

Idaho State University



INTERDISCIPLINARY ETHICAL DECISION-MAKING FOR EMOTIONAL SUPPORT ANIMAL RECOMMENDATIONS

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"A MUTUALLY-BENEFICIAL AND DYNAMIC RELATIONSHIP BETWEEN PEOPLE AND ANIMALS" (AVMA, 2017)

THE HUMAN-ANIMAL BOND (HAB)

PLETHORA OF CONFUSION

Many are curious about the role of the Human-Animal Bond in human wellness.

- Much confusion and misunderstanding occurs about the role of animals in human wellness.
- Terminology and taxonomy relevant to HAB and HAIs are still in development and will likely continue to evolve.
- Sensationalized and inaccurate media coverage and inaccurate professional writing contributes to many false assumptions and misunderstanding.

Many different applications of the HAB exist, each promoting unique wellness goals, and requiring different preparation.

HAIs are NOT:

A Panacea

One-Size-Fits-All

Universally Beneficial

Just about the Benefitting the Human

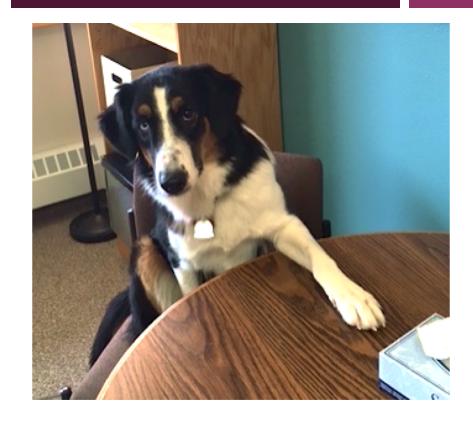


EMOTIONAL SUPPORT ANIMAL REQUESTS

- As the therapeutic application of the human-animal bond becomes increasingly popular and sensationalized, more and more mental health providers are being asked to provide letters for emotional support animals.
- Misuse and misunderstanding about ESA legislation creates problems for all professionals who work with animals, as it contributes to both public and professional skepticism.
- This is a complex decision that requires formal processes ethical decision-making.
- As professionals, we are in a unique position to educate ourselves and others about appropriate responses to requests for emotional support animals.

IN THIS WORKSHOP YOU WILL LEARN:

- Appropriate Taxonomy and Role Differentiation Among Helper Animals
- Access Considerations and Governing Policies & Regulations
- Potential Risks and Welfare Considerations
- Ethical Decision-Making
- Recommended Documentation
- HAB Beyond ESAs: Supporting Healthy Human-Animal Relationships in Treatment



TAXONOMY, POLICIES & ACCESS

Chapter I

treatment plan.

tasks (FHA, 1986).

<u>Compani</u>	on Animal	Working Animal		
A personal pet of any species which functions as companion to a human caregiver		Animals are specially trained to perform work functions		
Emotional Support Animal (ESA)	Therapy Animal	Service/Assistance Animal	Other Working Animals	
An animal of various species (excluding venomous animals or wildlife), supported by a physician or mental health professional based upon a disability-specific need. Does <i>not</i> perform specific tasks (FHA 1986)	A specially trained and evaluated animal, meeting specific criteria, which is included as an integral part of a goal-directed treatment process which must be directly relevant to a person's overall treatment plan	Any dog that is individually trained to do perform specific tasks for the benefit of an individual with a disability. Including physical, sensory, psychiatric, intellectual, or other mental disability (ADA 1990)	Animal of various species that is specially selected, trained, and prepared for a working role. Examples include, but are not limited to: herding dogs, flock guards, pack/draft animals, military working dogs, police dogs, FEMA	

mental disability (ADA, 1990).

