

Title: Policy on Service and Emotional Support Animals

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1.0 PURPOSE

To establish the conditions under which service animals and emotional support animals may be brought onto the property, and to specify the procedures by which permission will be granted to do so.

2.0 BACKGROUND

See Appendix 1 for helpful background references.

The Americans with Disabilities Act (ADA) recognizes that service dogs must be allowed on premises of most businesses to assist their handlers who have a disability. Churches are exempt from the ADA, and may decide whether or not to allow service animals in their facilities.

The ADA defines a **service animal** as “a dog that has been individually trained to do work or perform tasks for an individual with a disability. The task(s) performed by the dog must be directly related to the person’s disability.” Typically, disabilities that may involve service animals include impaired vision, hearing, or mobility. Occasionally, persons with neuropsychiatric disabilities may employ a service animal for specific tasks (e.g., interrupting self-harm behaviors or early warning for impending seizures). Allergen-alert animals have also been included as service animals. The vast majority of service animals are dogs; however, miniature horses have been allowed on occasion.

Connecticut law only speaks to disabilities of sight, hearing, and mobility; however, applicable businesses in Connecticut must comply with federal ADA guidelines.

There is no way to be certain that an animal has been trained as a service animal. That is, there is no universal or standardized certification or training. Persons with disabilities may or may not have any type of documentation that their animal has been trained. Service animals may or may not have a vest or other identifying hardware. It is, in essence, an honor system.

In assessing a situation, ADA states that proprietors may ask two questions:

- Is the service animal required because of a disability?
- What work or task has the animal been trained to perform? Note that an individual may not be asked about his or her specific disability.

The ADA states that service animals must be well-behaved, and if they are not (e.g., barking, growling, drooling, elimination) they can be asked to leave the premises.

Emotional support animals are not the same as service animals. Emotional support animals are defined as animals that provide comfort or therapeutic benefit through companionship to individuals with psychiatric disabilities or other mental or emotional impairments; however, they are not trained to perform specific tasks. Various species have been used as emotional support animals. Emotional support animals are not covered by the ADA.

3.0 POLICY STATEMENT

USNH seeks to maintain a clean, healthy environment for our members and guests. USNH will allow dogs on the premises as service animals or emotional support animals, subject to approval according to the procedures outlined below. Dogs are the only species that will be allowed.

4.0 PROCEDURES

4.1 Individuals requesting that they be accompanied by a service dog will be asked the two allowable ADA questions:

- Is the service or emotional support dog required because of a disability?
- What work or task has the dog been trained to perform?

*Note that an individual may **not** be asked about his or her specific disability.*

4.2 Individuals requesting that they be accompanied by an emotional support dog will be asked for a clinician's note stating that the dog is required to stabilize or support a clinical condition.

- The note need not identify the specific symptoms or condition.
- The content of the note will not be critiqued or evaluated by USNH personnel.

4.3 Each individual seeking to have a service or emotional support animal will sign an Acknowledgement Form (Appendix 2)

4.4 The individual and their service or support dog will be seated in an area designated by USNH staff or designated volunteers. The individual and their dog may have access to other areas of the facility as is appropriate (e.g., social hall for coffee hour or events, library or other rooms and offices for events and meetings).

4.5 The dog and its handler are expected to adhere to the following requirements:

- Dogs will remain with their handlers at all times.
- Dogs will not be on furniture.
- Dogs must be leashed, harnessed, or tethered, unless (in the case of service dogs) these devices interfere with the animal's work or the individual's disability prevents using these devices. In that case, the handler must maintain control of the animal through voice, signal, or other effective controls.
- Dogs will not obstruct an area used for emergency evacuation.
- Handlers will limit their seating and walking areas in order to be sensitive to our members with animal allergies and to be attentive to the presence and needs of children and those with limited mobility.
- Handlers will keep their dogs heeled at all times when moving around.
- Dogs are expected to be comfortable around children.
- If the dog is not well-behaved, (e.g., barking, growling, drooling, elimination) the individual will be asked to remove it from the premises and future access may be revoked.

4.6 Because USNH is not required to permit either service or emotional support dogs, we retain the right to revoke permission to bring these animals onto the premises at any time and for any reason.

5.0 RESPONSIBILITIES

5.1 The Connections Coordinator or their designee will evaluate the individual's request and documentation as above. They will sign off on the Acknowledgement Form and ensure that it is filed with the USNH Office.

5.2 The Connections Team, Worship Associates, Management Team members, or other USNH staff will be tasked with addressing animal behavior problems as in Section 4.5 above.

REVISION HISTORY

Rev	By	Date	Changes Made
1	Management Team	7/28/2024	Proposed initial draft.
2	Management Team	8/8/2024	Reviewed by Board, DLRE, Administrator, Connections Coordinator.
3	Management Team	9/4/2024	Reviewed by the Connections Team and the Worship Committee
4	Management Team	9/10/2024	Approved for release.
A			
B			

APPENDIX 1: Helpful Background Resources

<https://www.ada.gov/resources/service-animals-faqs/#definition-of-a-service-animal>

<https://www.providentlawyers.com/what-are-the-rules-for-service-or-emotional-support-animals-at-church-services-or-events/>

<https://www.nolo.com/legal-encyclopedia/connecticut-laws-on-service-dogs-and-emotional-support-animals.html>

<http://www.equualaccess.org/wp-content/uploads/2017/03/WHEN-A-SERVICE-DOG-COMES-TO-CHURCH-USA.pdf>

Appendix 2: Acknowledgement Form

Standard Operating Procedure (SOP) 18 sets forth USNH's policy and procedures around service and emotional support animals. This form is to be completed for every person seeking permission to bring an emotional support or service dog to USNH and updated with any subsequent issues or decisions.

An orientation meeting was held on _____ (date).

The expectations for the dog and its handler were reviewed, including the following:

- Dogs will remain with their handlers at all times.
- Dogs will not be on furniture.
- Dogs must be leashed, harnessed, or tethered, unless (in the case of service dogs) these devices interfere with the animal's work or the individual's disability prevents using these devices. In that case, the handler must maintain control of the animal through voice, signal, or other effective controls.
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- Handlers will limit their seating and walking areas in order to be sensitive to our members with animal allergies and to be attentive to the presence and needs of children and those with limited mobility.
- Handlers will keep their dogs heeled at all times when moving around.
- Dogs are expected to be comfortable around children.
- If the dog is not well-behaved, (e.g., barking, growling, drooling, elimination) the individual will be asked to remove it from the premises and future access may be revoked.

Present at the meeting were:

Congregant:

Staff or lay leader(s):

I acknowledge that I have received and discussed SOP 18 with the USNH staff and/or lay leaders noted above, that I have had the opportunity to ask questions, and that I understand the policy and procedures.

Congregant's signature

Date

Permission to bring a ____ service dog or ____ emotional support dog was:

granted

denied (specify reasons below)