

Emotional Support Animal Policy and Agreement

❖ **Grove City College reserves the right to amend this policy and agreement at any time.**

Grove City College (“GCC” or “College”) is committed to providing equal access and opportunity to individuals with disabilities. This policy explains the requirements applicable to an Emotional Support Animal (ESA). Although it is the policy of Grove City College that animals of any kind are generally prohibited from any type of college housing, Grove City College will consider requests for an ESA, in accordance with the Fair Housing Act, by an individual with a significant mental health disability. **Emotional Support Animals are NOT permitted in college housing at any time without first receiving approval from the Director of Disability Services.** Even if the student is requesting an ESA, any unauthorized animals must be removed while the student navigates the request process. Individuals found with an unauthorized animal in college housing will be subject to disciplinary sanctions.

Definitions

Emotional Support Animal: *a category of animals that provide necessary emotional support to an individual with a mental or psychiatric disability that alleviates one or more identified symptoms of an individual’s disability, but which are not considered Service Animals under the ADAAA and GCC’s Service Animal Policy.*

Unlike “Service Animals” Emotional Support Animals are not recognized by the Americans with Disabilities Act (ADA). Therefore, ESAs do **NOT** have the same access rights that are afforded to Service Animals. ESAs that are approved under this policy are not permitted inside campus buildings and facilities except for the assigned room of the student.

In most cases, ESAs provide the necessary support without any formal training or certification. Dogs are commonly used as ESAs, but other animals (**as deemed appropriate**) may serve as an ESA.

Owner: The Owner is the resident student who has an approved ESA in College housing under this procedure.

College Housing: Any building or facility owned or operated by the College for the purposes of housing residential students.

Procedure for Requesting an Emotional Support Animal:

An Emotional Support Animal (ESA), when approved is considered a housing-related accommodation. As such, an ESA request follows the general procedures outlined in the “Housing Accommodation Policy” and the requirements detailed below. In the event the requirements and procedures in this policy conflict with the Housing Accommodation Policy, the ESA policy shall take precedence. The Housing Accommodation Policy can be found on the Disability Services page of the college website, or you may contact the Disability Services Office directly to request a copy.

A student who wishes to request an ESA must contact the Disability Services Office **at least 60 days** in advance of the semester for which an ESA is requested so that appropriate arrangements regarding accommodation determination, placement, roommates, etc. can be made. A student may request an ESA accommodation at any time. However, while the college will make every attempt to accommodate the request, appropriate resources may not be available. It is possible for an ESA to be approved, but the animal may not be allowed on college grounds until the following semester or next housing cycle.

Documentation:

Grove City College is concerned about the growing number of questionable website services that offer to "certify" your ESA or to create "ESA letters" for a set price, based on very limited information.

Under the Fair Housing Act, a housing provider may request reliable documentation when an individual requesting a reasonable accommodation has a disability and disability-related need for an accommodation that are not obvious or otherwise known. In HUD's experience, such documentation from the internet is not, by itself, sufficient to reliably establish that an individual has a non-observable disability or disability-related need for an assistance animal. (Excerpt from 2020 HUD Guidance)

There is no formal, recognized certification of ESAs, and such letters will rarely provide the information necessary to support your request for accommodation and are not viewed by Grove City College as a reliable source of information.

Documentation of the significant need for an Emotional Support Animal should follow the Disability Services guidelines for documentation of a disability and should include the following information toward determining whether an ESA is needed for the student to have equal access to college housing:

1. Generally, current documentation is required from a reliable, licensed, third party (no conflict of interest) medical professional (e.g., physician, psychiatrist, psychologist, physician's assistant, nurse practitioner, licensed clinical social worker, or other mental health professional) who has developed a therapeutic relationship with the student and understands their functional limitations.
2. Statement regarding how the need for the animal would help to alleviate symptomology of the resident/student to use and enjoy the living arrangements provided by the College.
3. Documentation must include the name, title, and professional credentials of the evaluator, including information about licensure or certification, and complete contact information (i.e. name, address, and phone number of practice). The documentation must speak to the student's current need and not past or previous conditions.
4. Generally, we accept documentation from providers in Pennsylvania or the student's home state.
5. Students requesting an ESA must also provide the "**Request of Information**" form to medical professional providing the assessment. This policy and requirements must also be reviewed in determining if the proposed ESA would alleviate or exacerbate the student's symptomology.
6. Students must also complete the "**Emergency Contact**" and "**Proof of Veterinary Care**" forms. All necessary forms are located at the end of this policy.