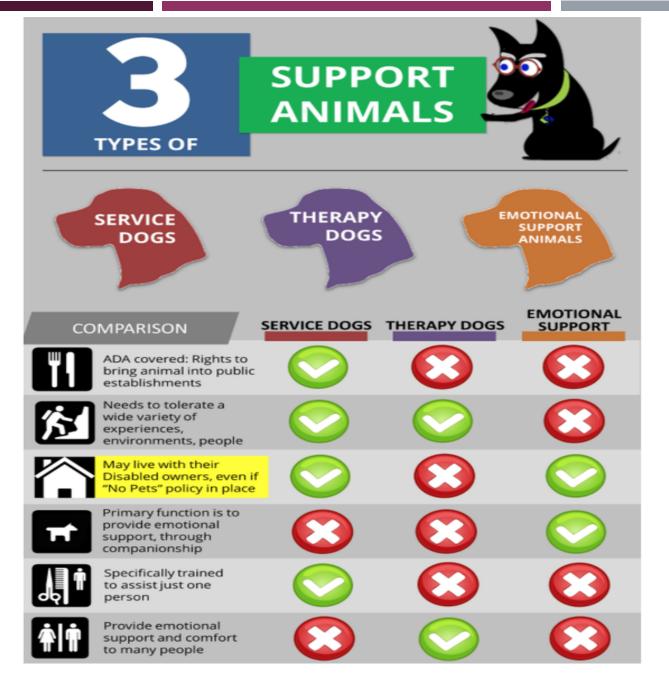
dogs.

	Species	Role	Training	Access Rights
Service/ Assistance Animal	Dogs only (rare exceptions for mini horses)	Performance of specific tasks directly related to a person's diagnosed disability	Advanced and intensive disability-specific, individual training and rigorous suitability and temperament evaluations. Typical 2+ years and \$25K Training.	General public access
Therapy Animal	Dogs, cats, horses, llamas/alpaca, guinea pigs, rats, rabbits, pot-bellied pigs, and some species of parrots	Engage the public and healthcare or human service clients in therapeutic human-animal interactions and interventions in partnership with a specially trained healthcare or human service provider	Must be trained to reliably perform basic obedience tasks and possess consistent and predictable manners and behavior in public and is formally evaluated through a recognized therapy animal organization	Only where invited
Emotional Support Animal (ESA)	Any non-venomous, domesticated species (no wildlife species)	A personal pet, prescribed by a healthcare provider, which provides comfort to a person with a verifiable mental illness	No formal training or evaluation of animal or human handler. ESA's do not perform specific tasks or behaviors	Housing situations only; <i>no additional public access rights</i>

HOW ARE ESAS, SERVICE, AND THERAPY ANIMALS DIFFERENT FROM EACH OTHER?



Helper Animal FAQ Cont'd



Roles and Tasks of Dogs in Society



Therapy Dogs*
Facility Dogs*

Roles:

- Visit Nursing Home
- Be Reading Partner
- Motivate Rehab
- Relieve Loneliness
- +Assist Professionals (medical, education, courthouse)

All Dogs:

Roles:

- Improve Mood/Comfort
- Relieve Depression
- Cause Calming Effect
- Relieve Stigma
- Motivate





Service Dogs***

Tasks:

- · Pull Wheelchair
- Alert on Seizures
- Alert on Glucose
- Guide Blind
- Retrieve Keys
- Alert to Sounds
- Ameliorate Stress

U.S. Legal/Regulatory Status

- * No handler disability: No Special Access
- ** Handler disability: Housing, public transport access
- *** Handler disability & dog tasks: Full public access

GOVERNING REGULATIONS

Service Animals

Americans with Disabilities Act (ADA)

Department of Justice (DOJ)

Emotional Support Animals

Fair Housing Act (FHA) ONLY

* Update: As of December 2020, ESAs are no longer covered by the Air Carrier Access Act (ACAA)*

State and Local Laws and Policies

- All Service, Emotional Support, and Therapy animals must meet current state, local, and federal laws and policies regarding vaccinations, and
 county licensing/registration, as would any other companion animal.
- Expenses and other considerations associated with such compliance are the responsibility of the animal's owner/handler, and financial or other access barriers do not exempt the owner from this legal responsibility.
 - Service animals are never allowed in shopping carts, shopping baskets, or to be seated at a table due to public health considerations

Legal to Ask	Illegal to Ask	
Is this a service animal required for a disability?	What is your disability diagnosis?	
What Specific tasks does this animal perform to support you?	Will the dog demonstrate the tasks it is trained to do to support your disability?	
Does this animal have proof of current vaccinations per local laws?	Do you have documentation to prove this animal is a service animal?	

