

Policy Number	TBD
Policy Title	Service and Assistance Animal PSOM Guidelines and Procedures
Effective Date	September 19, 2023
Last Revision Date (if any)	N/A
Scope	All (Faculty, Students, Staff, Housestaff)
LCME Element(s) (if any)	N/A

## Service and Assistance Animal PSOM Guidelines and Procedures

### I. PURPOSE

The University of Pennsylvania (the “University”) and the Perelman School of Medicine (PSOM) recognize that Service Animals and Assistance Animals provide individuals with disabilities enhanced autonomy and independence. PSOM will comply with all University rules and guidelines unless otherwise indicated. The University has established the following guidelines regarding Service Animals (including Service Animals in training) and Assistance Animals to assist people with disabilities. Set forth below are specific requirements and guidelines concerning the appropriate use of and protocols associated with Service Animals and Assistance Animals. Pets and non-research animals are otherwise restricted on University property. These Guidelines are meant to be read in conjunction with the University Housing Accommodations Guidelines and the PSOM policy. PSOM and the University reserve the right to amend these guidelines as they deem necessary.

### II. SCOPE

All (Faculty, Students, Staff, Housestaff)

### III. POLICY

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## Section I. Definitions

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### **A. University Housing Accommodations Guidelines**

- University guidelines regarding accommodations in University housing to assist students with disabilities.

### **B. Service Animal**

- A dog or miniature horse that has been individually trained to do work or perform tasks for the benefit of an individual with a disability. All other types of animals do not qualify as Service Animals.
- The work or task a Service Animal has been trained to provide must be directly related to the person's disability. Examples of such work or tasks conducted by a Service Animal include but are not limited to:
  - Guiding people who are blind
  - Alerting people who are deaf
  - Pushing or pulling the wheelchair of an individual with limited mobility
  - Alerting and protecting a person who is having a seizure
  - Reminding a person with psychiatric condition to take prescribed medications
  - Sensing that a person with Post Traumatic Stress Disorder (PTSD) is about to have an anxiety attack and taking a specific action to help avoid the attack or lessen its impact.
- Dogs whose sole function is to provide comfort or emotional support are not Service Animals, but may qualify as Assistance Animals (refer to Assistance Animals section below for further information).

### **C. Assistance Animals**

Animals that provide emotional support which alleviates one or more identified symptoms or effects of a person's disability.

- 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, once approved, are permitted in University housing or residence halls.
- Assistance Animals are not permitted in other areas of the University or medical and research buildings (e.g. libraries, academic buildings, classrooms, labs, student center, dining halls, etc.)

### **D. Service Animal in Training**

- Individuals qualified to train Service Animals to aid and guide persons with disabilities are generally afforded the same rights as those individuals who require the assistance of a Service Animal.
- If you are training a Service Animal, you must contact Student Disability Services and comply with the requirements set forth in these guidelines.

### **E. Pet**

- An animal kept for ordinary use and companionship.
- A pet is not considered a Service Animal or an Assistance Animal. Pets are prohibited in University or medical buildings by these guidelines.
- Residents are not permitted to keep pets, other than fish, on University property or in University housing.

### **E. Approved Animal**

- Service Animal or Assistance Animal that has been approved as a reasonable accommodation under these guidelines.
- Students who wish to seek accommodation approval should contact the [Weingarten Center Disability Services](#).

### **F. Owner**

- Individual with a disability who has requested the accommodation and has received approval to bring the “Approved Animal” on University property.

## **Section II. Approved and Restricted Areas on University Property**

### **A. Service Animals**

- Service Animals are generally permitted throughout campus. Assistance Animals are allowable in University housing only.
- However, the University may prohibit the presence of Service Animals in certain locations due to health and safety restrictions (e.g. where the animals or patients may be in danger, or where their use may compromise the integrity of research or patient care.)
  - Restricted areas may include, but are not limited to: custodial closets, boiler rooms, facility equipment rooms, research laboratories, classroom laboratories, classrooms with research/demonstration animals, areas where protective clothing is necessary, wood and metal shops, motor pools, rooms with heavy machinery, and areas outlined in state law as being inaccessible to animals.
  - Other areas may include all spaces where clinical encounters may occur, including all classroom and common spaces in the Jordan Medical Education Center (JMEC) and all campus medical and research buildings.
- Service Animals may be granted access to restricted areas on a case-by-case basis by contacting Disability Services and the appropriate department representative.
- In general, Service Animals are not allowed in clinical spaces unless specific accommodation has been granted by the [Weingarten Center](#).

