



Northwestern University

Responsible University Officials: Executive Vice President; Provost; Vice President for Student Affairs; Vice President and Chief Human Resource Officer

Responsible Office: Office of Equal Opportunity and Access; Accessible NU

Origination Date: January 27, 2017

Service, Assistance, and Other Animals at Northwestern

Policy Statement

This policy addresses Northwestern's requirements and guidelines regarding the use of service, assistance, and other animals.

Reason for Policy/Purpose

Northwestern is committed to fostering an inclusive environment for all members of its community, including individuals with disabilities who require service or assistance animals. In order to better support individuals with disabilities and promote adherence to laws requiring accommodations for individuals with disabilities, including the Americans with Disabilities Act (“ADA”), this policy provides guidance concerning the appropriate use of and protocols associated with service, assistance, and other animals on campus.

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Who Approved This Policy

Executive Vice President; Provost; Vice President for Student Affairs; Vice President and Chief Human Resource Officer

Who Needs to Know This Policy

All members of the University community, including faculty, students, staff, and visitors.

Website Address for This Policy

<http://policies.northwestern.edu/docs/animal-policy-final-012717.pdf>

Contacts

If you have any questions about service or assistance animals at Northwestern, you may contact the following offices:

Students requesting academic accommodations: Questions related to service or assistance animals as part of a student's in-class accommodations or determination of reasonable accommodations and services for students with disabilities:

AccessibleNU
Phone: 847-467-5530
accessiblenu@northwestern.edu

Students requesting housing-only accommodations: Questions related to bringing a service or assistance animal to University housing:

Residential Services
Phone: 847-467-HOME (4663)
housing@northwestern.edu

Faculty/Staff: Questions related to service or assistance animals as part of an employee's accommodations or determination of reasonable accommodations and services for employees with disabilities:

Office of Equal Opportunity and Access
Phone: 847-491-7458
eeo@northwestern.edu

All members of the University community:

Questions relating to this policy:

Office of Equal Opportunity and Access
Phone: 847-491-7458
eeo@northwestern.edu

Reporting any animal in *University housing* that is disruptive, out of control, or poses a threat to safety:

Residential Services
847-467-HOME (4663)

Reporting any animal *elsewhere on campus* that is disruptive, out of control, or poses a threat to safety:

Northwestern University Police
Evanston Campus:
Phone: 847-491-3456
Chicago Campus:
Phone: 312-503-3456

Reporting a concern about disability discrimination or harassment:

Office of Equal Opportunity and Access
Phone: 847-491-7458
eeo@northwestern.edu

Definitions

Assistance Animals: Animals that provide emotional support or comfort that alleviates one or more identified symptoms or effects of a person's disability. Because Assistance Animals have not been trained to perform a specific job or task, they do not qualify as service animals under the ADA. 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 are sometimes referred to as "comfort animals" or "emotional support animals." While dogs are the most common assistance animals, other animals may also serve as assistance animals.

Disability:	A documented physical or mental impairment that substantially limits one or more major life activities, or a record of such an impairment.
Owners:	Faculty, staff, students, or visitors who (1) use a Service Animal to perform work or tasks; (2) use an approved Assistance Animal for emotional support or comfort; or (3) otherwise bring an animal on campus. (<i>See Section VIII and Appendix A for Owner's Responsibilities.</i>)
Pets:	An animal that is kept for ordinary use and companionship. A pet is not considered a service or assistance animal.
Public Areas:	All areas of Northwestern where students, members of the public, recipients of services, or participants in the University's programs or activities are generally allowed to go.
Reasonable Accommodation:	A modification or adjustment to a class, program, or job that would allow a qualified individual with a disability to participate in the class or program, or to perform the essential functions of the job, without creating an undue burden on the University or fundamentally altering academic, conduct, or performance requirements. Student requests for reasonable accommodations are determined by AccessibleNU or, in the case of housing accommodations, the Room & Board Accommodation Committee. Faculty or staff requests for reasonable accommodations are determined by the Office of Equal Opportunity and Access.
Service Animals:	For purposes of this policy, service animals will be referred to as "service dogs" or "service animals."
	Service animals are dogs that are 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 disability. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to

take prescribed medications, calming a person with Post Traumatic Stress Disorder during an anxiety attack, or performing other duties. Service dogs are working dogs, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Service dogs are not assistance animals. Dogs whose sole function is to provide comfort or emotional support do not qualify as service dogs.

