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## University Counseling Centers' Perceptions and Experiences Pertaining to Emotional Support Animals

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### ABSTRACT

Increasing numbers of students are requesting accommodations for emotional support animals (ESAs) in higher education settings. Since the legislation pertaining to this type of service animal differs from the laws governing disability service animals, colleges and universities are faced with developing new policies and guidelines. A sample of 248 University Counseling Centers (UCCs) completed a survey about student requests for ESA letters of support from their counselor. The UCCs were also asked if they issue official disability diagnoses for clients. Responses showed that UCCs are not yet being asked to write many letters of support for ESAs—56.9% almost never do it, and 31.05% do it only several times per year. And, only 47.18% of UCCs write official diagnosis letters in support of disability accommodations. Yet, most UCCs are aware of the need for official policies in this arena. This article provides general recommendations for establishing university policies.

### KEYWORDS

Assistance animal; counseling; emotional support animal; service dog

Anecdotal stories would suggest that requests for emotional support animals (ESAs) are growing on college campuses, yet data on actual request rates are not currently available. Therefore, this study was designed to address the following goals: (a) obtain information about the prevalence of requests to University Counseling Centers (UCCs) for emotional support animals, (b) describe how UCCs are currently handling these requests, (c) share examples of current written policies, and (d) offer suggestions to UCCs on how to handle this growing concern.

### *Role of counseling centers in treatment and diagnosis*

Mental health difficulties among college students are a growing concern for college campuses nationwide. Feelings of hopelessness, loneliness, depression,

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and anxiety are occurring at alarming rates (American College Health Association, 2014). In a national survey of college counseling centers (Gallagher, 2014), many UCC directors report that the percentage of students seeking services is growing, and many of these students are arriving on campus on psychiatric medications and/or with severe psychological histories. In an effort to meet the growing needs of students seeking services, many counseling centers have expanded their external referral networks, and have increased their counseling staff and their psychiatric consulting hours (Gallagher, 2014). Additionally, centers must adapt to new needs among college students, such as documenting disability accommodations, which this article addresses.

### ***Colleges and universities and ADA accommodations***

More students with disabilities, including those with significant psychological challenges, are attending college than ever before (National Center for Education Statistics, 2014). The Americans with Disabilities Act of 1990 (ADA) restated the goal of Section 504 of the Rehabilitation Act of 1973, specifically prohibiting discrimination on the basis of disability in programs receiving federal funding (Americans with Disabilities Act Title II Regulations, 2010; Section 504, Rehabilitation Act of 1973). Under the ADA, colleges and universities must provide protected students with “reasonable accommodations”—reasonable modifications to normal rules and procedures to allow those students equal opportunity to succeed in higher education. This Act also prohibits discrimination against students whose mental health issues “substantially limit a major life activity,” including learning (Bauman, Davidson, Sachs, & Kotarski, 2013; Lee, 2014). Allowable disorders under the ADA may include bipolar, depression, anxiety, obsessive-compulsive, and trauma related disorders. Other acceptable diagnoses include schizophrenia spectrum and psychotic disorders, learning disabilities, attention deficit disorders, autism spectrum disorders, and neurodevelopmental disorders (U.S. Commission on Civil Rights, 2000).

These mandates come at a time when there is an ever-increasing amount of research suggesting that animals have therapeutic benefits for a variety of physical and psychological challenges and disorders (Maujean, Pepping, & Kendall, 2015). For example, Rossetti and King’s (2010) review concluded that animal assisted interventions (AAIs) have positive effects on a wide range of psychological and social outcomes, including reductions in anger, anxiety, depression, and general distress, and beneficial effects on socialization. DeCoursey, Russell, and Keister (2010) came to similar conclusions, suggesting that AAIs have the potential to reduce stress, anxiety, and boredom, as well as improve mood and physiological markers of well-being such as reduced heart rate and blood pressure. Given this backdrop of events and research, it is not surprising that campuses are experiencing more requests for ESAs. The online

chatter about this topic and the hallway conversations of concern are what made this research timely and important.

