about exposure to a Service Animal. The student registering the concern will be asked to provide medical documentation that identifies the condition(s) allowing a determination to be made as to whether the condition is disabling and whether there is a need for an accommodation.

Emergency Situations

Service animals must wear identifying markers visible to emergency response teams. In the event of an emergency, responding emergency personnel should be trained to recognize Service Animals and be aware that the animal may try to communicate the need for help. The animal may become disoriented from the smell of smoke in a fire or laboratory emergency, or from sirens. The Partner and/or Service Animal may be confused from the stressful situation. Emergency personnel should be aware that the service animal is trying to be protective and, in its confusion, should not be considered harmful. Emergency personnel should make every effort to keep the Service Animal with its Partner. However, emergency personnel's first effort should be to the Partner; this may necessitate leaving the animal behind in certain emergency evacuation situations.

Management and Maintenance of Service Animal

The handler is responsible for the care and supervision of his or her service animal. If a service animal behaves in an unacceptable way and the person with a disability does not control the animal, the University may not allow the animal onto its premises.

Uncontrolled barking, jumping on other people, or running away from the handler are examples of unacceptable behavior for a service animal.

The ADA requires the animal to be under the control of the handler. This can occur using a harness, leash, or other tether. However, in cases where either the handler is unable to hold a tether because of a disability or its use would interfere with the service animal's safe, effective performance of work or tasks, the service animal must be under the handler's control by some other means, such as voice control.

The animal must be housebroken.

The animal should be vaccinated in accordance with state and local laws.

The Partner (student or employee) may request that others avoid: petting or addressing his/her Service Animal as it may distract it from the task at hand, feeding the Service Animal, deliberately startling the Service Animal, and separating or attempting to separate the Partner from his/her Service Animal.

In order to assure the comfort and safety of people with disabilities and the general public, high behavioral and training standards must apply equally to all service animals.

These standards include:

PUBLIC APPROPRIATENESS:

- Animal is clean and does not have a foul odor.
- Animal does not urinate or defecate in inappropriate locations.

BEHAVIOR:

- Animal does not annoy any member of the general public.
- Animal's conduct does not disrupt the normal course of business.
- Animal works without unnecessary vocalization.
- Animal shows no aggression toward people or other animals.
- Animal does not solicit or steal food or other items from the general public.

TRAINING:

- Animal is specifically trained to perform more than one task to mitigate (lessen) the effects of its partner's disability; said disability being any condition as described by and covered under the ADA that substantially impairs one or more major life functions.
- Animal obeys the commands of its handler.
- Animal works calmly and quietly on a harness, leash, or other tether.
- Animal has been specifically trained to perform its duties in public and is accustomed to being out in public.
- Animal must be able to lie quietly beside the handler without blocking aisles, doorways, etc.
- Animal is trained to urinate or defecate on command.
- Animal stays within 24" of its handler at all times unless the nature of a trained task requires it to be working at a greater distance.

To the extent possible, the Service Animal should not:

- Sniff people, dining facilities tables or the personal belongings of others
- Display any behaviors or noises that are disruptive to others unless it is part of the service being provided for the Partner
- Block an aisle or passageway for fire and/or emergency egress.

Maintenance

It is the responsibility of the Partner to ensure cleanliness relating to the presence of the Service Animal on campus. Feces must be cleaned immediately and disposed of properly. This includes University common areas and exterior property such as courtyards, walkways, etc. The University has designated areas for service animals to relieve themselves as designated by the green waste disposal system (plastic bags and disposal container).

1. University staff may require an individual with a disability to remove his service animal from the premises if:
 - a. the animal is out of control and the handler does not take effective action to control it;
 - b. the animal is not housebroken; or

- c. the presence of the service animal will result in a direct threat to health/safety of the service, program, or activity involved.
2. When University staff determines that a person with a disability is required to remove a service animal pursuant to this policy, the University will offer the person with the disability the opportunity to obtain goods or services without the animal's presence.
3. The owner or handler must be in full control of the service animal at all times.
4. Reasonable behavior and proper hygiene are expected from the service animal while on campus. If the animal exhibits unacceptable behavior, the owner is expected to employ proper training techniques and correct the situation to the satisfaction of all parties involved. Service animals with hygiene issues will be denied access to campus until the problem is dealt with effectively.

Campus Access for Service Animals

A Service Animal is permitted to accompany the student anywhere the student goes on campus with the following exceptions, which describe areas that generally are off-limits to Service Animals:

Research Laboratories

Chemicals found in many labs can be harmful to Service Animals. Organisms naturally found on most dogs or other animals could negatively impact the outcome of research.

Mechanical Rooms/Custodial Closets

Such locations can have chemicals or machinery that could potentially harm a Service Animal and Service Animals may cause disruption to services provided in the location.

Clinics

Except in emergency visits, students with a Service Animal must notify and coordinate with clinical administrative staff in advance of the presence of a Service Animal in any University clinic to insure that patient safety is not compromised, as well as the need to minimize the risk of exposing the Service Animal to infections and disease.

Other Potentially Dangerous Areas

Any room, studio or classroom with sharp metal cuttings or glass shards on the floor; excessive dust; or moving machinery may pose a danger to Service Animals. When students with Service Animals must be in one of these restricted areas for a course requirement, alternative arrangements will be considered to provide access. When it is determined unsafe for the Team to be in one of these areas, reasonable accommodations will be provided to assure the student equal access to the academic program or activity.

Appeals Process

If a Service Animal is suspended from any Salus property the Partner can file an appeal. The appeal must be filed in writing within ten (10) days of the suspension. If the Partner is an employee of Salus the appeal is filed with the Vice President of Human Resources. If the Partner is a student the appeal is filed with the Dean of Student Affairs.

- Appeal must contain the Partner's full name and method to contact them.
- The service animals' name and the type of individual training the service animal received to work or task performed.

- Brief description of the circumstance surrounding why the service animal was suspended from Salus property.
- Brief description of why the service animal should be permitted back on Salus property. Names of witnesses can be submitted to support the cause.
- An investigation will be conducted by the Director of Safety and Security in addition with the Vice President of Human Resources for employees and the Dean of Student Affairs for students. The investigation will be informal but will be thorough. All individuals who may have information about the service animal and/ or the incident shall be interviewed.
- A written decision will be furnished to the service animal Partner within ten (10) days of the receipt of the written appeal.
- The Director of Safety and Security shall maintain the records of the incident and appeal for three (3) years following the decision.

If the service animal and /or Partner have repeat suspensions a professional handler of service animals might be sought for an evaluation. The cost of the professional evaluation would be charged back to the employee and/ or Partner.

The University supports the training of service animals. Anyone who wishes to utilize the University and its campuses as a training location is to contact the Dean of Student (for student trainers) or the Director of Human Resources (for employee trainers) to request permission. Written approval must be obtained prior to the animal being on campus. If approved, the puppy in training is required to wear an ID cape or vest issued by the program to which the puppy belongs while on campus. The untrained animal may be excluded from the campus if it becomes a workplace disruption or causes an undue hardship in the workplace.

Questions or concerns regarding service animals on campus can be directed to the Safety & Security Department at 215-780-1401.