

Disability Support Services

Procedures for Assistance Animal in Residential Facilities

The George Washington University (GW) recognizes the importance of assistance animals to individuals with disabilities. The following procedures were established to ensure that GW residents who require the use of assistance animals as a reasonable accommodation receive the benefit of the therapeutic support the animals provide. GW is committed to ensuring equal access to the university's residence halls and has set forth the specific requirements and guidelines regarding the use of assistance animals below. GW reserves the right to amend these procedures, without notice, as needed.

Disability Support Services (DSS) shares responsibility with the University Counseling Center, GW Housing, and the Center for Student Engagement for implementing and enforcing these procedures. The process for making formal accommodation requests starts when a resident with a disability submits documentation from his or her licensed health care or mental health provider to DSS, which documents the GW resident's specific need for an accommodation. The resident's documentation, which must include a recent, comprehensive, clinical assessment from a qualified medical professional, should address the following:

- The nature of the disability and how it substantially impacts a major life activity;
- Evidence that the animal is necessary to afford an equal opportunity to use and enjoy the residence hall;
- The relationship between the disability and the assistance or relief that the animal provides.

After receipt of documentation, DSS will engage with the resident and his or her health care provider to determine the type and details of the accommodation, if any.

I. Definitions:

A. Service Animal

Under the Americans with Disabilities Act of 1990 (ADA) a “service animal” is 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. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person’s disability. An animal’s provision of emotional support, well-being, comfort, or companionship does not constitute work or tasks for the purposes of this “service animal” definition.

B. Assistance Animal

“Assistance animals” provide a disability-related benefit to a person with a disability, but are not trained to perform specific tasks to assist them. An assistance animal is not a service animal, does not assist a person with a disability with activities of daily living, or accompany a person with a disability at all times. An assistance animal assists in an individual’s treatment process. The animal should demonstrate a good temperament and reliable, predictable behavior. An assistance animal is prescribed to an individual with a disability by a healthcare or mental health professional. The assistance animal may be incorporated in a treatment process to assist in alleviating the symptoms of that individual’s disability. This treatment may occur within the person’s residence and, therefore, may be considered for access to university housing.

Unlike a service animal, an assistance animal does not assist a person with a disability with activities of daily living, nor does it accompany a person with a disability at all times. Assistance animals may be considered for access to university housing on a case-by-case basis when recommended by a licensed healthcare or mental health provider to provide emotional support to persons with disabilities who have a disability–related need for such support; however, they are not permitted in other areas of the university (libraries, academic buildings, classrooms, laboratories, etc.).

C. Pet

A pet is an animal kept for ordinary use and companionship. A pet is not considered a service animal or an assistance animal and therefore, is not covered by these procedures. GW residents are not permitted to keep pets on university property or in university housing.

D. Approved Animal

An "approved animal" is an assistance animal that has been granted as a reasonable accommodation under this procedure. Assistance animals must be approved before GW residents are permitted to bring one to campus. The university may request the immediate removal of unapproved animals and the cost of transportation or boarding will be at the owner's expense.

E. Owner

The "owner" is the GW resident who has requested the accommodation and has received written approval to bring the approved animal on campus.

II. Procedures:

A. Assistance animals may not reside in university housing without written approval of university officials. Additionally, only service animals have access to university facilities. Approved assistance animals are restricted to university housing. To request an assistance animal:

1. Register with the Office of Disability Support Services. A GW resident should follow DSS registration procedures.
2. GW residents are required to submit the request by February 10 for returning students and by May 23 for newly matriculating students. When late requests are received, the university cannot guarantee that it will be able to meet the owner's accommodation needs, including any needs that develop during the semester.
3. Provide necessary support documentation from a licensed health care or mental health provider. The health care provider must be reliable and qualified to make the requested assessment and must submit a signed letter on professional letterhead that states the following:

