

## SERVICE ANIMALS

### I. Policy Section

14.0 Risk Management

### II. Policy Subsection

14.10 Service Animals

### III. Policy Statement

Grand Rapids Community College (GRCC) will abide by applicable state and federal laws related to service animals on campus. Pursuant to the procedures set forth in this policy, GRCC will permit service animals, as defined herein, to accompany people with disabilities on property owned or controlled by the College where the public is normally allowed. GRCC will appropriately modify any policies, practices, or procedures which may prevent an individual from utilizing a service animal, unless to do so would fundamentally alter the nature of the service or program GRCC is providing or would be a violation of a legitimate safety requirement. GRCC will respect the privacy of individuals using service animals and, except as specified in this policy, will limit inquiry to the permissible questions described herein.

### IV. Reason for the Policy

This policy is written to provide clear guidance on the use of service animals by students, staff or visitors on campus and to comply with the Rehabilitation Act of 1973 (including Section 504), the Americans with Disabilities Act (including Title II and Title III), Michigan's Persons with Disabilities Civil Rights Act and any other applicable laws, rules and/or regulations.

### V. Entities Affected by this Policy

All employees  
Students  
Applicants  
College guests  
Independent contractors  
Board of Trustees  
Community and constituencies accessing services  
Volunteers  
Vendors

VI. Who Should Read this Policy

All employees  
Students  
Applicants  
College guests  
Independent contractors  
Board of Trustees  
Community and constituencies accessing services  
Volunteers  
Vendors

VII. Related Documents

Americans with Disabilities Act  
Rehabilitation Act of 1973\  
Michigan Persons with Disabilities Civil Rights Act

VIII. Contacts

Policy Owner: Director of Equal Opportunity Compliance  
Program Director of Disability Support Services

IX. Definitions

A. Service Animal: A service animal includes any dog that is 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 mental disability. Except as specified further herein, other species of animals, whether wild or domestic, trained or untrained, are not service animals for the purposes of this definition. The work or tasks performed by a service animal must be directly related to an individual's disability. The crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort or companionship do not constitute work or tasks for the purposes of this definition.

Examples of work or tasks that service animals perform include, but are not limited to: assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as books or a telephone, calming a person with Post Traumatic Stress Disorder during an anxiety attack, and helping persons with

psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors.

In addition, the college may permit the use of a miniature horse on the same basis as a service animal if the horse has been trained to do work or perform tasks for the benefit of an individual with a disability and after an assessment of the following factors: the type, size and weight of the miniature horse and whether the facility can accommodate these features; whether the handler has sufficient control of the miniature horse; whether the miniature horse is housebroken; and whether the miniature horse's presence in a specific facility compromises legitimate safety requirements that are necessary for safe operation.

**B. Service Animal Training Requirements:**

Service animals in training are permitted in all public facilities on the same basis as working service animals, provided that the service animal is being led or accompanied by a trainer for the purpose of training the dog and the trainer has documentation confirming that the trainer is affiliated with a recognized or certified service animal training organization. Service animals in training are not permitted in certain classrooms, offices or other areas of campus not open to the general public.

**C. Service Animal in Training:** Dogs twelve (12) months of age and older being individually trained to do work or perform tasks for people with disabilities that are at all times accompanied by a certified trainer. Puppies (dogs less than twelve (12) months old) are not permitted in college facilities.

**X. Procedures**

**A. Registration and Reasonable Accommodations –** Except as otherwise specified herein, service animals are permitted within all college facilities. Any policies, procedures, or practices prohibiting Service Animals from assisting an individual on campus will be appropriately modified, unless to do so would fundamentally alter the nature of the services GRCC is providing, or unless allowing a service animal in a specific area would be a violation of a legitimate safety requirement. An individual using a service animal in areas of the college where the public is normally permitted does not need to register with the College or submit documentation related to the animal.

1. Students may choose to request an optional identification tag for their service animal by contacting Disability Support Services (DSS), and students are further encouraged to reach out to DSS to ensure that their experience bringing a service animal to campus is a positive one, and to address any concerns regarding their service animal on campus. Students should also contact DSS regarding any accommodations they may require in addition to the use of a service animal in accordance with

the procedures identified in other college policies (including Policy 3.2 – Non-Discrimination on the Basis of Disability).