### **B. Assistance Animals**

- Approved Assistance Animals are only permitted in privately assigned living space in University housing.
- Approved Assistance Animals are prohibited from all other University property without prior authorization from Disability Services.

### **Section III. Information and Responsibilities for Faculty, Staff (including all Housestaff), and Students**

- Information regarding disability is considered highly confidential, is maintained in separate, secure files with limited access, and is only shared on a need-to-know basis. Authorizations for Approved Animals used for disability-related accommodations are made based on medical and/or mental health documentation and the situation at hand, and are not subject to challenge by third parties.
- Service Animals are permitted to accompany their Owners at all times and in all places on campus, except where specifically prohibited due to health and safety restrictions.
- Faculty, staff or other students may not request or require proof that the Service Animal has been certified, trained, or licensed as a service animal. Per federal guidelines, we may not make any inquiries about a Service Animal when it is readily apparent that an animal is trained to do work or perform tasks for an individual with a disability (e.g., the dog is observed guiding an individual who is blind or has low vision, pulling a person's wheelchair, or providing assistance with stability or balance to an individual with an observable mobility disability).
- When the task or work a Service Animal provides is not obvious, only limited inquiries are allowed. Staff may ask two questions:
  - Is the dog required because of a disability? (only if the disability is not visibly apparent)
  - What work or task has the dog been trained to do?
- Contact Disability Services at [vpul-sds@mail.pobox.upenn.edu](mailto:vpul-sds@mail.pobox.upenn.edu) or 215-573-9235 should you have any questions or concerns relating to any Service or Assistance animal.
- Report animals exhibiting aggressive behavior or Owners who are not maintaining control of their Approved Animals to Disability Services at [weingartenlrc@vpul.upenn.edu](mailto:weingartenlrc@vpul.upenn.edu) or 215-573-9235. It is important to include the name of student (if known), time, date and location in addition to a general description of the concerning behaviors. Contact Public Safety at 215-573-3333 to report animals who are threatening or have injured someone or another animal.
- If you have a conflicting health condition with an Approved Animal, e.g., you are a student who is assigned to University housing with an Owner who has an Approved Animal, refer to [Section IX](#) for further information.

#### **Section IV. University Housing Service Animal Approval Process**

Students planning to bring their Service Animals to reside in University housing are required to follow the procedures outlined below:

- Students seeking permission to keep a Service Animal in University housing may submit the Service and Assistance Animal Registration Form (forthcoming via the Weingarten Center) online or make a verbal request, which can be done over the phone or in person at the University's office of Disabilities Services ("SDS"), so that the student can be assigned to the most appropriate housing location with their Service Animal, considering the student's needs and preferences. Students do not need to submit a Request for Housing Accommodations Form unless they are requesting additional housing accommodations from the University. Requests for Service Animals in housing do NOT require documentation of disability; however, a submission of a Service and Assistance Animal Registration Form is required so that the Service Animal can be appropriately registered.
- Recommended Timelines: SDS will consider all requests, whenever they are made. Students will not be denied a request to have an Approved Animal on campus simply because they have not submitted their request in accordance with the recommended timelines. This said, The University provides the suggested timeframes below, as students who apply for a reasonable accommodation for residential and housing services in the timeframes below have the best chance of availability for Approved Animals with respect to their request:
  - Freshman: July 1
  - Upper Class Students: May 1
- Students seeking permission to keep a Service Animal in University housing will be required to resubmit to SDS the Service and Assistance Animal Registration Form each academic year, so that the University can track accommodation requests and Approved Animals in each of the University housing locations. If a student has had a Service Animal registered in the past, SDS should provide historical deference to that fact.
- Submit Required Documentation of good health as follows:
  - Clean Bill of Health: Owners must obtain documentation of the Approved Animal's clean bill of health from a licensed veterinarian. Acceptable documentation is a veterinarian's statement certifying that the animal is in good health and that all required vaccinations are up to date.
  - Vaccination: In accordance with local ordinances and regulations the animal must be immunized against diseases common to that type of animal. Dogs must have current vaccination against rabies and wear a rabies vaccination tag. Cats must have a current vaccination against rabies.
  - SDS must receive the annual documentation of good health at the time of the request to have a Service Animal in University housing

