

Procedure for Requesting a Service Animal or Assistance Animal

Issued: 11/08/2022

Last Revised: 11/08/2022

Last Reviewed: 03/01/2023

Procedure Introduction

The purpose of this procedure document is to clarify the processes and responsibilities related to the Service Animal and Assistance Animal Policy. The University acknowledges that both Service Animals and Assistance Animals (see [Definitions](#)) are utilized by individuals with disabilities. However, the University assesses the need for Service Animals and Assistance Animals differently. Individuals seeking use of a Service Animal or Assistance Animal as an accommodation may need to partake in different processes pending the type of accommodation requested.

Service & Assistance Animals in the Employment Setting (Faculty, staff and employed students)

Faculty, staff, and USC employed students seeking to bring a Service Animal or Assistance Animal to work should contact their HR Business Partner or the institution's [Office of Institutional Accessibility's Interactive Process Center of Expertise \(IPCOE\)](#) and request use of a Service Animal or Assistance Animal as a reasonable accommodation because of their disability. To better understand the need for a Service or Assistance Animal, USC may ask for documentation from a qualified treating provider that explains the need for the Service or Assistance Animal, the tasks it performs, and describes the need for the Service or Assistance Animal as it relates to the functional limitations experienced by the employee. Additional information that describes the Service Animals training may be requested.

Faculty and staff living in USC housing requesting the use of a Service Animal and Assistance Animal as a housing accommodation should contact the Office of Institutional Accessibility to request the use of a Service Animal or Assistance Animal as a reasonable housing accommodation. If approved and necessary, University Housing may notify other residents within the residential building and/or floor (as well as maintenance and security staff, as needed) that the Service Animal or Assistance Animal will be residing in an assigned living space. USC Housing and The Office of Residential Education retain the right to relocate the Owner/Handler and approved Service Animal or Assistance Animal as necessary on a case-by-case basis.

Service & Assistance Animals for Students

Students with disabilities who intend to bring a Service Animal into campus buildings may voluntarily register their Service Animal with OSAS. The owner will be provided, if desired, a courtesy document that confirms their right to be accompanied by the Service Animal on campus and, if applicable, USC Housing and the Office of Residential Education will be notified. The student may choose, but is not required, to share the courtesy document with members of the campus community.

Students seeking an Assistance Animal should contact the [Office of Student Accessibility Services](#) to request an Assistance Animal as a reasonable housing accommodation because of their disability. Generally, ADA review standards will be utilized for all Assistance Animal accommodation requests for individuals who participate in Residential Education Programs. To better understand the need for an

Assistance Animal, USC may ask for documentation from a qualified treating provider that supports the need for an Assistance Animal.

The appropriate campus unit(s) may make reasonable risk-based assessments related to Service Animals and Assistance Animals in Residential Education Programs and may work with the individual with the disability to ensure that the individual has the proper information to provide care for the animal, such as identification of relief areas.

If necessary, University Housing will notify other residents within the housing assignment (as well as maintenance and security staff, as needed) that the Service Animal or Assistance Animal will be residing in a shared assigned living space. USC Housing and The Office of Residential Education retain the right to relocate the Owner/Handler and approved Service Animal or Assistance Animal as necessary on a case-by-case basis.

Service & Assistance Animals for Guests and Visitors

It is suggested that guests and visitors with disabilities who intend to bring a Service Animal into campus buildings notify the University of the need for a Service Animal’s presence in advance of bringing the animal to campus by contacting the department to be visited or the event organizer(s) whenever possible. An individual with a disability may be asked whether a Service Animal is needed because of a disability and what work or task the animal has been trained to perform.

Assistance Animals are typically not allowed in University buildings or at University sponsored, organized, or hosted events.

Responsibilities

POSITION or OFFICE	RESPONSIBILITIES
Owner/Handler	<ol style="list-style-type: none"> 1. Provides appropriate applications and/or documentation from a qualified treating provider of the disability and the disability related need for an Assistance Animal (in the case of a student or employee) or Service Animal (in the case of an employee). 2. Ensures that the Service Animal or Assistance Animal does not unduly interfere with or disrupt the routine activities of the work environment, classroom, or residence. The Owner/Handler must always be in control of the Service Animal or Assistance Animal. Service Animals or Assistance Animals who are perceived to not be under control of the Owner/Handler are assessed on a case-by-case basis in accordance with federal law and best practices. 3. Is financially responsible for the actions of the Service Animal or Assistance Animal, including bodily injury or property damage. The Owner’s/Handler’s responsibility covers, but is not limited to, replacement of furniture, carpet, window, wall covering, and the like. The Owner/Handler is expected to cover these costs at the time of repair. 4. Is responsible for any expenses incurred in cleaning (above and beyond a standard cleaning) or for repairs to University premises, including but not limited to residence halls, that are