Colleges and universities are already working to accommodate students with physical disabilities (e.g., blindness) who possess assistance animals in both classroom settings and student housing, as per the standards set forth under the Americans with Disabilities Act (Americans with Disabilities Act Title II Regulations, 2010). A more recent issue, however, is the prevalence of assistance animals obtained for emotional support, otherwise known as emotional support animals (Lipka, 2011).

Animals have been shown to play a variety of useful roles for individuals suffering from a wide array of physical and psychological issues. For example, dogs are able to alert individuals to impending seizures and diabetic hypoglycemic episodes. They have also been shown to alleviate anxiety, depression, post-traumatic stress disorder symptoms, and overall stress as well as helping to increase social engagement and positive emotions (Beetz et al., 2012; Dalziel, Uthman, McGorray, & Reep, 2003; Gonder-Frederick, Rice, Warren, Vajda, & Shepard, 2013; Maujean et al., 2015). It is not surprising, then, that more students are looking toward service and support animals as tools to help with a variety of physical and psychological disabilities. The recent growth and interest in this area, however, has led to unclear regulations, and many schools struggle to understand the new laws and how best to support students in this process.

There is also considerable confusion among the public, as well as counseling staff, regarding the differences between service and support animals in general. To help clarify this confusion and better understand the challenges, we define and contrast service animals and emotional support animals, especially as they relate to college campuses.

### ***Service animals***

A service animal is usually a dog (or in rare cases a miniature horse) that is trained to do work or perform tasks for the benefit of an individual with a physical, sensory, psychiatric, intellectual, or other mental disability. Service animals are working animals, not pets, and the work or task they perform must be directly related to the individual's disability. Examples include assisting sight or hearing impaired individuals, pulling a wheelchair, retrieving items such as medicine or a telephone, recognizing and assisting during seizures, and preventing or interrupting compulsive or destructive behavior. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA (Americans with Disabilities Act title II Regulations, 2010).

A psychiatric service animal (PSA), a subcategory of service animals, is different from an ESA in a number of ways. The PSA is not viewed as a pet

but is a working service animal and according to ADA guidelines can only be either a dog or miniature horse that is individually trained in specific tasks to assist people who have an emotional or psychiatric disability so severe that it substantially limits their ability to perform at least one major life task. An example might be a dog that helps an individual with Post-Traumatic Stress Disorder feel safe when they become fearful around loud noises. Because the PSA is a service animal, it is permitted to have access to any public setting including restaurants, movie theaters, classrooms, and so on.

Under the ADA, state and local governments, businesses, and nonprofit organizations that serve the general public must allow service animals to accompany people with disabilities in all areas of the facility where the public is normally allowed to go (e.g., campus buildings and residence halls). Although service animals are exempt from no-pet policies, they must be under effective control at all times, cannot harm or threaten others in the community, and must be housebroken. The animal may be excluded from areas where its presence fundamentally alters the nature of a program or activity, if the animal is disruptive, if its presence would result in substantial physical damage to the property of others, or if it substantially interferes with the reasonable enjoyment of housing or public accommodation by others (U.S. Department of Justice [DOJ], Civil Rights Division, 2010).

There are also laws related to what queries can be made about service animals. When it is not obvious what service an animal provides, only limited inquiries are allowed, such as asking if the dog is a service animal that is required because of a disability, and what work or task the dog has been trained to perform. People cannot ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task. According to the ADA, allergies or fear of dogs are not valid reasons for denying access or refusing service to people with service animals. (DOJ, Civil Rights Division, 2010).