Standards for Determining if an Emotional Support Animal is Reasonable:

- A. Grove City College reserves the right to place an individual with an approved ESA in a single room.
- B. For all ESA requests, the Director of Disability Services will consult with the appropriate Student Life personnel. All decisions will be evaluated on a case-by-case basis. A request for an ESA may be deemed unreasonable if the presence of the animal:
 1. imposes an undue administrative and/or financial burden.
 2. fundamentally alters College housing policies; and/or

3. poses a direct threat to the health and safety of others or would cause substantial property damage to the property of others, including College property.
- C. Grove City College may consider the following factors as evidence in determining whether the presence of the animal is reasonable, but are not limited to:
 1. The space available is insufficient to house the animal and the necessary cage/crate to hold the animal.
 2. The presence of the animal would force another individual from individual housing (i.e. serious allergies).
 3. The presence of the animal otherwise violates individuals' right to peace and quiet/enjoyment within the residence halls.
 4. The animal is not housebroken or is not able to live with others in a reasonable manner. The College has determined that the residence hall setting, in most cases, is not an appropriate environment to raise a young puppy. Generally, dogs must be at least 1 year in age and cats at least 6 months, be spayed or neutered, and have received their first rabies vaccination before they can live in College housing.
 5. The animal does not meet city, county, and/or state ordinances.
 6. The animal poses or has posed in the past a direct threat to the safety/health of the individual or others such as aggressive behavior towards, or injuring the individual or others, the potential transmission of zoonotic diseases, or presents safety concerns regarding containment that cannot be sufficiently mitigated in the communal living setting.
 7. Care for the animal would require the use/storage of "live bait".
 8. The animal causes or has caused excessive damage to housing beyond reasonable wear and tear.
 9. Generally, only one ESA is allowed for a student to fulfill the intent of the Fair Housing Act requirement, and only one animal may be housed in a single unit. If more than one resident in the same unit has need for an ESA or service animal in the same unit, the College reserves the right to arrange alternate housing for one resident.

Owner Responsibilities:

If the College grants an Owner's request to live with an ESA, the Owner is solely responsible for the custody and care of the ESA and must meet the following requirements:

1. The Owner must abide by current city, county, and state ordinances, laws, and/or regulations pertaining to licensing, vaccination, and other requirements for animals. It is the Owner's responsibility to know and understand these ordinances, laws, and regulations, which may include a vaccination certificate. The College reserves the right to request documentation showing that the animal has been licensed.
2. The Owner is required to clean up after and properly dispose of the animal's waste in a safe and sanitary manner and, when provided, must use animal relief areas designated by GCC. The animal will not be bathed or its cage/crate, or bedding cleaned, using student housing or college facilities.
3. The Owner is required to ensure the animal is always well cared for. Any evidence of mistreatment or abuse may result in immediate removal of the ESA and/or discipline for the responsible individual.