In some cases under the ADA, a miniature horse that has been individually trained to do work or perform tasks for people with disabilities may be permitted as a service animal. (*See* Section II of this policy). Other animals, whether wild or domestic, do not qualify as service animals.

Policy/Procedures

I. Service Animals in Public Areas of the University

- A.** Except as set forth in Section I(D) below, service dogs must be permitted to accompany people with disabilities in all public areas of the University. For an individual to qualify to have a service dog on campus (1) the individual must have a disability as defined by the ADA and (2) the service dog must be trained to do specific tasks for the individual that are related to the individual's disability.
- B.** University employees cannot ask about the nature or extent of a person's disability to determine whether a person's dog qualifies as a service dog. When it is not obvious what service the dog provides, University employees may make only two inquiries to determine whether the dog qualifies as a service dog, which are:
 - 1)** Is the dog required because of a disability?
 - 2)** What work or task has the dog been trained to perform?

University employees cannot 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. Service animals are not required to wear a vest, ID tag, or specific harness.

- C.** A service dog must be housebroken and must be kept under control by a harness, leash, or other tether, unless these devices interfere with the service dog's work or the individual's disability prevents using these devices. In cases where a harness, leash, or other tether cannot be used, the owner must maintain control of the service dog at all times.

D. Although service dogs are generally allowed in public areas of the University, it may be appropriate, in limited instances, to exclude a service dog from certain areas of the University where the dog's presence may cause a fundamental alteration to the nature of the service or program provided in the area. The University will decide, on a case-by-case basis, which areas of the University fall into this limited exception. Some examples of areas where service dogs may be excluded include, but are not limited to:

- 1)** Sterile rooms (e.g., certain research laboratories);
- 2)** Areas where food is prepared (although service dogs cannot generally be excluded from dining areas where food is present nor can they be excluded from communal food preparation areas, such as are commonly found in residence halls);
- 3)** Areas where the use of a service dog may compromise the integrity of certain research;
- 4)** Areas with research/demonstration animals.

The determination of whether service dogs may be excluded from a public area of campus must be made in collaboration with AccessibleNU and the Office of Equal Opportunity and Access. Upon receiving such a request, the appropriate University representatives will analyze the circumstances surrounding the request and evidence pertaining to the request, and make an individualized determination regarding whether service dogs should be excluded in the area.

E. Individuals with disabilities who require a service dog will not be denied access when another individual on the premises is allergic to dogs. In such instances, both parties should consult with the Office of Equal Opportunity and Access or AccessibleNU to determine if both parties can be accommodated. (*See Section VII of this policy.*)

F. A person with a disability may be asked to remove a service dog from the premises if (1) the dog is out of control or aggressive and the owner does not take effective action to control it; (2) the dog is not housebroken; (3) the dog is physically ill; (4) the dog attempts to enter a place on campus where the presence of an animal causes danger to the safety of the owner and/or members of the University community; (5) the dog attempts to enter any place on campus where the dog's safety is compromised; (6) the dog attempts to enter any place on campus where service and assistance animals are prohibited. (*See Section I(D) of this policy.*) If a member of the University community requests that a person with a disability remove their service dog, the requestor must notify the Office of Equal Opportunity and Access or AccessibleNU immediately.

G. Students who require the use of a service dog on campus are strongly encouraged to contact AccessibleNU to register as a student with a disability and to determine what assistance is available. Information provided to AccessibleNU will not be released without the signed consent of the student or as allowed by law.

H. Employees who require the use of a service dog on campus are strongly encouraged to contact the Office of Equal Opportunity and Access. The Office of Equal Opportunity and Access will assist the employee in navigating the workplace,

communicating with colleagues about the presence of the service animal (if desired), and assisting with any related accommodation needs.