- a. Provider's diagnosis of the nature of the student's disability.
 - b. Provider's opinion that the condition affects a major life activity.
 - c. Provider's professional opinion that the assistance animal is necessary to provide emotional support that alleviates one or more identified symptoms or effects of a person's disability.
 - d. Provider's assessment of the relationship between the disability and the assistance or relief that the animal provides
4. Provide current vaccination and licensing documentation. In accordance with all local ordinances and regulations, the animal must be vaccinated against disease.
- a. Dogs must have current vaccination against rabies and distemper and wear a collar and rabies vaccination tag. Dogs must receive the following: DHLLP shot (yearly, or as recommended in writing by a veterinarian), heartworm test (yearly), rabies shot (every three years), and bordetella shot (yearly), and regular flea treatments (as recommended by a veterinarian).
 - b. Cats do not require licensing, but must receive distemper, rhinotracheitis, calcivirus and pneumontisis vaccinations. They must also receive a rabies shot and regular flea treatment (as recommended by a veterinarian).
 - c. Dogs and cats must be spayed or neutered.

Other animals must be in good health, have completed all vaccinations ordinarily required for a healthy animal and have documentation from a licensed veterinarian dated within the past year stating that the animal is in good health. Local licensing requirements must be followed. The university reserves the right to request removal of the animal if proper documentation is not up to date. GW residents should know the specific requirements for licensing and vaccinations for the District of Columbia, as outlined in DC Code §8-1804 for licenses and fees and §8-1803 for vaccinations.

A record of this information must be provided annually and kept on file in both the Housing and Disability Support Services offices. This record must be provided prior to the resident/owner moving into the residence hall.

III. Responsibilities

A. Responsibilities of the Owner

1. Care and Supervision – Care and supervision of the approved animal are the responsibility of the GW resident who benefits from the animal's use. The owner is required to maintain control of the animal at all times. The owner is solely responsible for ensuring the animal has necessary food and water. The owner is also responsible for ensuring the clean-up of animal waste, and must toilet the animal in areas designated by the university. Indoor animal waste, such as cat litter, must be placed in a sturdy plastic bag and securely tied before being disposed of. Litter boxes should be placed on mats so as not to track waste onto carpeted surfaces. The owners should always carry equipment sufficient to clean up the animal's feces whenever the animal is on campus. In case of emergency, if assistance with cleanup is needed, the owner shall contact housing/maintenance staff to make arrangements and the owner shall be solely responsible for any costs incurred for doing so. Indoor trashcans in the residence hall should not be used for disposal of animal waste. An owner may be directed to remove an animal that is not housebroken.
2. Health – In accordance with all local ordinances and regulations, the approved animal must be vaccinated against disease as described above. The owner is responsible for ensuring the animal is protected from fleas, ticks, and other pests. The university has the authority to direct that the animal receive veterinary attention at owner's expense.
3. Costs – The owner is financially responsible for the actions of the assistance animal, including, but not limited to, bodily injury or property damage. Property damage includes, but is not limited to, repair or replacement of furniture, carpeting, windows, wall coverings, and the like, as necessary. The owner is expected to cover these costs at the time of repair or replacement and/or move-out, as determined by the university. The owner is also responsible for any expenses incurred for cleaning above and beyond a standard cleaning, as determined by the university. The owner is responsible for covering the costs of any necessary fumigation or treatment method used by the university pest control service to remove fleas, ticks, or other unwanted pests.
4. Leash or Animal Carrier – If appropriate, the approved animal must be on a leash or in an animal carrier at all times. Assistance animals must be contained within the privately assigned residential area at all times, except when transported outside the private residential area in an animal carrier or

controlled by a leash or harness. When outside the residence, the owner of assistance animals must carry proof that the animal is an approved animal.

