



ANIMALS AS ACCOMMODATIONS IN THE JOB CORPS PROGRAM

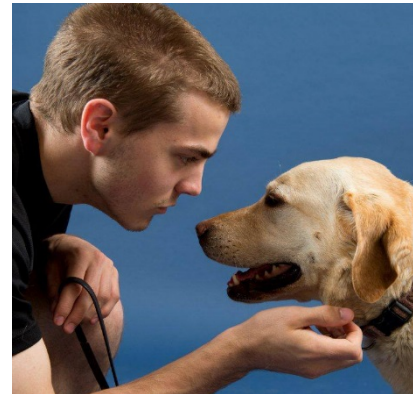
AUGUST 2014

Table of Contents

What are service and comfort animals? _____	2
What are some tasks service animals may perform for a person with a disability? _____	2
Are students able to have service or comfort animals while enrolled in Job Corps? _____	3
What kind of documentation can be requested related to a service or comfort animal? _____	3
Can a center recommend the denial of a request for a service or comfort animal? _____	4
Who is responsible for taking care of and monitoring the service or comfort animal? _____	5
What questions should be considered by the RAC? _____	6
What if other students or center staff are allergic to the service or comfort animal? _____	8
When may a service or comfort animal be excluded? _____	8
Is there information/training available to teach staff/students about interacting appropriately with service or comfort animals? _____	9

What are service and comfort animals?

A service animal is a dog that is individually trained to do work or perform tasks for a person with a disability. On a limited case-by-case basis, a miniature horse that has been similarly trained may also qualify as a service animal. The work or task the service animal has been trained to provide must be directly related to the person's disability.



Comfort animals provide emotional support to a person with a disability, but are not individually trained since their function is to be there, not to do a task. These animals do not meet the definition of service animal. Comfort animals are often used as part of a medical treatment plan as therapy animals. These animals provide companionship, relieve loneliness, and sometimes help with depression and certain phobias, but do not perform tasks that assist people with disabilities. They do not have special training to assist the person's disability like service animals.

What are some tasks that service animals may perform for a person with a disability?

Examples of tasks that a service animal may perform include, but are not limited to, pulling a wheelchair, fetching items, reminding a person with mental illness to take prescribed medications, or assisting someone during a seizure.



Examples of tasks that a service animal may perform include, but are not limited to:

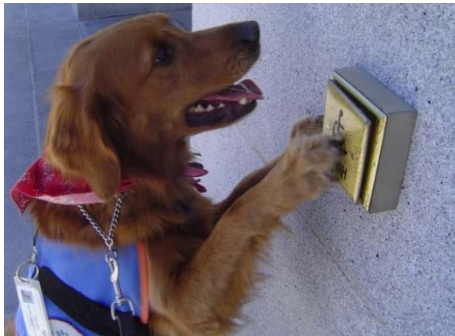
- Guiding people who are blind
 - Alerting people who are deaf (e.g., when there is a knock at the door)
 - Reminding people with psychiatric disabilities to take medicine
 - Interrupting self-mutilation for people with dissociative identity disorders
 - Providing safety checks, or room searches, or turning on lights for people with post-traumatic stress disorder
-

- Distracting repetitive movements for people with autism (e.g., hand flapping)
- Assisting people with a seizure disorder (e.g., stand guard over the person during a seizure, go for help or predict a seizure and warn the person in advance to sit down or move to a safe place)



Are students able to have service or comfort animals with them while enrolled in Job Corps?

Job Corps students who require a service or comfort animal should make this request via the reasonable accommodation request process. This process is outlined in Appendix 605. Requests for service or comfort animals will be assessed on a case-by-case basis by the center's Reasonable Accommodation Committee (RAC). Consideration will be given to the type of animal and the functions it performs. Center staff members who need assistance with decisions should contact their Regional Disability Coordinator.



What kind of documentation can be requested related to a service or comfort animal?

In the case of a service or comfort animal, if the disability is not obvious and/or the reason the animal is needed is not clear, then documentation may be required to establish the existence of a disability and how the animal will help the student in Job Corps. Center Disability Coordinators (DCs) need to be aware that sometimes reasonable documentation is not always going to be from a doctor or some other health care professional. In the case of a service animal, the documentation may come from whoever provided the training. The goal of the DCs should be to understand the reason the service or comfort animal is needed and what it does for the student.