Upon approval of a Service Animal, the appropriate residential building staff will be notified. The student's roommate(s) or suitemate(s) will be notified (if applicable) to notify them that the Approved Animal will be residing in shared assigned University housing living space.

If the function performed by the animal does not constitute the performance of a task or work, the animal will be treated as an Assistance Animal, subject to the requirements of the Assistance Animals section below.

Once an Owner is approved, the Owner's housing assignment and community considerations will be confirmed by Residential Services.

Submit signed copy of these **Service and Assistance Animal Guidelines and Procedures** confirming understanding of the responsibilities, guidelines and procedures for having an Approved Animal in University housing.

## **Section V. University Housing Assistance Animal Approval Process**

Assistance Animals are only eligible for approval as a reasonable accommodation for students with a disability. Students planning to bring their Assistance Animals to reside in University housing are required to follow the procedures outlined below:

- Students seeking permission to keep an Assistance Animal in University housing may submit the Service and Assistance Animal Registration Form online or make a verbal request over the phone or in person. In addition, the student must submit documentation of their disability as outlined below, provided the disability is not readily apparent. Students do not also need to submit a Request for Housing Accommodation Form unless they are requesting additional housing accommodations from the University.
- Recommended Timelines: The University's Office of Student Disabilities Services ("SDS") will consider all requests, whenever they are made. Students will not be denied a request to have an Approved Animal on campus simply because they have not submitted their request in accordance with the recommended timelines. This said, The University provides the suggested timeframes below, as students who apply for a reasonable accommodation for residential and housing services in the timeframes below have the best chance of availability for Approved Animals with respect to their request:
  - Freshman: July 1
  - Upper Class Students: May 1
- Students seeking permission to keep an Assistance Animal in University housing will be required to resubmit to SDS the Service and Assistance Animal Registration Form each academic year, so that the University can track accommodation requests and Approved Animals in each of the University housing locations. If a student has been had a Assistance Animal approved in the past, SDS should provide historical deference to such accommodation and should only require new information or documentation in the event the students' circumstances have demonstrably changed.
- Documentation of the need for an Assistance Animal should show a relationship between their disability. Requests for verification on the part of SDS may be as follows:
  - The need to obtain verification of a disability or a requested accommodation depends on the obviousness of the person's disability, as well as the connection between the disability and the requested accommodation. When the disability is obvious and the requested accommodation is clearly related to the disability, no verification should necessary. Such requests should be promptly documented and approved.
  - If the disability is known, but the requested accommodation does not appear related to the disability, SDS may request only information necessary to evaluate the disability-related need for the accommodation.
  - If neither the disability nor the relationship between the disability and accommodation is clear, SDS may ask for proof of both.
  - SDS should be able to accept verification from a doctor or other medical professional who, in their professional capacity, has knowledge about the person's disability and/or need for accommodation. SDS may not accept documentation generated from fee-for-service entities



whose business purpose is to supply Assistance Animal certification via online questionnaires and/or Skype or phone interviews. The mental health professional providing the documentation must have a bona fide treatment relationship with the student. SDS has sole discretion to determine whether a treatment relationship meets this criterion.