- I. In limited circumstances miniature horses may qualify as service animals under the law. The University will consider requests for the use of miniature horses by people with disabilities on a case-by-case basis. Requests by employees should be directed to the Office of Equal Opportunity and Access and requests by students should be directed to AccessibleNU. In each case, University officials will consider (1) whether the miniature horse is housebroken; (2) whether the miniature horse is under the owner's control; (3) whether the facility can accommodate the miniature horse's type, size, and weight; and (4) whether the miniature horse's presence will compromise legitimate safety requirements necessary for safe operation of the facility.
- J. Individuals qualified to train dogs or miniature horses to aid and guide persons with disabilities are afforded the same rights as those individuals who require the assistance of a service animal. Any individual who is training a dog or miniature horse to aid and guide persons with disabilities is strongly encouraged to contact AccessibleNU or the Office of Equal Opportunity and Access and comply with the requirements set forth in this policy.

II. Assistance Animals in Public Areas of the University

- A. Assistance animals are generally not permitted inside public areas of the University. The use of an assistance animal outside of a student's room may be allowed as a reasonable accommodation for students, through established AccessibleNU procedures, or for employees, through established Office of Equal Opportunity and Access procedures.
- B. If permitted as an accommodation, assistance animals and their owners are subject to the same requirements and restrictions described in this policy that are applicable to service and other animals, in particular, Sections I(D), VIII, X, and Appendix A. Guidelines regarding service and assistance animals in residence halls are provided below.

III. Service Dogs in Residence Halls

- A. Students planning to bring their service dog to reside in a residence hall are encouraged to follow the steps below:
 - 1) The student seeking to keep a service dog in a residence hall is strongly encouraged to notify Residential Services by emailing housing@northwestern.edu. Requests for housing accommodations should follow the deadlines and other procedures specified on the Residential Services [website](#).
 - 2) Notification of service dogs in housing does not require documentation of disability. Rather students are asked to confirm, in writing, that the service

dog is required because of a disability and provide information regarding the work or task that the dog has been trained to perform.

- 3) Upon receipt of the student's notification, the Room & Board Accommodation Committee will review the request, and Residential Services and the student will meet to discuss suitable rooms/residence halls. During the meeting, the student will also be asked to review and acknowledge receipt of this policy, including Appendix A.
- B. Upon notification of a service dog in a residence hall, Residential Services will inform the residential building's staff about the presence of the service dog and direct staff to review this policy.
- C. Upon notification of a service dog in a residence hall, the student's roommate(s) and/or suitemate(s) will be notified that an approved dog will be living in the shared assigned living space. All roommates and suitemates of the owner will be asked to sign the Roommate/Suitemate Acknowledgement in the Student Housing Service & Assistance Animal Agreement. In the event that one or more roommates or suitemates object, either the owner and dog or the objecting roommates or suitemates, as determined by the appropriate Residential Services office staff with the agreement of the service dog owner, may be moved to a different location.
- D. Service dogs in residence halls may travel freely with their owner throughout University residence halls and public areas of the University. (*See Section I of this policy regarding service dogs in public areas of the University.*)
- E. Miniature horses: The University will consider requests for miniature horses by individuals with disabilities to live in residence halls on a case-by-case basis.

IV. Assistance Animals in Residence Halls

- A. Students are permitted to keep assistance animals in residence halls on a case-by-case basis as a reasonable accommodation for a documented disability. Assistance animals may not be brought into residence halls without express approval of AccessibleNU.
- B. A student seeking to keep an assistance animal in a residence hall must follow the guidelines set forth in the University's [Housing and Meal Plan Accommodation Request Form](#). Requests for housing accommodations should follow the deadlines and other procedures specified on the Residential Services [website](#).
- C. Documentation of the need for an assistance animal should follow AccessibleNU [guidelines](#) for documentation of disability.
- D. Upon receipt of the student's request, the Room & Board Accommodation Committee will review the request, and, if approved, Residential Services will meet with the student to discuss suitable rooms/residence halls. During the meeting, the student will also be asked to review and acknowledge receipt of this policy, including Appendix A.