ACCESS CONSIDERATIONS

Many individuals, businesses, and other entities are unaware of important access rights and access limitations. Contrary to some misconceptions, certain questions are legal, and access may be legally denied in some contexts.

- Service dogs which perform specific tasks of assistance to a person's disability are the <u>only</u> type of helper animal with public access.
 - Emotional Support and Therapy Animals DO NOT have public access in public places that are not normally designated as pet-friendly.
 - If an animal provides emotional comfort and anxiety management due to its presence (or a behavior that is considered normal for most pets) with the owner, this does not constitute a specific task per ADA policy, and would **not** be considered a service animal.
 - ✓ It is permissible to deny public access to an animal that does not perform a specific task per ADA (2011) policy.
- Any business, organization, institution, or housing provider may legally ask that any service, emotional support, or therapy animal to leave the premises IF the animal does any of the following:
- √ Urinates/defecates inappropriately
- ✓ Creates a disruption or causes property damage
- ✓ Violates noise ordinances
- ✓ Has a noticeable and offensive odor or is otherwise unhygienic
- ✓ III-behaved, or behaves aggressively

DOCUMENTATION & THE CHALLENGE OF FRAUD

What DOES Constitute Documentation?

- **ESA:** Letter (on professional letterhead), less than I year old, from a licensed provider stating that the animal is part of the individual's treatment plan to address a specific disability. Again, please note that this is for housing access ONLY! *Your letter is the only legitimate form of documentation for ESAs*
- **Service Animal:** Description of specific tasks of assistance to a person's disability.
- Therapy Animal: Documentation from a legitimate therapy animal evaluation and registration organization (Pet Partners, InterMountain TAs, TDI) that provides volunteer liability insurance policies to animal-handler teams during current registration in good standing.

What DOES NOT Constitute Documentation?

- The ADA and DOJ do not currently recognize <u>any</u> form of certificate, identification card, vest, or tag as proof of an animal's designation as a service animal OR and emotional support animal. See *fraudulent* examples to the right of this slide.
- Online "registration" and "certification" documentation is fraudulent and does not constitute appropriate documentation of any type of helper animal.
- Vests, identification tags, and identification cards <u>are not</u> required of service animals, although some handlers choose to use a vest to discourage others from approaching or distracting the service dog.

Symptoms of ESA Fraud

- Contributes to a public skepticism, which hurts those with valid helper animals
- When more fraudulent animals have greater public access, more public risk is incurred
- Monetary risk
- Risks and damages to public and legitimate service animals

U.S. Registered Support Animal



Emotional Support Animal





ESSENTIAL CONSIDERATIONS FOR CLINICIANS

BENEFICENCE AND NONMALEFICENCE + ESA CONSIDERATIONS = UNIQUE AND COMPLEX

Chapter 2

MAJOR CONTRIBUTORS TO RISKS

Lack of formal, appropriate training for humans and animals involved

- No required animal training/socialization preparations or evaluation of animal suitability
- No required handler competency training for human handler
- Inclusion of exotic species without sufficient empirical data to evaluate and predict behavior and temperament

These are very stressed animals

Provider Role Conflicts

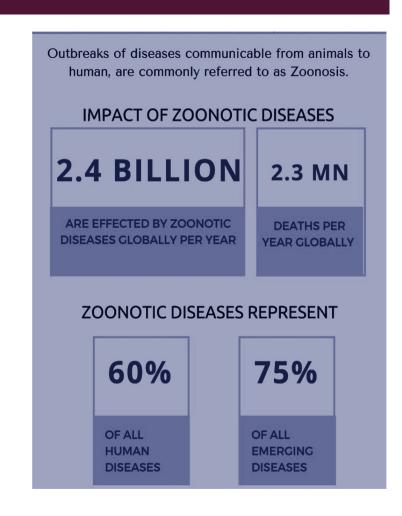
- Evaluating client need for an ESA is technically a forensic role, which can present problems if the evaluator is also the client's provider
- Scope of practice/Scope of competence concerns
- Potential for provider liability
- Lack of empirical support for the efficacy of ESAs to effectively treat mental health diagnoses in clients (to justify risks involved)