Requiring reasonable documentation of the need for a service or comfort animal may help reduce the number of requests from students who have no actual need for service or comfort animals.

Since there could be lots of different kinds of distractions and activity in the Job Corps environment, the center can require that the service or comfort animal be fully trained and

capable of functioning appropriately, not just for the student with the disability, but also in terms of the center environment. A student who trained his or her own service or comfort animal needs to be able to document or demonstrate (e.g., have the applicant come to center for a RAC meeting to make sure s/he understands the center environment and what will be required from the student and the service or comfort animal) that the service or comfort animal is in fact trained and will not be disruptive on center. It will not be enough for the student to present a prescription or a letter from their doctor stating that they require the animal while in Job Corps.

Can a center recommend the denial of a request for a service or comfort animal?

Each request should be evaluated on a case by case basis. The process of recommending denial of an accommodation request is outlined in Appendix 605. The DCs should contact their Regional Disability Coordinator if considering recommending the denial of a request for a service or comfort animal.



Autism Dogs: Trained to apply deep pressure by lying on the individual or pressing on certain areas of the body.

Recommending the denial of a request for a service animal would be extremely rare. In general, the center would be expected to grant an accommodation request for a service animal if:

- a. The student's disability and the service animal's function are related;
- b. The service animal will improve the student's ability to perform in the Job Corps program;

- c. The animal has had sufficient training to not be a disruptive presence on center (e.g., constant barking, the student cannot control the animal, the animal shows any signs of aggression); and
- d. The accommodation does not present an undue hardship.

Recommending the denial of a request for a comfort animal is more of a grey area. Since the function of a comfort animal is to be there and not perform a task, there may be alternate accommodations or case management that may be equally effective in managing the disability/functional limitation. The applicant/student interview as part of the RAC meeting will be critically important in these cases, as it will be important to know how the disability is impacting the student and how the comfort animal is assisting.

Who is responsible for taking care of and monitoring the service or comfort animal?

The student is responsible for the care and monitoring of the animal. The student should do everything possible to maintain appropriate health and grooming of their animal. The center can discuss these issues with the applicant/student and should expect that the service or comfort animal:

- Is in good health;
- Is current on all vaccinations required by law;
- Is appropriately licensed as required by state or local law;
- Will behave in a non-aggressive manner at all times (e.g., no jumping, growling, snarling, biting or snapping);
- Is within the student's control at all times, either by means of a leash, containment (e.g., crate) or voice command;
- Is housebroken;
- Is clean (e.g., grooming/bathing and flea prevention as needed);
- Is not disruptive at any time (e.g., barking, whining during training day or in dormitory); and



- Has adequate supplies (e.g., food, bedding, toys, dishes or other supplies).

What questions should be considered by the RAC?



Because a service or comfort animal will likely impact all areas of the center, managers from most areas of the center should attend the RAC meeting and the applicant/student is always required to be part of the meeting. When the request is made during the admissions process, it is critically important that this meeting take place prior to the applicant's arrival on center to ensure all necessary accommodations are in place and the center and student have the same expectations for the care and management of the animal in the Job Corps environment. This will allow for a smooth transition and help to avoid any unexpected issues.



During the RAC meeting, it is important to discuss behavior expectations, the details of how the service or comfort animal will be cared for and monitored and any accommodations that will be needed to allow the student to tend to these necessary tasks. Other specific accommodations that are needed by the student should also be discussed. This meeting should be well documented, and an accommodation plan should be created for the student. The center may want to consider developing a plan of what was agreed to as far as care, behavior, and monitoring related to the animal. Sample plans are available from your Regional Disability Coordinator. This will help ensure center staff and the student are clear about the expectations and responsibilities of everyone and allow for focused discussion should any issues arise.

The following are some questions to consider by the RAC.

- Why is the service or comfort animal needed? What does it do for the student?
- Discuss the center environment. Ask the applicant/student to discuss how the animal has been trained and if this training will allow the animal to work and live in the Job Corps environment? Ensure the student understands that the animal cannot be disruptive.
- Is the animal current on all vaccinations required by law?