4. GCC will not ask for or require an individual with a disability to pay a fee or surcharge for an approved ESA.
5. The owner is financially responsible for the approved ESA, including for any bodily injury or property damage. The owner may be charged for any damage caused by his or her ESA beyond reasonable wear and tear to the same extent that it charges other individuals for damages beyond reasonable wear and tear. The Owner's living accommodations may also be inspected for fleas, ticks, or other pests. If fleas, ticks, or other pests are detected through inspection, the residence will be treated using approved fumigation methods by a College-approved pest control service. The Owner will be billed for the expense of any pest treatment above and beyond standard pest management in the residence halls. The college shall have the right to bill the Owner's account for unmet obligations under this provision.
6. The Owner must fully cooperate with the College personnel with regard to meeting the terms of this Policy and developing procedures for care of the animal (i.e., cleaning the animal, feeding/watering the animal, designating an outdoor relief area, disposing of feces, etc.).
7. ESAs may not be left overnight in College housing to be cared for by any individual other than the Owner. If the Owner is to be absent from his/her residence hall overnight or longer, the animal must accompany the Owner. The Owner is responsible for ensuring that the ESA is contained (caged or crated) as appropriate when the Owner is not present during the day while attending classes or other activities. The College reserves the right to inspect the enclosure to be used in containing the animal.
8. The Owner agrees to abide by all the equally applicable residential policies that are unrelated to the individual's disability such as assuring that the animal does not unduly interfere with the routine activities of the residence or cause difficulties for individuals who reside there.
9. The animal is allowed in College housing only if it is necessary because of the Owner's disability. The Owner must notify the Director of Disability Services in writing if the ESA is no longer needed or is no longer in residence. To replace an ESA, the new animal must be necessary because of the Owner's disability and the Owner must follow the procedures in this Policy and the Housing Accommodation Policy when requesting a different ESA.
10. GCC shall not be required to provide care or food for any ESA including, but not limited to, removing the animal during emergency evacuation events such as a fire alarm. Emergency personnel will determine whether to remove the animal and GCC may not be held responsible for the care, damage to, or loss of the animal.
11. The Owner must provide the College with the name and contact information for someone who does not reside in College housing and who can take responsibility for the animal within **48 hours** should the owner be unable or unavailable to care for it.
12. The individual must provide written consent for the Disability Services Office to disclose information regarding the request for and presence of the ESA to those individuals who may be impacted by the presence of the animal including, but not limited to, Student Life personnel and potential and/or actual roommates(s)/neighbor(s). Such information shall be limited to information related to the animal and shall not be information related to the individual's disability. The individual further recognizes that the presence of the ESA may be noticed by others residing or visiting the dwelling and agree staff may

acknowledge the presence of the animal and explain that ESAs are permitted under certain circumstances for an individual with a disability.

Access to Facilities:

An ESA must be contained within the Owner's assigned living space (i.e. room, suite, apartment) except to the extent the owner is taking the animal out for natural relief. When the ESA is outside the assigned living arrangements, it must be in an animal carrier or controlled by a leash or harness. ESAs, as approved under this policy, are not allowed in any college building other than the residence hall in which the student is assigned.

Guest Procedure:

The College's provision for ESAs applies only to currently enrolled students residing in College housing, and it only applies to the Owner's room. An Owner who has an approved ESA for the Owner's residence may not take their ESA to other College rooms/residences. All other personnel or individuals (e.g. guests) are not allowed to bring animals into College residences. This includes day visitations, overnight stays, or weekend visits, even if such visits are welcome by roommates and others. Any student who takes an ESA to a different student's College residence or otherwise permits unapproved animal visits in College residences will be referred to Student Conduct for a code violation, may be assessed a monetary fine of \$200 dollars, and will have their ESA approval revoked.

Dominion and Control:

Notwithstanding the restrictions set forth in this policy, the ESA must be properly housed and restrained, or otherwise under the control of the Owner at all times. No Owner will allow the animal to go loose or run at large. If the Owner/animal does not abide by the above statement, the animal is subject to capture, confinement, and immediate removal from College housing.

Approval/Appeals Process:

1. A student requesting permission to keep an Emotional Support Animal in College housing must make a formal request to the Director of Disability Services and provide documentation as outlined in the Housing Accommodation and Emotional Support Animal policies.
2. After the student has submitted all appropriate documentation, the student must meet with the Director of Disability Services to determine eligibility in an interactive, case-by-case evaluation. Following the meeting, the Director of Disability Services will consult with the Office of Student Life & Learning. Following discussion with appropriate personnel in that office, the Director of Disability Services will determine if the request is appropriate.
3. The student will be informed, in writing by the Director of Disability Services, of the decision within seven (7) business days. If approved, a follow-up meeting may be arranged with the Director of Disability Services. This policy will be carefully reviewed with the student at that time.
4. Upon approval of an Emotional Support Animal, residential building staff will be notified as appropriate.
5. Upon approval of an Emotional Support Animal, the student's roommate(s) or suitemate(s) will be notified (if applicable) to solicit their acknowledgement of the approval, and that the approved animal will be residing in shared assigned living space.