Client/Public Welfare

- No formal requirement for management and prevention of zoonosis
- Public interaction with untrained, socialized, and/or unevaluated animals potentially under stress increases risk of harm
 - Risk of harm is further amplified if the aforementioned animal is stressed, injured, or ill
- Intentionally or unintentionally misrepresenting an ESA as a Service Animal is illegal in some states
- Potential liability concerns for client in the case of harmful human-animal interactions

WHAT ABOUT THE CLIENT?

- Inadequate treatment of a mental health disorder
 - No compelling evidence that ESAs are effective to treat depression, anxiety, or PTSD
 - Pet Ownership and animal attachment is only helpful in certain contexts
 - Can increase isolation if the pet is a replacement for human relationships
 - Can exacerbate symptoms if individual becomes dependent on pet for symptom alleviation (rather then developing internal coping strategies)
 - If responsibility for or reasonable separation from pet creates additional stressors
- Health concerns
 - Injury or property damage from an inadequately trained or socialized animal
 - Zoonotic infection or disease (e.coli and salmonella are most common)
 - Animal allergies
- Legal concerns
 - If ESA is misrepresented as a service animal
 - Individual is liable for any incidences or damages incurred by ESA



WHAT ABOUT OTHERS?

- Injury or emotional damage from inadequately trained animal
 - Untrained animals may be more likely to be stressed or aggressive in public
 - Unsocialized animals may be disruptive and interfere with normal activities
- Public Health
 - Zoonoses from ESA
 - Public health considerations from animal waste and/or lack of proper hygiene
 - Allergens and phobias
- Harm to those with ADA-Compliant Service Animals
 - Harmful interactions with other animals, especially service animals
 - Increased difficulty for those with legitimate service animals due to fraud



This is a very stressed animal

nese are very stressed animals*

WHAT ABOUT THE ANIMALS?

- When involving animals in treatment decisions, 'do no harm' is extended to include the animal
- Neglect or other abuse; poor mental health may prevent adequate animal care
- Undue stress from consistent work during accompaniment, including stressful environments
- Undue stress from being handled by a person without appropriate training
- Illness, undue stress, or injury from public interactions

Did you know:

 Interactions with unfamiliar people, places, and/or situations is the top stressor for domestic dogs

Many of these risks can be mitigated by providing psychoeducation about lack of public access appropriateness for ESA as well as orienting the client to pet ownership responsibilities.







NEXT STEPS

CLINICAL DECISION MAKING AND DOCUMENTATION

Chapter 3

SO I RECEIVED AN ESA REQUEST. NOW WHAT??







Don't Panic!!

How might you respond considering the following concerns:

Liability

Animal Welfare

Public Safety

Rationale for ESA inclusion

Additional language in the letter

DISCUSSION

- When might an ESA be helpful to a person?
- When might an ESA be harmful to a person?
- In what ways does the client think their lives will be different if you provide an ESA letter?
- Is the client aware of current policies and limitations?



CONSENSUS HIGHLIGHTS

- Strongly suggests that counselors abstain from writing letters for persons seeking counseling or assessment for the sole purpose of obtaining an ESA recommendation letter
 - Only for clients currently under provider's care
 - Must be directly linked to treatment goals and addressed as part of the treatment process
- Counselor must have a thorough knowledge of the local, state, and federal laws and policies surrounding ESAs and appropriate knowledge, skills and attitudes with the subject of HAB before writing such a letter.
 - Awareness that ESA's may potentially exacerbate certain client presenting concerns and may interfere with treatment of certain presenting concerns
 - Clear boundaries and limit-setting appropriate to ADA, local/state/federal policies and laws
- Working with animal trainers, behaviorists, or veterinary behaviorists to ensure that the clinician remains within their scope of practice.
 - A plan for addressing appropriate animal, client, and public health/welfare
 - Resource sheet and client take-home packet
 - Clinicians should never evaluate an animal