### ***Emotional support animal***

An ESA differs from a service animal in some fundamental ways. The first critical difference is that the ESA is not trained in specific tasks to assist an individual with a disability and as a result, the ADA does not recognize ESAs as service animals. The mere presence of the ESA provides comfort and relief from particular symptoms associated with a given disability (U.S. Department of Justice, Civil Rights Division, Disability Rights Section, 2015). An ESA is not only a pet, but is viewed as an animal that provides emotional support and/or therapeutic benefit to an individual with a verifiable mental or psychiatric disability. In contrast with the laws surrounding service animals, there are currently no federal restrictions on the species, size,

or weight of an animal in an emotional support role. Therefore, an ESA could conceivably be a dog, cat, rabbit, gerbil, or any species permitted under local laws.

Under the Fair Housing Amendments Act of 1988 (Wisch, 2015), and following the federal definition of disability, an ESA is seen as a reasonable accommodation for a disabled person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such an impairment (U. S. Department of Housing and Urban Development, n.d.). The United States Department of Housing and Urban Development (HUD) views ESAs similarly to other aids such as a wheelchair that provide a person with a disability an equal opportunity to live independently, however, the ADA does not consider the need for an ESA as a disability that warrants special accommodations. HUD states that “assistance animals” (ESAs) are not required to have special training for work or tasks nor need to be certified (Office of Fair Housing and Equal Opportunity, 2013). Table 1 provides a summary of the differences between service animals and ESAs.

Many schools are understandably concerned about recent legal challenges pertaining to ESAs and service animals on campuses. Some of the confusion likely stems from the differences in laws governing the two types of assistance animals. While service animals can be brought into any public location, including classrooms, the laws pertaining to ESAs are limited to housing and common areas. While ESAs are allowed in campus housing, this does not mean that an ESA is necessary or appropriate for a classroom setting. Under this lens, a request to bring an ESA to class would be viewed similarly to other unusual accommodations and should be given individualized consideration. Similar to other accommodations, another consideration is the animal’s possible effect on the class. Since ESAs do not have to be trained, it is possible they might be disruptive to other students, thereby, unreasonably burdening both the institution and other students (Masinter, 2015).

Many service animal owners have concerns about the negative effect of ESAs on their personal credibility. There are a growing number of anecdotal stories about people with service animals facing increased questioning and resistance; something they attribute to the growing proliferation of people with ESAs (Teitell, 2013). Additionally, there are several businesses that offer, for a fee, to “register” or “certify” ESAs, prerequisites that are not required of ESAs. For example, the United States Dog Registry offers to “register” and “certify” any animal as an ESA for as low as \$79.00 (United States Dog Registry, 2013).

There have been several recent legal challenges related to these types of animals. For example, in *Alejandro v. Palm Beach State College*, a ruling was made in favor of a student’s right to be accompanied on campus, in residence halls, and to classes by a psychiatric service dog trained to respond to anxiety attacks the student experienced as a result of post-traumatic stress disorder

**Table 1.** Comparison of Service Animal and Emotional Support Animal Characteristics and Regulations.

	Service Animals	Emotional Support Animals
Definition	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.	Provide necessary emotional support to individuals with disabilities, and alleviate one or more identified symptoms of a person’s disability.
Disability	Individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one or more major life activities.	Individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one or more major life activities.
What can be asked	Is this a service animal? What service/skill/task does the animal do?	The student is required to submit a letter from a mental health professional that addresses the question as to how the emotional support animal alleviates symptoms associated with their disability.
Type	Dog or miniature horse.	Any species of animal that is permitted under state law and local ordinances.
Training	Trained to perform tasks for the benefit of an individual with a disability.	None required
Where permitted	All places of public accommodation— campus buildings, residence halls, and anywhere on campus they are needed to assist an individual with a disability to participate in educational programs and other campus activities.	Residence halls Classrooms—case-by-case basis determination
Regulations	Must be under effective control at all times Follow all state laws and local ordinances	Must be under effective control at all times Follow all state laws and local ordinances

(Grieve, 2014). In *United States v. University of Nebraska Kearney*, a student diagnosed with depression and anxiety requested accommodation for the use of an ESA. The request was initially denied, but after the student sued, this decision was overturned with a ruling that included the university paying \$140,000. The university had to revise their rules to note that university housing is considered a “dwelling” and is therefore subject to the provisions of the FHA, meaning that ESAs were protected under disability status (Hutchens, 2014).