- Submit signed copy of **Service and Assistance Animal Guidelines and Procedures** confirming their understanding of the responsibilities, guidelines and procedures for having an Approved Animal in University housing.
- Submit Required Documentation of good health as follows:
  - Clean Bill of Health: Owners must obtain documentation of the Approved Animal's clean bill of health from a licensed veterinarian. Acceptable documentation is a veterinarian's statement certifying that the animal is in good health and that all required vaccinations are up to date.
  - Vaccination: In accordance with local ordinances and regulations the animal must be immunized against diseases common to that type of animal. Dogs must have current vaccination against rabies and wear a rabies vaccination tag. Cats must have a current vaccination against rabies.
  - SDS must receive the annual documentation of good health at the time of the request to have a Service Animal in University housing.
- Students whose request for an Assistance Animal through this process is not granted will have the opportunity to go through a reconsideration process. All reconsiderations are reviewed by SDS and the Associate Vice Provost or a designee. Students will receive information about the reconsideration process upon notification of decision.
- Upon approval of an Assistance Animal, the appropriate residential building staff will be notified. The student's roommate(s) or suitemate(s) will be notified (if applicable) to notify them that the Approved Animal will be residing in shared assigned University housing living space.
- Students may not bring their Approved Animal(s) into their campus residence until the Owner's housing assignment and community considerations are confirmed by Residential Services.

## **Section VI. Owner's Responsibilities Regarding Approved Animals in University Housing**

The following guidelines apply to all Approved Animals and their Owners, unless the nature of the documented disability of the Owner precludes adherence to these guidelines, and permission for a variance from the guidelines has been granted by SDS or Residential Services.

- The Owner may not bring any animal into University Housing if the process outlined above has not been completed or if the Owner has not received permission to bring the animal into University Housing. Permission will not be granted until Disability Services has reviewed an Approved Animal's record of good health (as outlined in the section below).
- The Owner is responsible for assuring that the Approved Animal does not unduly interfere with the routine activities of the residence or cause an undue burden for students who reside there.
- The Owner is financially responsible for bodily injury or property damage caused by the Approved Animal. The Owner's responsibility includes but is not limited to replacement of furniture, carpet, windows, wall coverings, and other property. The Owner is responsible for paying these costs at the time of repair and/or move-out.
- The Owner is responsible for any expenses incurred for cleaning above and beyond a standard cleaning and for repairs to University premises that are assessed after the student and Approved Animal vacate the residence. The University shall have the right to bill the Owner's student account for unmet obligations resulting from such cleaning fees.
- University housing reserves the right to enter the Owner's residence without prior notice to complete necessary, emergency repairs to the residence. University housing is not responsible for containing an Approved Animal within the residence during scheduled or unscheduled repairs.
- The Owner must notify Disability Services in writing if the Approved Animal is no longer needed or being used as an Approved Animal or is no longer in University housing. The Owner must file a new request (following procedures outlined in [Section V](#) or [Section VI](#) in this document to replace an Approved Animal.
- The Owner is also responsible for ensuring the cleanup of the animal's waste and, when appropriate, must toilet the animal in areas designated by the University consistent with the reasonable capacity of the Owner. 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 that waste is not tracked onto carpeted surfaces. Litter boxes may not be stored in shared use bathrooms.
- The Owner's residence may be inspected for fleas, ticks or other pests once a semester or as needed. The applicable Housing office 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 undertaken in University housing.
- For students in the Residence Halls and/or Apartment shares, the Owner must keep the animal in his or her room or in an appropriate container while the Owner is not in the room with the animal.
- Service Animals may travel freely with their Owner throughout University housing (and other areas of the University, see [Section IIA](#) of this document). Assistance Animals must be contained within the

Owner's privately assigned residential area (room, suite, apartment) at all times, except when transported outside the private residential area in an animal carrier or controlled by leash or harness. When outside the residence, the Owner of an Assistance Animal shall carry proof that the animal is an Approved Animal.