STEP I:APPROACH LIKE ANY OTHER ETHICAL DILEMMA

Understand the origins and intentions of the ESA designation, as well as what makes HAIs potentially helpful AND potentially harmful

- Liability (provider and client)
- Professional Competency & Scope of Practice
- Client Awareness/Knowledge/Fit
- Animal Welfare
- Public Safety
- Rationale for ESA inclusion
- Additional language relevant to appropriate boundaries in the letter

STEP 2: MAKE A DECISION

Yes

- Clear & Direct link to Treatment Plan
- Psychoeducation
- Specific Language in Letter of Support
 - Time limit for re-evaluation
 - You cannot endorse or predict the animal's temperament, training, or behavior
 - You are supporting the ESA designation only for ______, and do not support or condone the animal's access outside of
 - Your support is contingent upon ______
 animal care/welfare conditions being met
 - You reserve the right to revoke support if
 - (Leslie's preference) You will report suspected or observed animal cruelty, abuse, or neglect in accordance with

No

- Empathy & psychoeducation
- Explanation of "No"
- Discuss appropriate alternatives for incorporating HAB into client's mental health goals
- Detailed documentation of exchange
- Consider formal policies and procedures to support your decision to decline

DOCUMENTING 'YES'

Recommended Notes & Forms

- Clinical note documenting ethical decision making process, describing clear rationale for support, document appropriate consultation to stay within scope of practice (to stay in client file).
- Client Contract (confidential, copy goes in file, optional copy to go home with client)
- Client Psychoeducation Packet (copy goes home with client, copy stays in client file)
- Letter of Support (to be shared with housing provider)

Sample ESA Documentation Letter

The presence of this emotional support animal in's dwelling may help ameliorate the symptom of a specific disability, thus enhancing's quality of life. Therefore, I recommend the animal's designation as an emotional support animal for for I2 months under the following conditions:
is currently under my care and attends appointments on a regular basis
The emotional support animal is included as an aspect of's treatment plan and is directly relevant to's goals for treatment
has appropriate resources to effectively provide adequate care (food/exercise/veterinary) for the animal
agrees to attend to and provide for the animals' mental and physical wellbeing and the animal's heath which will be evaluated and confirmed by an appropriately licensed and credentialed veterinarian at least twice per calendar year
agrees to avoid misrepresenting this animal as a service animal and to obey pet policies in all places outside the client's dwelling
As discussed above, the presence of this emotional support animal in's dwelling is intended as a housing accommodation only. I cannot endorse this particular animal's training, temperament, or suitability for interaction with the public. I do NOT condone nor recommend that this animal has public access rights outside of's home in places that are not normally designated as pet-friendly. I cannot guarantee safe interactions between the emotional support animal and the public. I reserve the right to withdraw my endorsement before the expiration date if the above conditions are not met.

Client Signature/Date

Provider Signature/Date

SAMPLE CLIENT CONTRACT

- Document a clear and direct link between the ESA and the client's treatment plan, including specifics as to how the HAB will be incorporated.
- A statement that the counselor's letter of support is contingent upon certain animal welfare conditions being met.
- A statement that the counselor reserves the right to revoke the endorsement if the animal is misrepresented or accompanies the owner in situations that are only accessible to a service animal (e.g. shops/stores, restaurants, schools, places of employment).

Date of Issue: Date of Expiration:

The purpose of this document is to serve as a contract between (<u>Clinician Name & Credentials</u>) and (<u>Client Name</u>) regarding (<u>Clinician's Name & Credentials</u>)'s provision of documentation supporting an Emotional Support Animal as a reasonable accommodation for (<u>Client Name</u>)'s specific mental health disability. (<u>Client Name</u>)'s relationship with the ESA will be incorporated into his/her treatment plan in the following ways:_______.