	<p>assessed after the student and Service Animal or Assistance Animal vacate the residence. The University will bill the student Owner's/Handler's student account for unmet obligations.</p> <ol style="list-style-type: none"> 5. Ensure the cleanup of the Service Animal or Assistance Animal's waste, and, when appropriate, must toilet the Service Animal or Assistance Animal in areas designated by the University consistent with the reasonable capacity of the Owner/Handler. Indoor Assistance Animal waste, such as cat litter, must be placed in a sturdy plastic bag and securely tied up before being disposed of in outside trash dumpsters. Litter boxes must be placed on mats so that waste is not tracked onto carpeted surfaces. The Assistance Animal's waste must be managed to prevent odors from disrupting others in the environment. 6. Is responsible for the overall health and well-being of the Service Animal or Assistance Animal, including compliance with all state and local laws concerning animals (e.g., registration, vaccinations, and tags). Owners/Handlers may be asked to provide annual documentation of the health of the animal from a licensed veterinarian. 7. May not leave a Service Animal or Assistance Animal unattended in or on any University property, other than Assistance Animals left in an individual's University housing for a reasonable period of time. Service Animals and Assistance Animals must be taken with the Owner/Handler if the Owner/Handler leaves campus for a prolonged period. A student or employee may not designate another individual to care for their Service Animal or Assistance Animal. 8. Are responsible for any fees associated with the impounding of a Service Animal or Assistance Animal and/or any fees required to secure the release of their Service Animal or Assistance Animal. 9. Agrees to adhere to USC policy as to where the approved Assistance Animal is allowed (i.e., generally in the assigned residence hall and outdoor spaces but not in other residential rooms not assigned to the Owner/Handler, other University buildings, or where safety is questioned). 10. Agrees to abide by all other residential policies. An exception to the no-animals policy does not constitute exception to any other policy. 11. Agrees to USC Housing and the Office of Residential Education's right to relocate the Owner/Handler and approved Service Animal or Assistance Animal as necessary on a case-by-case basis.
Office of Student Accessibility Services (OSAS)	<ol style="list-style-type: none"> 1. Follows ADA review practices for Assistance Animal requests for individuals participating in Residential Education Programs. 2. Receives and evaluates student accommodation requests for Assistance Animals.

	<ol style="list-style-type: none"> 3. Communicates approvals for Assistance Animals with Residential Education, Housing, security staff, maintenance, or other applicable offices as needed. 4. Securely stores student documentation, accommodation decisions, and related documents for student accommodation requests related to Assistance Animals. 5. Securely stores student documentation and related documents for voluntary registration of Service Animals. 6. Provides courtesy Service Animal letters upon student request. Students may choose, but are not required, to share the courtesy Service Animal letter with members of the USC community.
The Office of Institutional Accessibility and ADA Compliance (OIA); Interactive Process Center of Expertise (IPCOE)	<ol style="list-style-type: none"> 1. Receives and evaluates employee accommodation requests for Service Animals and Assistance Animals. 2. Communicates decisions related to Service Animals and Assistance Animals as a workplace accommodation. 3. Securely stores employee documentation, accommodation decisions, and related documents for employee accommodation requests related to Service Animals and Assistance Animals.

Procedure Details

Action #	Responsible Stakeholder	Details
1.0	Employees (Faculty, Staff, or USC Employed Students)	<ol style="list-style-type: none"> 1. Faculty, staff, or USC employed student contact the Office of Institutional Accessibility’s Interactive Process Center of Expertise to initiate accommodation request process. Email employeeada@usc.edu to submit a formal accommodation request for a Service or Assistance Animal. 2. Faculty, staff, or USC employed student must submit medical certification from a qualified actively treating medical provider for medical conditions (no diagnosis necessary) that will require the use of an Animal and how the Animal will assist the employee with their essential job functions. 3. Faculty, staff, or USC employed student, after submitting request and documentation, will receive communication from an OIA Disability Accommodation Specialist to set up a time to speak about their request, documentation, any follow-up, and next steps. 4. Faculty, staff, or USC employed student will have their full request reviewed by an OIA Disability