6. A student whose request for an Emotional Support Animal is not approved will have the opportunity to provide additional and/or new documentation to have the request reconsidered by the Director of Disability Services. If the request is still not approved, the student would have the opportunity to appeal the decision. All appeals must be submitted in writing by the student to the Vice President of Student Life and Learning within seven (7) days of the date of the denial. The student will receive information about the appeals process upon notification of the denial decision regarding their request.

Removal of Emotional Support Animal:

The College has the authority to exclude an Emotional Support Animal temporarily or permanently from its grounds or facilities if the animal's behavior is unruly or disruptive or if the animal is in ill health or is habitually unclean.

An Emotional Support Animal will be removed from College property after a single occurrence of biting or other aggressive behavior. The ultimate decision to exclude an Emotional Support Animal from the College will be made by the Vice President of Student Life and Learning in collaboration with the Director of Disability Services.

Grove City College will take appropriate measures, up to and including revocation of approval for an ESA if, among other reasons:

1. The animal poses a direct threat to the health or safety of others or causes substantial property damage to the property of others.
2. The animal's presence results in a fundamental alteration of a College program.
3. The Owner does not comply with the Owner's Responsibilities set forth above; or
4. The animal or its presence creates an unmanageable disturbance or interference with the College community.

In the event an ESA needs to be removed, the Owner must contact their off-campus emergency contact to retrieve the animal. Students will have **48 hours** to make appropriate arrangements.

- a. If the student fails to comply within the stated time frame, the College may have the animal removed to the nearest, appropriate animal shelter. Additionally, failure to comply with the order of removal will result in a student code of conduct violation.
- b. In the event an ESA is placed in a shelter, the associated cost is the responsibility of the Owner. Grove City College will not be held responsible for such cost.
- c. If an Emotional Support Animal is removed for any reason, the Owner is expected to fulfill his/her housing obligations for the remainder of the housing contract.
- d. The College will base determination upon the consideration of the behavior of the animal at issue, and not on speculation or fear about the harm or damages an animal may cause. Any removal of an animal will be done in collaboration with the Housing Committee.

Pennsylvania Exotic Wildlife Policy:

- ❖ These Pennsylvania statutes represent the state's exotic pet laws. "Exotic wildlife" includes all bears, coyotes, lions, tigers, leopards, jaguars, cheetahs, cougars, wolves, and any crossbreed of these animals. The commission may issue a permit to a person to act as an exotic wildlife dealer. No permit shall be granted by the commission until it is satisfied that the provisions for housing and caring for the exotic wildlife and protection for the public are proper and adequate and in accordance with the standards which may be established by regulations. It is unlawful to release any exotic wildlife into the wild, fail to exercise due care in safeguarding the public, or recklessly engage in conduct that places another person in danger of attack from exotic wildlife (Animal Law.info, 2016).
- ❖ No student shall live on-campus with an exotic animal even with the proper documentation of exotic wildlife permit. The above Pennsylvania statute only recognizes dealers of these animals and not for use of any other purpose.

Non-Retaliation:

Grove City College will not retaliate against any person because that individual has requested or received a reasonable accommodation in College housing, including a request for an Emotional Support Animal. Any student who feels they have been discriminated against, on grounds of their disability, may file a grievance through the College's grievance procedure. The College's Student Grievance Policy is posted on myGCC under the Risk Management & Safety section of Campus Services.

Emergency Procedures:

- **Fire Alarm/Drill:** If the student is in the residence hall and must evacuate due to a fire alarm or drill, the student can take the animal outside with them provided the animal is under the student's control (i.e., leashed or in a travel carrier). If the student is not in the building, they cannot enter the building until cleared by emergency personnel or staff.
- **Tornado/Severe Weather:** If the student must evacuate the building to a shelter location due to a tornado warning, drill, or other severe weather conditions, the animal must be left in the room in its crate. In the rare situation that the student is letting the animal out for natural relief when an alert is made, they should move to a safe location with the animal directly. The animal generally should not be taken to the shelter location for the following reasons:
 - Other students on campus have severe allergies to animals. Being in a confined space for a prolonged period creates a greater risk of serious allergic reaction.
 - If kept confined for long periods, particularly in a crowded shelter area, animals may become agitated and/or aggressive, putting those around them at risk of harm.
 - Shelter areas may have no space for animal relief, and an animal leaving waste in the shelter area could pose health risks for those around them.
- **Shelter-in-Place Order:** If a shelter-in-place order is made, the student can shelter-in-place with the animal in their living space, if already there. If the student is elsewhere on campus when the order is made, the animal should already be crated in their room, and the student should remain at the current location following all Campus Safety, other law enforcement, and/or staff directives.