UCCs are seeing more students for more severe psychological issues (Gallagher, 2014), so it is not surprising that many schools are confronted with the new growing phenomenon of ESAs. For many, the topic is also a contentious one centered on whether students are taking advantage of the laws. Due to the growing attention and concern related to ESAs on campuses, the authors designed a survey to obtain information on the prevalence of requests for ESAs to UCCs, how UCCs handle these requests, and how UCC directors feel about ESAs on campus.

## Methods

An online survey was created in Survey Monkey addressing UCCs' perceptions and experiences pertaining to ESAs. The survey was designed, reviewed, and tested by the coinvestigators and their colleagues at Washington State University (WSU), New Mexico State University (NMSU), and Colorado State University (CSU) who provided feedback on content, navigability, survey questions and choices, and overall questionnaire design. The survey originated from CSU and received approval from the Institutional Review Board at CSU. It was then disseminated through the Association for University and College Counseling Centers (AUCCCD) listserv. AUCCCD is the international organization for counseling center directors comprised of universities and colleges from the United States, Canada, Europe, the Middle East, Asia, and Australia. A link to the online questionnaire and a request to participate in the study were e-mailed to all UCC directors and a reminder e-mail was sent 2 weeks later. The survey was available to respondents between February 23 and March 30, 2015, and all results were collected anonymously. After completion of the survey, results were downloaded into SPSS, version 16 (SPSS Inc., Chicago, IL) for data analysis.

The survey consisted of questions pertaining to the UCC directors' experiences related to ESAs. This included questions about how often their counseling center receives requests to write letters in support of students' needs for ESAs, how they handle these requests, and how they handle requests by students to diagnose a disability in order to obtain an ESA. They were also asked if their school or counseling center has any written policies about ESAs and, if there is a university policy, how much involvement the UCC staff had in its development. Finally, the survey asked participants to submit their policies, if they had one they wanted to share, as well as offer any additional comments.

## Results

The survey was e-mailed to directors of counseling centers at 737 institutions. It was not possible to determine how many e-mail addresses were undeliverable. A total of 248 respondents completed the study, thus yielding an estimated response rate of 33.6%; however, not all respondents answered every survey question. Data for each question was analyzed based on responses to that particular item.

The first question asked how often their counseling center receives requests to write letters to support students' needs for ESAs. The most common response was almost never (141, 56.9%), followed by several times a year (77, 31.05%), at least once a month (24, 9.68%), and more than once a week (6, 2.42%). The next several questions asked how their counseling

**Table 2.** UCC handling of Client Requests to Write Letters of Support for Emotional Support Animals.

Response	<i>n</i> (%)
Has in-house policy and seems to be working	42 (17.36)
Has no in-house policy and seems to be working	92 (38.02)
Has in-house policy and does not seem to be working well	5 (2.07)
Has no in-house policy and does not seem to be working well	11 (4.55)
Recommend other resources/referrals	92 (38.02)

center handles client requests to write letters of support for ESAs. UCC directors were asked if they had an “in house” policy, whether it was working, or if they were recommending other resources. The most common responses were not having an “in house” policy (92, 38.02%) or recommending other resources (92, 38.02%; see Table 2).

Written comments by those who said they recommended other resources indicated they felt it was outside their mission and either referred clients to resources for disabled students on campus or to off-campus resources such as a private practitioner for assessment of a disability. For those who indicated they have a policy, seven commented that their policy was to not write letters to support the use of ESAs. The majority of those who replied that they do not have a policy, indicated this was due to either a lack of requests or not feeling they had enough knowledge or expertise to write an appropriate policy.