Good solutions will need to be worked out on a case-by-case basis. The center must engage the applicant/student in an interactive process to determine accommodation needs as outlined in Appendix 605. The request does not necessarily need to be granted, but the center must follow the process to see if the request could be reasonable. This process should be well documented, particularly when a request is being sent to the Regional Office for review because it is being recommended for denial.

- Is the animal appropriately licensed as required by state or local law?
- Is the animal housebroken? Is there a specific relief area for the animal? Is the student responsible for clean up? The student can be required to clean up after the animal, unless they are unable to do so because of a disability. Does the center need to make accommodations that allow the student to tend to the animal (e.g., allowing the student to leave the dormitory earlier or later than is typical to take the animal outside to relieve itself).
- When and where the dog will be exercised?
- When and where the animal will be fed and watered?
- Where will the supplies for the animal be stored?
- How will the grooming needs of the animal be met?
- When and where the animal will be with the student? How will the animal be secured if there are times when the animal will not be with the student? Generally service animals will always be with their handler so this issue will more likely need to be resolved when a comfort animal is being requested. For example, if the student is attending a college program off center and has an comfort animal, this animal will not be allowed to accompany the student to class as colleges are covered by a different federal law that does not allow comfort animals on campus (service animals are allowed).
- Is it an option for the student to have a private room? If not, how will roommates be chosen and introduced to the animal?
- Should preferential seating be considered in the classroom (e.g., near door or out of high traffic area)?
- Should a pass be considered for the student (e.g., leave class 5 minutes early, arrive at lunch early, use of elevator, etc.) to avoid high traffic areas as possible?



What if other students or center staff are allergic to the service or comfort animal?

- Try to keep the animal and staff/students who are allergic in different areas of the building and establish different paths of travel for each employee
- Provide the student with a private room, when possible
- Use a portable air purifier
- Avoid use of common areas at the same time
- Ask the student if s/he is willing to use dander care products on the animal and bathe it regularly
- Ask the student/employee who is allergic to the animal if s/he wants to, and would benefit from, wearing an allergen/nuisance mask
- Add HEPA filters to the existing ventilation system
- Have areas where the animal is present - including carpets, walls, and window treatments - cleaned, dusted, and vacuumed regularly



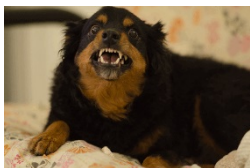
Staff or students claiming allergies or phobias so severe that they cannot be around the animal should present medical documentation to this effect. For more information on service animals and allergies, visit

<http://askjan.org/corner/vol02iss01.htm>.



When may a service or comfort animal be excluded?

A service or comfort animal may no longer be allowed if the student does not provide appropriate care for the animal, if the animal is out of control and the student does not take effective action to control it, if the animal is not housebroken, or if the animal poses a direct threat to the health and safety of others. In the event that the service or comfort animal is excluded, the student who uses the animal should be allowed to remain in Job Corps and may suggest alternative accommodations in lieu of the excluded animal.



Is there information/training available to teach staff/students about interacting appropriately with service or comfort animals?

The following materials may be helpful in teaching staff/students how to interact appropriately with a service or comfort animal.

Entity	Resource	Contact
Pet Partners	"Facts You Should Know About Service Dogs" Brochure	http://www.petpartners.org/document.doc?id=239
	"Service Dog Etiquette" Handout	http://www.petpartners.org/document.doc?id=231
	Video Overview of the Pet Partners Program	http://www.youtube.com/watch?v=BCX XxfVCA6Y
Guide Dog Foundation	Etiquette and Guide Dogs information, this page also links to other resources including resources for students, teachers and researchers, brochures, newsletters and a video are available	http://www.guidedog.org/content.aspx?id=1416
PETJOY	Proper Service Dog Etiquette	http://www.petjoyonline.com/proper-service-dog-etiquette/
Center for Independent Living	Your local center for independent living may have a community resource that would provide the center training related to service or comfort animals.	http://www.virtualcil.net/cils/