Reminder: GCC shall not be required to provide care or food for any ESA including, but not limited to, removing the animal during emergency evacuation events such as a fire alarm. Emergency personnel will determine whether to remove the animal and GCC may not be held responsible for the care, damage to, or loss of the animal.

Acknowledgement and Release of Consent

By my signature below, I verify that I have read, understand, and will abide by the requirements outlined in this policy. I agree to provide additional information required to complete my request for an Emotional Support Animal in College housing.

I have read and understood the Emotional Support Animal Policy and Agreement and I agree to abide by the requirements applicable to Emotional Support animals. I understand that if I fail to meet the requirements set forth in this policy, Grove City College has the right to remove the Emotional Support Animal, and I will still be required to fulfill my housing obligations for the remainder of the housing contract.

I furthermore give my consent to the Director of Disability Services to disclose information to relevant offices and individuals who would be impacted by the presence of an Emotional Support Animal. (i.e. Student Life staff, Custodial staff, potential/actual roommate(s)/neighbor(s)).

I understand that this information will be shared with the intent of preparing for the presence of an Emotional Support Animal and/or resolving any potential issues associated with the Emotional Support Animal.

I understand the stipulations associated with the removal of an Emotional Support Animal. In the event of a removal, I agree to honor my housing obligations for the remainder of the housing contract.

These rules and expectations have been presented to me on this date, and I understand that if this agreement is violated, I may be subject to charges under the Student Code of Conduct.

Owner's Name (Print)

Date

Owner's Signature

Director of Disability Services

Date

Student Life and Learning Representative

Date

If Owner is under 18 years old:

By signing below, you represent that you are the parent or legal guardian of the Owner, who is a minor. You acknowledge that you have read and understand the policy and that you agree to abide by its terms.

Parent/Guardian's Printed Name

Date

Parent/Guardian's Signature

Emergency Contact Information

In the event of an emergency in which I, the Owner, am unable to care for or my approved ESA and it must be removed, the contact person(s) stated below will be responsible for the care of my ESA (***All information is required to be completed for the primary contact – Please print.***): By signing this agreement, I agree to pick-up and care for the ESA within **48 hours**, until the Owner is able to resume care.

NOTE: The emergency contact(s) must reside off campus.

Primary Off-Campus Contact (required):

Name: _____

Relationship to Owner: _____

Phone: _____

Email: _____

Signature: _____

Secondary Off-Campus Contact (optional):

Name: _____

Relationship to Owner: _____

Phone: _____

Email: _____

Signature: _____

This emergency contact information may be shared with:

- Office of Student Life & Learning
- Campus Safety Office
- Student Health Center

After this page is received, Disability Services staff will reach out to the primary contact listed to verify their contact information. In the event the contact information for this individual changes, please be sure to reach out to our office to update the information. If the individual(s) above are not able to be reached, the College may seek alternative arrangements to place the animal in the care of a professional agency or shelter at the owner's expense.

Signature of Staff Verification: _____ Date: _____

Grove City College

Animal Documentation and Certification of Veterinary Care

Student's Name: _____

Animal's Name*: _____ Type of Animal: _____

Breed: _____ Colorings/Markings: _____

*Attachment Required: A photo of the animal (clearly visible and in good lighting) must be attached to this paperwork or e-mailed to DisabilityServices@gcc.edu by the student.

Size of Cage/Crate Needed for Containment: _____

Age _____ Weight _____ Gender _____ Spay/Neuter _____ (yes) _____ (no)

License # (if applicable) _____ (Grove City College requires renewal each year.)