- a) Students must contact DSS and seek approval through the reasonable accommodation process relating to any request to be accompanied by a service animal in areas of campus or college facilities where the general public is not permitted.
2. Employees with a disability who wish to utilize a service animal as a reasonable accommodation in a college office or other areas of campus buildings not open to the general public must submit their request to the college's ADA Coordinator at least thirty (30) days before the animal is needed.

B. Permissible areas for service animals: Subject to applicable law, the college reserves the right to identify other facilities or areas of campus where service animals are not permitted, however, the following constitutes a non-exhaustive list of areas or facilities will generally be considered off-limits unless an exception is granted:

1. Areas where protective clothing is needed: Any room where protective clothing is required or necessary. Examples of such areas may include chemistry and biology laboratories and job training facilities.
2. Areas where there is danger to the service animal: Any room, including a classroom where there is a threat of injury or harm to the service animal. In many cases, where the threat of injury or harm is to the service animal only, the student or employee will be permitted to make the decision regarding the service animal's presence.
3. Areas where a service animal's presence would be in violation of a legitimate safety requirement.

C. Proper Restraint - Service animals must be harnessed, leashed or tethered at all times while on campus, unless such devices would interfere with a service animal's work or an individual's disability prevents the use of such devices. In cases where a service animal cannot be restrained in accordance with the aforementioned requirements, an individual must maintain control of a service animal through voice, signal or other effective controls. A service animal's handler must maintain control over the service animal at all times.

D. Permissible Questions – Except where permissible in cases involving a reasonable accommodation process (as referenced above), GRCC employees may not ask about or for any of the following regarding a service animal: the nature of an individual's disability; medical documentation; a special identification card or training documentation for the animal; or that the animal demonstrates its ability to perform the work or task.

In scenarios when it is not obvious what assistance a service animal provides, employees may only ask two questions: (1) is the animal a service animal

required because of a disability?; and (2) what work or task has the animal been trained to perform?

In the event that these questions are not answered or responses are insufficient, an individual accompanied by a service animal should be directed to Disability Support Services or the ADA coordinator. A service animal does not need to be marked, identified or have accompanying certification to be permitted on campus.

E. Allergies - Allergies or fear of an animal being in the same room as an individual allergic to animal dander are not a sufficient reason to deny access or refuse individuals using a service animal. If a situation arises where an individual using a service animal and a person allergic to animal dander must spend time in the same room or facility, they should both be accommodated by assigning them to different locations within the room or facility, if possible. Any individual in need of an accommodation should contact Disability Support Services (for students) or the ADA Coordinator (for employees). Individuals with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals.

F. Criteria for Removal - An individual with a disability may be asked to remove a Service Animal from the premises under the following circumstances: (1) where the animal is not under the handler's control, and the handler does not take effective action to control it; (2) where the animal is not housebroken; or (3) where the animal appears to be insufficiently trained, based on disruptive, dangerous or threatening behavior. When there is a legitimate reason to ask that a service animal be removed, the college must offer a person with the disability the opportunity to obtain goods or services without the animal's presence.

G. Food Establishments - Areas of the campus that sell or prepare food must allow service animals in public areas even if state or local health codes prohibit animals on the premises.

H. Waste Removal - Individuals utilizing a service animal are required, if physically able, to clean up any waste left behind and properly dispose of it. Individuals unable to do this should use a designated toileting area. This area will be determined based upon the location of the individual on campus (e.g., a student's classes, or an employee's work area). Individuals who require information regarding designated toileting areas may contact the ADA Coordinator or DSS for more information regarding designated toileting areas. GRCC employees are not required or encouraged to provide care or food for a Service Animal.

XI. Forms

N/A

XII. Effective Date

December 8, 2004

XIII. Policy History

February 2016 - Revised to clarify “fundamental alteration” exception, modify definitions, clarify when registration of an animal would be appropriate, and changed policy owner to “Director of Equal Opportunity Compliance”.

February 2018 - Revised to modify “Service Animal” definition for readability and to comply with state of law; added provisions for contacting DSS with miniature horse requests or additional accommodations. Added language regarding Student Code of Conduct and provision for optional registration for Service Animals.

February 2020 - Reviewed

February 2022 - Reviewed

May 2024 - Revised to clarify definitions and procedures.

XIV. Next Review/Revision Date

February 2026