- F. Upon approval of a student's request for an assistance animal in a residence hall, Residential Services will inform the residential building's staff about the presence of the assistance animal and direct staff to review this policy.
- G. Upon approval of a student's request for an assistance animal in a residence hall, the student's roommate(s) or suitemate(s) will be notified that an approved animal will be living in the shared assigned living space. All roommates and suitemates of the owner must sign the Roommate/Suitemate Acknowledgement in the Student Housing Service & Assistance Animal Agreement. In the event that one or more roommates or suitemates object, either the owner and animal or the objecting roommates or suitemates, as determined by the appropriate Residential Services staff with the agreement of the assistance animal owner, may be moved to a different location.
- H. Approval of a student's request for an assistance animal in a residence hall does not constitute approval for the student to bring the assistance animal to other areas of campus or into public areas of the residence hall. All buildings and other indoor areas of campus, except for the privately assigned living space in housing and necessary ingress/egress public spaces for that living space, are off limits to approved assistance animals without prior authorization from the Room & Board Accommodation Committee.

V. Service and Assistance Animals for Faculty and Staff

- A. Faculty and staff are strongly encouraged to notify the Office of Equal Opportunity and Access before bringing a service animal to work.
- B. Faculty or staff members with disabilities may request the use of an assistance animal as part of the University's reasonable accommodation process. For more information regarding how to request an accommodation, please review the University's [Employees with Disabilities Accommodation Process](#). Requests for reasonable accommodations must be directed to the Office of Equal Opportunity and Access (847-491-7458).

VI. Other Animals

- A. Because of their potential to disrupt research, and because others on campus may be allergic to or disrupted by them, pets are generally not permitted in any campus buildings, including offices, classrooms, public areas, and housing.
- B. When brought to outdoor areas on campus or otherwise, pets and their owners are subject to the same requirements and restrictions described in this policy that are applicable to service and assistance animals, in particular, Sections I(D), VIII, X, and Appendix A.

VII. Conflicting Health Conditions

- A.** Students with medical condition(s) that are affected by animals (e.g., respiratory conditions, asthma, severe allergies, etc.) are asked to contact AccessibleNU if they have a health or safety-related concern about exposure to a service or assistance animal.
- B.** Employees with medical condition(s) that are affected by animals are asked to contact the Office of Equal Opportunity and Access if they have a health or safety-related concern about exposure to a service or assistance animal.
- C.** In such instances, the University will reasonably accommodate individuals with medical conditions that require accommodation when living and/or working in proximity to service or assistance animals.
- D.** For more information on the reasonable accommodation process for students, please visit <http://www.northwestern.edu/accessiblenu/>. For more information regarding the reasonable accommodation process for employees, please visit <http://www.northwestern.edu/hr/equopp-access/index.html>.

VIII. Owner's Responsibilities

Northwestern is not responsible for the care, training, or supervision of service, assistance, or other animals. Owners are responsible for the cost, care, and supervision of service, assistance, or other animals, including compliance with any laws pertaining to:

- animal licensing, vaccination, and owner identification;
- keeping the animal under control and taking effective action if the animal is out of control; and
- properly caring for the animal, and disposing of its waste.

Specific responsibilities pertaining to owners of service, assistance, and other animals are detailed in Appendix A.

IX. Requirements for All Members of the University Community

All members of the University community are expected to adhere to the following guidelines with regard to service and assistance animals:

- A.** Service animals must be allowed to accompany their owners at all times and in all public places on campus, except where service animals are specifically prohibited.
- B.** Individuals should not touch or pet a service or assistance animal without permission by the owner.
- C.** Individuals should not give treats or otherwise feed a service or assistance animal without permission by the owner.

- D.** Individuals must not attempt to separate the owner from the service or assistance animal.
- E.** Harassing or deliberately startling a service or assistance animal is strictly prohibited.
- F.** Individuals should avoid initiating conversations about the student or employee's disability. The nature of a person's disability is a private matter.