_____ Vaccination verified. Date of Vaccination _____

(Rabies shot 1st shot lasts one year; subsequent shots last 3 years.)

_____ Veterinarian check-up verified. Date of check-up: _____

Notes:

(Student can submit a letter from the Veterinarian certifying all the above information)

****Veterinary signature required****

Signature: _____

Clinic name, address, and telephone number:

ESA REQUEST FOR INFORMATION FORM

Student's Name: _____

Grove City College ID #: _____

Re: Proposed ESA:

Animal Name: _____

Type of animal: _____

Age of animal: _____

The above-named student has indicated that you are the licensed healthcare professional (e.g., physician, psychiatrist, psychologist, physician's assistant, nurse practitioner, licensed clinical social worker, or other mental health professional) who has suggested that having an Emotional Support Animal (ESA) in the residence hall will be helpful in alleviating one or more of the identified symptoms or effects of the student's disability. Generally, we will accept documentation from providers in the state of Pennsylvania or the student's home state who have personal knowledge of the student, consistent with their professional obligations. So that we may better evaluate the request for this accommodation, please answer the following questions:

The health care provider need not use this specific form; however, all information requested is necessary for the institution to have to consider the request for an ESA; the form is provided as a convenience.

Information About the Student's Disability

Federal law defines a person with a disability as someone who has a physical or mental impairment that substantially limits one or more major life activities. That suggests that a diagnosis (label) does not necessarily equate with a disability (substantial limitation). What is the nature of the student's mental health impairment (that is, how is the student substantially limited?)

Documentation of disability must come from a source with sufficient direct personal knowledge of the individual to clarify the need for the ESA and the nexus between the disability and the presence of the animal in housing.

When did you first meet with the student regarding this mental health diagnosis?

What is the nature of your meetings (i.e., face-to-face meetings or virtual interactions)?

When did you last interact with the student regarding this mental health diagnosis?

Does the student require ongoing treatment?

Information About the Proposed ESA

What specific symptoms is this student experiencing, and how will those symptoms be mitigated by the presence of the ESA? General assessments are typically insufficient. For example, a statement that “The animal alleviates anxiety” is too general and does not explain how the animal may alleviate the symptoms of this student’s disability.

Is there evidence that an ESA has helped this student in the past or currently? If not, why do you believe this may be an effective support for the student now?

Dogs and cats are most often requested as ESAs and seem best suited to adapting to the communal living setting of the college residence hall. If another type of animal is suggested for this student, please explain why you believe that this animal is a better choice.

Importance of ESA to Student’s Well-Being

Have you discussed the responsibilities associated with properly caring for an animal while engaged in typical college activities and residing in campus housing? Do you believe those responsibilities might exacerbate the student’s symptoms in any way? (If you have not had this conversation with the student, we will discuss it with the student at a later date.)

Please address the likely impact on the student should the following scenario occur: once the student is living with the animal in the student housing unit, the animal is permanently removed from the unit because of a violation of policy (e.g. the animal injures someone or destroys property) and balance this impact, if any, against the benefit that you expect the animal to provide to the student.

This student was provided with a copy of the Emotional Support Animal (ESA) policy, which includes the rules and restrictions surrounding the presence of an animal in residence in College housing. Has the student shared the full policy with you?

Yes No

Thank you for taking the time to complete this form. If we need additional information, we may contact you at a later date. We recognize that having an ESA in the residence hall can be a real benefit for someone with a significant mental health disorder, but the practical limitations of our housing arrangements make it necessary to carefully consider the impact of the request for an ESA on both the student and the campus community.

Please provide contact information, sign, and date this questionnaire (below), and return it to the Disability Services Office. The mailing address is -

Grove City College
Henry Buhl Library (Academic Resource Center)
ATTN: Disability Services Office
100 Campus Drive
Grove City, PA 16127.

Our general office email is disabilityservices@gcc.edu, and additional contact information is available on [our webpage](#).

Contact information: _____

Address: _____

Telephone: _____

FAX and/or Email address: _____

Professional Signature: _____

License #: _____

Date: _____

Student to complete: I certify that personnel with Grove City College's Disability Services Office can receive this information about me and my ESA for 60 days after the completion date on this form.

Signature: _____ Date: _____