The next question asked how their counseling center handles requests by students to diagnose a disability to obtain an ESA. The most common response was that their counseling center does not diagnose disabilities (117, 47.18%), with 73 (29.44%) indicating they diagnose disabilities on a case-by-case basis and specified that this appears to be working. Alternately, eight UCCs (3.23%) diagnose on a case-by-case basis but feel this system is not working, and 50 (20.16%) replied “other.” The comments from those who selected “other” most often stated they infrequently diagnose, typically only for longer term clients, and in the event they do diagnose, they tend to not support requests for ESAs. The comments from those who have an “in-house” policy generally reflected that their policy is to not make diagnoses. Of the handful that do make diagnoses, most reported they do not write letters of recommendation for accommodations, including the use of ESAs. Four counseling centers wrote comments indicating they do diagnose and recommend ESAs, but these schools were in the minority.

Lastly, when asked if they would be willing to share any policies they currently had, 174 (81.3%) reported they have no current policies. The remainder indicated they were willing to share. Some schools sent URLs to their policies, others attached them or wrote a few sentences explaining their policies (these policies available by request by first author).

When reviewing the general comments, a few themes were readily apparent. One reoccurring theme came from centers that didn’t have experience

with requests for ESAs. These individuals noted that they had heard of these requests being a potential cause of concern, but as of yet, they had not experienced it at their school. The other theme came from those who had experienced requests for ESAs. While a minority of these centers felt they had policies in place to adequately handle this need, the vast majority reported feeling concerned and anxious about this growing issue. Upon reviewing the written comments, it became apparent that for most schools, it does not take a large number of these requests to become an area of concern, and subsequently, ESAs on campus could create a larger issue that would require a great deal of time, energy, and attention. Comments included a large number of requests for guidance in creating appropriate policies to help guide their counseling centers through this new challenge.

## Discussion

There has been an increase in research highlighting the therapeutic benefits for individuals with physical or psychological challenges in their interactions with animals. As a result, UCCs could potentially see an increase in the number of students seeking ESA letters of support allowing them to have their pet with them in campus housing. The results of this study suggest that most schools have had few, if any requests for letters of support for ESAs. Approximately only a third of UCCs reported receiving requests for support letters at least several times a year, yet most reported they currently have no written policies in place or that they recommend other resources or make outside referrals. When asked how they handle requests for a diagnosis to obtain an ESA, nearly half of all UCCs report that they do not offer any disability diagnoses, including those that would include a recommendation for an ESA.

Yet, regardless of how many ESA requests counseling centers had received, the survey comments suggest that many counseling center staff members feel anxious and uncertain around the topic. The responses suggest that even a limited number of requests for ESAs can cause a fair amount of stress on student affairs offices, including housing, UCCs, and services for disabled students. Furthermore, most schools desire some guidance and support in the development of general guidelines for ESAs. Without these, many counseling center staff members are feeling unsure about how best to respond to requests for ESA letters of recommendation or a diagnosis that will support the use of an ESA.

Some general guidelines for those who do write letters of support for ESAs appear warranted because the most important letter a patient may obtain regarding a service or assistance animal will often be from a medical or mental health professional. As Ensminger and Thomas (2013) explain, writing a letter of support for an ESA should not be taken lightly. If a request is

denied, the letter could become part of the client's evidence/case and the college counselor might be called on to justify the contents of the letter. Furthermore, it is suggested that counselors should not write letters unless they can say that the animal in question can actually provide or is providing some benefits to the patient. Therefore, it is important that counselors writing these letters are familiar with the literature and research documenting the impact of animals in helping with psychological issues; however, our personal experiences indicate that most counselors have limited knowledge in this area. They should not claim an animal can "cure" anything nor make claims of benefits that extend beyond actual benefits the animal can provide. Furthermore, a counselor should understand that although other individuals may have superior expertise in dog training, letters are seldom sought from trainers and, when a matter comes to court, it is the counselor who will likely have to provide expert testimony and not a dog trainer (Ensminger & Thomas, 2013).