(Clinician Name & Credentials) agrees to support the accommodation of an ESA for (Client Name) under the following conditions:

(Client Name) demonstrates an understanding that ESA's are different from Service or Therapy animals and agrees to avoid misrepresenting his/her ESA as a Service or Therapy Animal.

(Client Name) agrees to omit ESA accompaniment in public contexts not protected by the Fair Housing Act of 1988 including, but not limited to: schools, places of employment, stores/shops, restaurants, and event venues (unless the public context is otherwise designated as pet-friendly).

(Client Name) will reliably provide for the ESA's mental and physical wellbeing in the following ways:

Provide adequate nutrition, exercise, grooming, and veterinary care for the ESA.

Avoid neglect and/or abuse by practicing force-free training methods and attending to Brambell's Five Freedoms (see client take home packet).

Provide (Clinician Name & Credentials) with documentation of an evaluation of the animal's overall state of health, from a licensed veterinarian, no less than twice per year.

If the above conditions are not sufficiently met or addressed, (Clinician Name & Credentials) reserved the right to withdraw his/her support for an ESA accommodation before the expiration date.

CLIENT TAKE HOME PACKET CONTENT RECOMMENDATIONS

- Clear and developmentally appropriate psychoeducation about all laws, policies, legislation, and risks relevant to ESAs.
- Clear and developmentally appropriate psychoeducation about local, state, and federal laws regarding all
 companion animals, including licensing and vaccination requirements, companion animal liability laws, and other
 ordinances relevant to companion animals.
- Resources and recommendations about animal care, training, and socialization, that may increase the likelihood of
 a positive pet ownership experience. Specific recommendations on subsequent slides.



DOCUMENTING "NO"

- Respond with empathy, psychoeducation, and viable alternatives as appropriate and document this exchange.
 - Providing psychoeducation and a clear explanation of the rationale behind a counselor's decision is crucial for the client's understanding as well as for professional advocacy surrounding the therapeutic application of the HAB.
 - Often, clients do not realize the limitations involved with an ESA and mistakenly believe that ESAs have the same access rights as service animals
 - Many clients are also unaware of the risks involved for the animal as well as for their own personal liability.

Sample Denial Letter Content

After discussing your specific presenting concerns and request for an Emotional Support Animal (ESA), (Clinician Name & Credentials) has evaluated an ESA accommodation is not an appropriate accommodation for your specific presenting concern at this time, due to one or more of the following:

Conflict with provider policy;

- **ESA** would not constitute a reasonable accommodation in the client's present context;
- Client is seeking the animal to fulfill a role outside the scope of ESA access rights;
- Significant barriers exist for adequate animal care or animal ownership;
- Risks associated with ESA ownership outweigh potential benefits;
- Contraindication with recommended course of treatment.

Although (Clinician Name & Credentials) has deemed that an ESA is not medically necessary or appropriate for you at this time, (Clinician Name) appreciates the potential benefits that healthy human-animal interactions offer to many people. Thus, (Clinician Name & Credentials) recommends the following alternative avenue(s) for experiencing human-animal bonding:

(List recommended alternatives)

ALTERNATIVES

Even without an ESA designation, skilled counselors have many options for including the client's relationships with animals into therapeutically meaningful interventions.

Outside of Sessions

- Incorporating client's relationship with his/her own pet (without bringing pet to session)
 - Discussing relational learning
 - Encouraging other wellness goals (physical, social, relational)

If Pet ownership is not a viable option: Volunteer work, pet sitting, temporary foster

In Sessions (or in office)

- Professionally directed AAIs (requires extensive formal training for provider)
- Diamond Model
- Animal Visitation Programs



ALTERNATIVES: THERAPEUTIC PET OWNERSHIP

- Many individuals do not need their animal to have an ESA designation to experience beneficial HAB/HAIs!
- Offers the same potential cardiovascular, relational, emotional benefits common to all positive HABs
 - Does not require a provider's involvement, but may be enhanced with provider involvement
- May be Integrated into a Wellness Plan with a Provider
- Risks: Animal expenses, animal grief and loss, insurance/liability
 - costs associated with responsible pet ownership and able to work those into their budget
 - state, local, and federal laws relevant to companion animals
 - ability status when selecting a pet (size, activity level, etc)
 - pet loss will eventually accompany pet ownership





PET OWNERSHIP ALTERNATIVES FOR HAB+HAI

For some, pet ownership might not be the right choice for their current life situation or caregiving abilities. Even so, there are many ways to include human-animal bonding into someone's life!