X. Removal of a Service, Assistance, or Other Animal

The University may exclude or remove a service, assistance, or other animal when:

- A.** The animal poses a direct threat to the health or safety of others;
- B.** The animal is not housebroken;
- C.** The animal is physically ill;
- D.** The animal attempts to enter a place on campus where the presence of a service, assistance, or other animal is prohibited;
- E.** The animal attempts to enter any place on campus where the animal's safety is compromised;
- F.** The owner does not comply with the owner's responsibilities detailed in Section VIII and Appendix A of this policy.

Forms/Instructions

Appendices

Appendix A – Responsibilities of Service, Assistance, and Other Animal Owners

Northwestern is not responsible for the care or supervision of service or assistance animals. Owners of service, assistance and other animals ("Owners") are responsible for the cost, care, and supervision of service, assistance, or other animals, including compliance with any laws pertaining to:

- animal licensing, vaccination, and owner identification;
- keeping the animal under control and taking effective action if the animal is out of control; and
- properly caring for the animal, and disposing of its waste.

Specific responsibilities pertaining to service or assistance animals, both in residence halls and elsewhere, are detailed below.

I. Responsibilities of Owners in Residence Halls

- A. Owner is responsible for assuring that the animal does not unduly interfere with the routine activities of the residence or cause difficulties for students who reside there. Owner must maintain control of the animal at all times.
- B. Owner is responsible for ensuring the cleanup of the animal's waste. If an assistance animal requires a litter box, the litter box must be cleaned regularly and placed on a mat to avoid tracking litter onto carpeted surfaces.
- C. Owner is solely financially responsible for the actions of the animal, including bodily injury or property damage. Owner's responsibility covers but is not limited to replacement of furniture, carpet, window, wall covering, and the like. Owner is expected to cover these costs at the time of repair and/or move-out of University Housing.
- D. Owner is responsible for any expenses incurred for cleaning above and beyond a standard cleaning or for repairs to University premises that are assessed after the student and animal vacate the residence. The University shall have the right to bill the student account of Owner for unmet obligations.
- E. Owner must notify Residential Services if the animal is no longer needed or is no longer in residence. To replace an assistance animal, Owner must file a new request for reasonable accommodation with Residential Services.
- F. Owner's residence may be inspected for fleas, ticks, or other pests once a quarter or as needed. 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. Owner will be billed for the expense of any pest treatment above and beyond standard pest management in the residence halls.
- G. Owners may not leave animals overnight in residence halls to be cared for by another student. Animals must be taken with the student or removed from campus by a designee of the student if the student leaves campus overnight.
- H. Owner agrees to continue to abide by all other residential policies, including the Student Housing, Service & Assistance Animal Agreement. Prior to the date that the animal is moved into the residence, Owner will be asked to review and acknowledge receipt of the Service, Assistance, and Other Animals at Northwestern Policy, including this Appendix.

II. Responsibilities of All Owners on University Property

- A. Control: Owner must be in full control of the animal at all times.
- B. Waste: Owner is responsible for ensuring the cleanup of the animal's waste.

- C. 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 should have the normal shots required for a healthy animal.
- D. Health: Animals must have an annual clean bill of health from a licensed veterinarian. Documentation can be a vaccination certificate for the animal or a veterinarian's statement regarding the animal's health. The University has authority to direct that the animal receive veterinary attention.
- E. Licensing: For assistance animals, the University reserves the right to request documentation showing that the animal has been licensed by the City in which it resides.
- F. Leash: If appropriate, the animal must be on a leash unless the leash would inhibit the animal's ability to be of service.
- G. Other Conditions: For assistance animals, the University may place other reasonable conditions or restrictions on the animals depending on the nature and characteristics of the animal.

Related Information

[City of Evanston Code of Ordinances, Title 9, Chapter 4](#)

[Municipal Code of Chicago, Title 7, Chapter 7-12](#)

History/Revision Dates

Origination Date: January 27, 2017

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