### ***Suggestions for campus guidelines***

Considering the issues outlined previously, the following are some general guidelines to help schools create their own ESA policies. These guidelines are based on an examination of the policies of contributing UCCs.

Each policy should begin by establishing a common language, encompassing the general definitions of the terms disability, service animal, and emotional support animal. The definition of a disability should adhere to the generally accepted ADA guidelines. When defining the term "service animal" it is important to remember that under the ADA, institutions do not have the ability to require that students requesting a service animal submit documentation of the disability or the disability-related need for the service animal. Also note that there are some state by state variations in whether or not an individual with a disability is permitted to have a service-animal-in-training in public places including campus housing and classrooms. Alternatively, when a student requests to have an ESA in campus housing, the institution is able to request information to verify that the student meets the definition of disability as defined by the Fair Housing Act (FHA), as well as documentation of the relationship between the person's disability and the need for an assistance animal accommodation. All associated state laws, county and city codes will need to be honored relative to animal vaccinations, leash requirements, and so forth.

Once the background definitions are established, the next element of a policy should include the general views or rationale of the university pertaining to ESAs. This section is where veterinary and science faculty members should consider adding a statement regarding animals in the classroom explaining how these rules apply to their specific educational

situations. This is particularly important in courses that have labs where hazardous chemicals are being used, or where the working animal might disturb or compromise safety due to patient or teaching animals in barns, wards, and so forth. Universities should update their policies about assistance animals on campus to ensure they meet federal and state requirements. The counseling center should have a voice in the creation of these policies if the UCC will be involved in writing letters on behalf of students. Schools might want to create a policy committee composed of multiple individuals involved with assistance animals as well as other animals on campus. The following should be considered for inclusion on the committee: university general counsel, accessibility services (for students and employees), the office that addresses discrimination complaints, the counseling center, campus police, representatives from colleges that utilize animals on campus for academic purposes such as agricultural colleges, entities on campus that utilize animal assisted interventions such as the campus health center, and departments that utilize animals for research purposes. Once this committee creates the policies regarding assistance animals and ESAs on campus, a similarly composed group could be identified to act as a consultative body for faculty, staff, and students who make requests that are outside the realm of existing policies.

An FAQ sheet about ESAs might be included in the guiding document. Depending on the institution, it could also be helpful to list guidelines and specific university policies. A document outlining the pros and cons of having an animal on campus could also be considered for inclusion in this section. It is also suggested that this is an opportunity to help potential ESA owners to think about the best ESA for their needs. If a student already has an animal he/she feels is providing the support needed, this might be advisable rather than selecting a new animal. Additionally, if a student has more experience with one species (e.g., canine or feline) than another, this might be the best choice for an ESA.

After establishing the definitions and guiding principles, it is helpful to explain how students may qualify for an ESA. This section should be written in the first person to make the requirements clear to students. This section should take existing laws and requirements into account. The first step to obtaining an ESA for college students is securing documentation that addresses three factors:

- (1) The student has a disability that limits them in at least one major life activity as defined under state and federal law. An impairment is substantially limiting if a student is unable to perform an activity as compared to an average student in the general population. Factors that should be considered in determining whether a student's impairment substantially limits a major life activity include nature, severity,

duration and permanent or long term impact, or expected impact. These three factors must be considered because, under the ADA, it is not the name of the impairment or condition that determines whether a person is protected by the ADA, but rather the effect of the impairment on the life of the person.

- (2) An ESA is necessary to create an equal opportunity within the college setting; specifically that the student can demonstrate that an ESA is necessary to have equal access to and use of campus housing.
- (3) The ESA is a reasonable, justifiable accommodation for the stated disability. This means that if deemed reasonable, modifications in rules, policies, practices, or services should be made that are necessary for a person with a disability to have an ESA in on-campus housing (Hutchens, 2014).