- Students may, but are not required, to carry a copy of the approval letter from SDS and/or request an Approved Animal sticker annually for their Penn card. This is not required.
- Care and supervision of the Approved Animal are the responsibility of the Owner. The Owner is required to maintain control of the Approved Animal at all times. Approved Animals may not be left overnight in University housing to be cared for by another student. Animals must be taken with the Owner if they leave University housing overnight.
- The Owner agrees to continue to abide by all other residential policies.
- Any violation of the above rules may result in immediate removal of the animal from the University and may be reviewed through the appropriate University disciplinary process. The Owner will be afforded all due process and appeal rights as outlined in that process.
- Removal of the Approved Animal from the University's premises for any reason shall not release the Owner from his or her housing contract. Should the Approved Animal be removed from the premises for any reason, the Owner is expected to fulfill their housing obligations for the remainder of the housing agreement.
- The Owner agrees to comply with animal health and well-being requirements as set forth in [Section VIII](#).

## **Section VII. Approved Animal Health and Well-being**

- In addition to submitting required documentation of good health during the initial approval process and annually thereafter, the University may in its discretion require the Owner to submit updated documentation of good health as follows:
  - Clean Bill of Health: Owners must obtain documentation of the Approved Animal's clean bill of health from a licensed veterinarian. Acceptable documentation is a veterinarian's statement certifying that the animal is in good health and that all required vaccinations are up to date.
  - Vaccination: In accordance with local ordinances and regulations the animal must be immunized against diseases common to that type of animal. Dogs must have current vaccination against rabies and wear a rabies vaccination tag. Cats must have a current vaccination against rabies. (<https://www.animallaw.info/statute/pa-rabies-chapter-7a-rabies-prevention-and-control-domestic-animals-and-wildlife-act>)
- Licensing: Pennsylvania law requires that every dog be licensed. The University reserves the right to request documentation that the animal has been licensed.
- Training: Service Animals must be properly trained.
- Leash: Philadelphia law requires that dogs must be restrained by a leash of no more than six feet in length while in public areas. Owners must ensure that their Approved Animal is on a leash while in public areas unless the leash would inhibit the animal's ability to be of service.
- Animal Size: The University reserves the right to deny the request of the Owner to have an Approved Animal if the specific animal requested is too large to live safely and comfortably in the Owner's assigned residence. The University is not required to assign an Owner to a larger residence in order to accommodate an Assistance animal, but may do at its sole discretion, subject to availability.

## **Section VIII: Housing Assignments for Students with Approved Animals and Community Considerations**

- Students with medical condition(s) that are affected by animals (e.g., respiratory diseases, asthma, severe allergies) must contact Disability Services if they have a health or safety related concern about exposure to an Approved Animal. The University is prepared to reasonably accommodate individuals with such medical conditions should they require accommodation when living in proximity to Service Animals or Assistance Animals.
- Residential Services will make a reasonable effort to notify tenants in University housing where the Approved Animal will be located.
- SDS will resolve any conflict as a result of the presence of an Approved Animal in a timely manner. Staff members will consider the conflicting needs and/or accommodations of all persons involved. SDS staff may consult with Penn Student Health staff regarding health issues.
- For students in the Residence Halls and/or Apartment shares, all roommates or suitemates of the Owner must agree in writing to allow the Approved Animal to be in University housing with them. The roommates or suitemates must communicate this written consent to the appropriate Housing office. In the event that one or more roommates or suitemates do not agree, either the Owner and Approved Animal or the non-approving roommates or suitemates, as determined by the appropriate Housing office, may be moved to a different location.
- For students in the Residence Halls and/or Apartment shares, where the Owner's roommate or suitemate already has a previously Approved Animal living in the room or suite, the University reserves the right to deny the application of the Owner to have an Approved Animal or to move the Owner to a different location, if one is available. The University will consider each instance where multiple Approved Animals may be present in a room or suite on a case-by-case basis, accounting for both the needs of the students involved, and the health and safety of the Approved Animals. The University is not required to re-assign an Owner to a single-occupancy unit because the Owner is approved for an animal.