5. Approved Animal No Longer Needed - The owner must notify DSS in writing if the approved animal is no longer needed in the residence as an assistance animal or is no longer in the residence. To replace an approved animal the owner must file a new request for reasonable accommodation.
6. Pest Inspection - The owner's residence may be inspected for fleas, ticks or other pests once a semester or as needed. The GW Housing will schedule the inspection. If fleas, ticks, or other pests are detected through inspection, the residence will be treated using approved fumigation methods by a university-approved pest control service. The owner will be billed for the expense of any pest treatment above and beyond standard pest management in the residence halls.
7. No Overnight Board - Approved animals may not be left overnight in university housing to be cared for by another resident. Animals must be taken with the resident if the resident leaves campus for a prolonged period (more than 24 hours), or boarded. If the owner fails to remove the animal before going on a vacation or extended leave (more than 24 hours), the University reserves the right to remove and, at the University's discretion, board the animal, at the owner's expense, until the owner is able to return to the residence hall.
8. Other Areas of Campus - The approved animal must remain in the residence hall and never be brought into other areas of campus. This includes all dining program spaces, offices, any eating locations, and classrooms. The animal should not be in areas other than the residence hall. The owner may not place vests or other items on the animal that designate it as a service animal.
9. Escape - The owner will notify the GW Police Department if the animal has escaped its confines and is unable to be located.
10. University Personnel in Rooms - Necessary precautions should be made for Facilities Services and other university personnel to enter a residence hall rooms when the owner is not present. The assistance animal should be properly caged or temporarily removed from the residence during the time that personnel are in the residence hall room. The university is not liable if the animal escapes during one of these visits.

11. Assistance Animal Removal - In the event that the Director of Housing or his/her designee determines that an assistance animal should be removed against the wishes of the owner, he or she will provide written notification to the owner, who will have 48 hours to find alternative accommodations for the animal. The owner will be given an opportunity to respond to the concerns, but the Director of Housing or his/her designee's decision is final.
12. Relocating - GW Housing has the ability to relocate the owner and approved animal as necessary according to current contractual agreements.
13. Other Policies - The owner agrees to continue to abide by all other residential policies. Reasonable accommodations that may constitute an exception of procedures that otherwise would prohibit having an animal does not constitute an exception to any other procedures.
14. Violating This Procedure - Violations of this procedure may result in the immediate removal of the approved animal from the university.
15. Continued Housing Obligation - If the approved animal is removed from the university for any reason, the owner is expected to fulfill his/her housing obligations for the remainder of the housing contract.

B. Removal of an Assistance Animal

1. The university may exclude or remove an assistance animal when:
 - a. The animal poses a direct threat to the health or safety of others; or,
 - b. The animal's presence results in a fundamental alteration of the university's program; or,
 - c. The animal or its presence creates a continued disturbance or interference with the university community; or,
 - d. The owner does not comply with the responsibilities listed above.

C. The Presence of Approved Animals and Other Students

1. University staff members will make a reasonable effort to notify residents in the residence hall where the animal will be located, and other residents or students as appropriate, of the presence of an assistance animal in the building.
2. Roommates/Suitemates – Roommates or suitemates sharing the common areas of assigned residential spaces with an assistance animal should be

informed in advance by the resident who submits a request to have an assistance animal live in the room or suite. Concerns regarding the care or control of the assistance animal should be discussed with the owner, with the assistance of university residence hall staff, if necessary.

3. Residents with medical condition(s) that are affected by animals (respiratory diseases, asthma, severe allergies, etc.) are asked to contact DSS if they have health or safety related concerns about exposure to an assistance animal. A concerned individual will be asked to provide medical documentation that identifies the condition(s). The university is prepared to reasonably accommodate such individuals.
4. DSS will resolve any conflicts in a timely manner. Staff members will consider the conflicting needs and/or accommodations of all persons involved. DSS staff may use the Student Health Service as a resource for information on health issues. In the event that an agreement cannot be reached, DSS's decision is final and is not subject to appeal.

IV. Appeal Procedure

Residents who wish to appeal a decision regarding denial of an assistance animal as a reasonable accommodation must submit their request in writing to the Director of Disability Support Services within 10 calendar days of the decision. The Director shall review all information necessary to render a written response and may request of the student additional information and/or documentation. The Director will issue a written response to the appeal within 10 calendar days.

If the resident disagrees with the Director's determination, the resident may file a complaint under the Student Grievance Procedures.