One example of an impairment which may substantially limit major life activities, even with the help of medication or aids/devices, is mental illness (Department of Health and Human Services, Office of Civil Rights, 2006). Universities, similar to other housing providers, can ask students who have disabilities that are not readily apparent to submit documentation of their need for accommodations from a reliable source, such as a doctor or other health professional (e.g., social worker, psychologist, etc.) who can substantiate existence of a disability and the disability-related need for an assistance animal (Office of Fair Housing and Equal Opportunity, 2013).

If these requirements are met, schools are expected, as specified under the requirements of the FHA and Section 504 of the Rehabilitation Act, to provide accommodations (Hutchens, 2014). Both the Fair Housing Amendments Act of 1988, and Title II of the ADA state that a public entity must modify its policies and procedures to permit the use of a service animal by an individual with a disability (Americans with Disabilities Act Title II Regulations, 2010; Fair Housing Act of 1968, amended in 1988). Since the Fair Housing Act applies to residence halls, colleges and universities must make reasonable accommodations for persons with disabilities requiring service animals or ESAs in campus housing. This will ensure that all qualified individuals are allowed full participation in the institution's programs or activities, including access to residence halls (Title VIII: Fair housing and equal opportunity, 2007).

The counseling center's role in the process of providing documentation may vary. They can decide whether or not they are willing to diagnose disabilities and write letters. At the same time, students can be diagnosed by another professional with a condition that constitutes a disability as defined by ADA (i.e., depression, anxiety, post-traumatic stress disorder, etc.). If a UCC does not want to be responsible for diagnosing a disability, then the Center should consider not

providing formal diagnoses for any of their clients that would be noted in clients' written clinical records. Consequently, diagnoses in the clinical record could have the potential of being viewed as evidence of a disability which could later be used as legal documentation.

Regardless of the source of the students' supporting documentation, institutions need to establish a clear policy for how the requests for ESAs will be handled. This section should include information on where and to whom the students should submit their ESA-related documentation. Institutions may also choose to include additional rules/regulations about ESAs in this section of their policy documents. When drafting this section, it is important to note that while many people may choose to have a vest or tag signaling that their dog is a working dog and should not be disturbed while on duty, ADA makes it clear that service animals are not required to wear any type of identification indicating their role. All service animals and ESAs are required, however, to wear any identification tags required by state and local laws/codes.

It is also suggested that it would be helpful to university housing staff and first responders (police, emergency medical service) for students with ESAs or service dogs to voluntarily place some type of identification on the door of their dorm room or apartment indicating the presence of a service animal or ESA on the premises.

To ensure appropriate arrangements can be made in case of emergency, the university should have a system specifying how an animal will be cared for if its handler becomes incapacitated (hospital, jail, etc.). This might include a requirement that students provide the names of emergency contacts who will take responsibility for the animal during times of need.

On a broader level, it could be helpful to post expectations of faculty, staff, students, and other members of the university community about how to interact with service animals. This section should also provide background for policies on conflict resolution. At a minimum, institutions should have clearly defined protocols for handling concerns about the ESA from allergic or fearful students, as well as a description of the circumstances under which an ESA can be removed from campus.

These policy elements have been created by synthesizing numerous written policies from schools throughout the United States. These include institutions that participated in the study and numerous others who have posted their policies online. We would like to thank all the UCCs that contributed to these examples.

## Conclusion

Animals are part of the growing list of accommodations many students are requesting while at school. Understanding the different types of service and assistance animals, and what rules and regulations exist for each type, is becoming increasingly important for schools to ensure they are following

legal mandates while at the same time not jeopardizing the safety of other students or the efficiency of their educational programs. Schools that proactively create policies and procedures to help faculty, staff, and students all better understand this complex issue is likely to be rewarded with smoother interactions and ultimately better results when faced with ESA requests.

## Acknowledgment

We would like thank all the college counseling centers and faculty/staff who participated in this survey and shared their current policies and procedures. We also want to acknowledge and thank all those who have posted their policies online. Examples of a compilation of these policies are available upon request.

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