## **Section IX: Exceptions and Exclusions/ Removal of Approved Animals**

The University and/or PSOM may impose some restrictions on, and may even exclude or ban, an Approved Animal in certain instances. Restrictions or exclusions will be considered on a case-by-case basis. Access to University and/or Hospital of the University of Pennsylvania (HUP) property may be restricted or revoked under the circumstances outlined below. The University and/or PSOM may contact Animal Control or another animal welfare agency to remove the Approved Animal. The University and/or PSOM reserves the right to remove or exclude an Approved Animal from campus if:

- **Direct threat to health and safety:** The Approved Animal poses a direct threat to the health and safety of others, or if the threat to the safety of others cannot be reduced or eliminated by reasonable modifications. An example of this would be an Approved Animal that exhibits aggressive behaviors or has injured a person or another animal. In considering whether an Approved Animal poses a direct threat to the health or safety of others, an individualized assessment based on reasonable judgment, current medical knowledge, or the best available objective evidence will be conducted to determine 1) the nature, duration, and severity of the risk; 2) the probability that the potential injury will actually occur; and 3) whether reasonable modifications of policies, practices, or procedures will mitigate the risk. Pursuant to Section 459-505-A(e) of the Pennsylvania Code (“Pennsylvania Dog Bite Law”), the University will report all animal bites by an Approved Animal.
- **Owner does not maintain control of animal:** In the event that the Approved Animal creates an unmanageable disturbance or interference with the University community, the animal may be removed. An Owner may be directed to remove an animal that is out of control if the Owner does not take effective action to gain and maintain control. Owners are expected to maintain control of the Approved Animal at all times. The Owner may be prohibited from bringing the Approved Animal into any University facility until the Owner can demonstrate that they have taken significant steps to control the Approved Animal’s behavior. An example of this may be an Assistance Animal that repeatedly gets out of student’s housing or a Service Animal being let loose in the library, even if it does not physically injure a person or another animal.
- **Fundamental Alteration/Undue Burden:** If the Approved Animal’s presence results in a fundamental alteration of the University’s program or an undue burden to the University, the Approved Animal may be removed.
  - Students may be denied the accommodation of an Approved Animal in an academic setting if the animal’s presence fundamentally alters the nature of the educational program. An example of this may be a lab or clinical/non-clinical course that requires a sterile working environment and the Approved Animal’s presence would compromise the sanitation/operational standards for the lab. Another example may be a lab course involving the use of lab animals and the Approved Animal’s presence will be disruptive to the lab animals. Note: Assistance Animals are not permitted to accompany students on campus, aside from housing; and, are not permitted in other areas where clinical encounters may occur, including all classroom and common spaces in the Jordan Medical Education Center (JMEC), and all campus medical and research buildings.
  - Additionally, if the Approved Animal or its presence creates an unmanageable disturbance or interference with the University community, this may be considered an undue burden for the University.
- **Improper/Inadequate Care of Animal:** Owners must ensure that Approved Animals are properly housebroken and/or trained. They must also ensure that the Approved Animal and its environment are maintained in a healthy, clean manner. The Approved Animal may be removed if it:
  - Is not certified by a licensed veterinarian as being in good health.
  - Is not current with required vaccinations under local and state regulations.

- Exhibits signs of abuse or neglect.
    - Note: The University may report the animal abuse or neglect to the appropriate authorities, in addition to taking appropriate University disciplinary action.
  - Is not housebroken.
- **The Owner does not comply with Owner’s Responsibilities in University Housing** (refer to [Section VI](#) of this document)
  - **Damage and/or Harm Caused by Approved Animal**
    - The Owner is solely responsible for any harm to persons or property damage caused by the Approved Animal.
    - The University and University officials may take any and all reasonable and necessary actions to report or disclose damage and/or harm caused by an Approved Animal to the appropriate University office or government agency.
    - The Owner is solely responsible for any injuries or damage to University or other personal property caused by their Approved Animal.

#### **IV. POLICY AUTHOR(S)**

The University of Pennsylvania  
The UME Policy Subcommittee of UMEC

#### **V. GOVERNING BODY**

UMEC

#### **VI. POLICY HISTORY**

<b>Date</b>	<b>Change</b>
Summer 2023	Created
09/19/2023	Approved