- Animal-related volunteer work (zoos, animal shelters, etc.)
- Fostering pets
- Pet-sitting
- Classroom pet
- Visiting places where animals are present (e.g. friends' houses, local dog parks, accredited zoos/sanctuaries, the wild)

HAB RESOURCES FOR ALL CLIENTS

- More and more providers are recognizing the important role that pets have in client's lives. As such, providers have an opportunity to offer resources for optimal wellness in these important relationships. I strongly recommend that all providers familiarize themselves with the following and have available for clients:
 - One Welfare Model: A Framework to Improve Animal Welfare & Human Wellbeing
 - Brambell's 5 Freedoms: The Basic Animal Rights
 - Reduced cost pet vaccine and spay/neuter programs, pet food/supply pantries, and other pet-focused assistance programs
 - Pet-friendly shelters and emergency housing resources
 - Copies of local animal statutes, laws, and policies
 - Basic Pet Nutrition Guidelines
 - Humane Training Resources (details on next slide)



HUMANE TRAINING RESOURCES

- Fun Fact: Animal Training is an unregulated industry, so there are lots of misinformed and dangerous professionals out there.
- Appropriately qualified animal trainers use Positive Reinforcement + <u>Least Invasive Minimally Aversive Methods</u>
 (<u>LIMA</u>) and ENTIRELY AVOID Positive Punishment and Negative Reinforcement (including choke, prong, or e-collars)
- Recommended Consultants/Resources:
 - Certification Council for Professional Dog Trainers (CCPDT): https://www.ccpdt.org/
 - Force Free Dog Training: https://www.forcefree-dogtraining.org/
 - Fear Free Pets: https://fearfreepets.com/
 - Karen Pryor Academy: https://karenpryoracademy.com and book "Don't Shoot the Dog"
 - The Pet Professional Guild Association: https://petprofessionalguild.com/
 - Byrnes, C. (2008). What is my Dog Saying: Canine Communication 101. CD-rom available at http://risevanfleet.com/shop/product/what-is-my-dog-saying/





FOR MORE INFORMATION:

Printable and Concise FAQ & Fact Sheet

U.S. Department of Justice (2015). Frequently asked questions about service animals and the ADA. Civil Rights Division, Disability Rights Section.

https://www.ada.gov/regs2010/service_animal_qa.html

Additional Training in AAIs in Counseling

Idaho State University Department of Counseling

Certificate Program in Animal Assisted Interventions in Counseling

https://www.isu.edu/counseling/programs/animal-assisted-interventions-certificate/

RESOURCES

Industry-Leading Organizations

- International Association of Human-Animal Interaction Organizations (IAHAIO)
- Animal Assisted Interventions International (AAII)
- International Society for Anthrozoology (ISAZ)
- Pet Partners (formerly called the Delta Society)

Foundational Resources

- Chandler, C. (2017). Animal Assisted Therapy in Counseling. New York: Routledge.
- Fine, A.H. (2019). Handbook on Animal Assisted Therapy: Foundations and Guidelines for Animal-Assisted Interventions. Academic Press.
- Peralta, P. & Fina, A.H. (2021). The Welfare of Animals Involved in Animal Assisted Interventions. Springer.
 IBSN: 978-3-030-69586-6.
- Byrnes, C. (2008). What is my Dog Saying: Canine Communication 101. CD-rom available at http://risevanfleet.com/shop/product/what-is-my-dog-saying/
- Tedeschi, P. & Jenkins, M. (2019). *Transforming Trauma: Resilience And Healing Through Our Connections* With Animals. Lafayette, LA: Purdue University Press

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Want to know more about our AAI Certificate Program? Click: https://www.isu.edu/counseling/programs/animal-assisted-interventions-certificate/