

EMOTIONAL SUPPORT ANIMAL ACCOMMODATION: POLICY & PROCEDURE

Reinhardt University and the Academic Support Office (ASO) provide reasonable accommodations to individuals with disabilities and complies with all laws related to the Fair Housing Act as it relates to Emotional Support Animals.

A. DEFINITIONS

1. OWNER

Owner is an RU student who requests an accommodation to reside with an Emotional Support Animal in RU's student housing facilities. For purposes of this policy, the term owner, student, and/or individual all apply to the RU student requesting an accommodation to reside with an Emotional Support Animal in RU housing.

2. ANIMAL TYPES RECOGNIZED BY RU

RU recognizes different animal types on campus. Animals that provide owners with support and assistance are recognized as either a Service Animal (SA) or as an Emotional Support Animal (ESA), both defined below. These two types of animals are not pets.

a. **EMOTIONAL SUPPORT ANIMAL:** Under the Fair Housing Act (FHA), an ESA is a companion animal that provides therapeutic benefit to an individual with a disability. Because an ESA is not individually trained to perform a specific job or task, an ESA is not a SA and is therefore only permitted in the owner's on-campus residence. An owner may only request/reside with one ESA. No ESA may be kept in RU student housing at any time prior to the owner receiving approval from the Learning Support Office.

b. **SERVICE ANIMAL:** The Americans with Disabilities Act (ADA) and the Department of Justice define a SA as a dog that is individually trained to do work or perform tasks for people with disabilities. The work or task(s) the dog has been trained to provide must be related directly to the person's disability. Examples of such work/tasks include guiding a person who is blind, pulling a wheelchair, or alerting a person who is diabetic about blood sugar levels. SA is not the same as an ESA (see above). A SA is a working animal, not a pet. Other animal species, whether wild or domestic, trained or untrained, are not a SA. An owner with a SA is permitted to be accompanied by his/her SA in all areas of RU where members of the general public, program participants, clients, customers, patrons, or invitees are allowed to go or as the activity pertains to curriculum or employment responsibilities. Owners residing in RU housing must register their SA with the Academic Support Office.

B. FACTORS OF CONSIDERATION FOR ESA REQUESTS

RU may consider the following as evidence in determining whether the presence of an ESA is a reasonable and necessary accommodation and/or in the housing assignment process for individuals with an approved ESA:

1. The size of the animal as relative to the owner's assigned housing space;
2. The animal's presence and whether it will force another individual from housing (e.g. serious allergies);
3. The animal's presence and whether it will violate individuals' right to peace and quiet enjoyment;

4. Whether or not the animal is housebroken or if it is unable to live with others in a reasonable manner;
5. The animal's vaccination history; and/or,
6. Whether the animal poses or has posed in the past a direct threat to the safety or health of the owner or others. This may include aggressive behavior towards or injuring the owner or others, the potential transmission of zoonotic diseases, or if the animal causes or has caused excessive damage to housing beyond reasonable wear and tear.

C. PROCESS TO REQUEST AN ESA AS A DISABILITY ACCOMMODATION

Owners should submit an accommodation request for an ESA as early as possible before the start of the term for which the request is being submitted. RU will review and consider such requests at any time; however, if the request for an ESA accommodation is made fewer than 60 days before the individual intends to move into RU housing, RU cannot guarantee that it will be able to meet the individual's accommodation needs during the first semester or term of occupancy. If the need for the accommodation arises when an individual already resides in RU housing, the owner should contact the **Academic Support Office** as soon as practicably possible. RU cannot guarantee that it will be able to meet the accommodation needs during the semester or term in which the request is received.

1. Student submits a written request for an ESA accommodation to ASO. When the student's disability(ies) is not otherwise apparent, the request must be accompanied by documentation from a **licensed health care provider** (LHCP) and qualifying veterinary records, defined below. The documentation must be presented by the LHCP treating the condition for which the ESA is needed, be presented in letter format on the LHCP's letterhead, and include and demonstrate the following:
 - a. The LHCP's name, credentials, contact information, and dated signature
 - b. The owner has a disability, as defined by ADA, and the associated symptoms
 - c. Which major life activity(ies) the disability impacts in a housing environment
 - d. The necessity for the ESA in order to provide the owner equal opportunity to use and enjoy campus housing
 - e. A clear explanation of the nexus, or relationship, between the assistance the animal provides and the documented disability –specifically, how will the ESA mitigate the symptoms presented by the disability
For guidance on documentation requirements, owners should provide their LHCP with the ESA Documentation Requirements and Guidelines. Documentation can be submitted either in-person, by email to AAA@reinhardt.edu, or by fax at 7707205602
2. Submit current veterinary records to the Academic Support Office. Vet records must demonstrate that the animal is in good health and has current vaccinations against diseases common to that breed of animal as recommended by the **American Veterinary Medical Association**. Receipts for recent visits typically do not address the current health of an animal. Owners should speak to the veterinary office about additional records that qualify. Vet records can be submitted either in-person, by email to AAA@reinhardt.edu, or by fax at 7707205602.

3. As documentation and/or vet records are received, the Academic Support Office will review and update the owner via email with next steps in the process, which may include a meeting or a request for more information.
4. If the medical documentation and vet records provide enough information for the Academic Support Office to determine the accommodation is necessary, a staff member in the Office will contact the owner to schedule a meeting, which can be facilitated in-person, via video conference, or via telephone. The purpose of this meeting is to review campus-wide policies that apply to an ESA. The owner will also review and sign the **ESA Community Standards & Expectations Agreement** at this time.
5. If the medical documentation and/or vet records are lacking sufficient information for the Academic Support Office to determine whether the accommodation is necessary, a staff member in the Office will inform the owner in writing of the documentation's insufficiency within 7 business days of receiving the documentation, and may request additional information, including speaking directly with the individual supplying the documentation.
6. After meeting with a staff member in the Academic Support Office to review the **ESA Community Standards & Expectations Agreement**, the Academic Support Office, in consultation with the Residence Life Office will notify the owner via email of a final decision within 5 business days of the meeting. The owner will also get a letter of accommodation that shows that the animal has been approved as an accommodation. If approved, the owner will be required to meet with a Residence Life Office staff member to review the agreement and expectations before bringing the ESA to their RU residence.
7. Owners may appeal any decision directly to the Vice President for Student Affairs within 5 business days of receiving the final decision notification from the Academic Support Office.