		<p>Accommodation Specialist to determine if an Animal can be accommodated. The HR Business Partner will be contacted to determine if the office/department/unit has any areas that would be compromised by the presence of an Animal.</p> <p>5. Individuals approved for an Animal accommodation will be provided a letter of accommodation from their OIA Disability Accommodation Specialist.</p> <p>6. Manages the interactive process with employee and supervisor(s).</p>
2.0	Students	<p>1. Students complete an application for an Assistance Animal at www.osas.usc.edu (Click on Log in -To MYOSAS to create an account). You may contact OSASFrontDesk@usc.edu should you have questions. <i>*Students with Service Animals are not required to apply for or register with OSAS but may request a Service Animal Verification form from OSAS. A completed Voluntary Service Animal Registration form can be completed and returned to OSAS to receive a Service Animal Verification letter from OSAS.</i></p> <p>2. Students must provide information/documentation from a qualified treating medical provider that would reasonably support their request for an Assistance Animal when the disability is not readily apparent. Documentation may be directly uploaded to your MYOSAS portal at www.osas.usc.edu. Service Animals do not require documentation or registration with OSAS, however a voluntary registration process exists to aid students in navigating the campus environment.</p> <p>3. Students will be contacted by an OSAS Accessibility Specialist to set up a time to speak about their request.</p> <p>4. Students will have their application and documentation reviewed for the accommodation of an Assistance Animal.</p>

		<p>5. Students approved for an Assistance Animal will be notified via email and will be provided an Assistance Animal Registration Form by OSAS.</p> <p>6. Students must complete an Assistance Animal Registration Form and return it to OSAS. The form must be accompanied by appropriate vaccination records, photo of Assistance Animal, and if applicable information regarding local licensing of the Assistance Animal.</p> <p>7. An OSAS representative will inform Housing of an approved Assistance Animal for the student.</p> <p>Housing representatives will inform appropriate parties of an approved Assistance Animal (i.e., Roommates/Housemates, Security Staff, Maintenance Staff, and Residential Education, etc.) as needed. It is strongly recommended that students wait until <i>after housing has informed appropriate parties of the approved Assistance Animal, to bring the approved Assistance Animal into their assigned residence.</i></p> <p><i>USC Housing and The Office of Residential Education retain the right to relocate the owner and approved animal as necessary on a case-by-case basis.</i></p>
--	--	--

Definitions

Term	Definition
Assistance Animal	<p>Assistance Animal means any animal, designated by a qualified medical treatment provider, that typically provides passive assistance to alleviate one or more identified symptoms of an individual’s disability. Assistance Animals are separate and distinct from Service Animals and are generally considered a housing accommodation, allowing equal opportunity to the use and enjoyment of a dwelling. A nexus must exist between the individual’s disability and the assistance the animal provides. As described in the Responsibilities and Compliance sections, Assistance Animals must stay in the individual’s residence—they generally cannot accompany the individual on daily tasks like attending class, dining, or studying in the library. While Assistance Animals are not limited to dogs, animals that are prohibited by state or local laws including but not limited to animals considered a zoonotic risk are typically not considered a reasonable Assistance Animal accommodation. Typically, the presence of only one Assistance Animal is approved per student. Additionally, health</p>

	and behavior requirements do exist and are assessed on a case-by-case basis.
Individual with a Disability	An individual with a disability is a person who has a physical or mental impairment that limits one or more of the person’s major life activities.
Service Animal	Service Animal means any dog or, in limited circumstances, miniature horse, that is individually trained to do work or perform tasks for the benefit of and to accommodate the functional needs of an individual with a disability. Other species of animals are not Service Animals. The work or task performed by a Service Animal must be directly related to the individual’s disability and functional limitations.
Owner/Handler	An individual with a disability who owns and utilizes a Service Animal/Assistance Animal for disability related reasons.

Compliance

The University of Southern California permits the presence of trained Service Animals assisting individuals with disabilities on its campus in areas open to the public, consistent with the provisions of this policy and applicable law. A Service Animal is generally permitted to be on university property in any place where the animal’s Owner/Handler is permitted to be, although there are specific locations and activities on university property where all animals are prohibited for health and safety reasons. Such prohibited areas may include but are not limited to the following:

- Research and teaching laboratories
- Other research facilities where the animal may compromise the integrity of research
- Certain clinical/sterile environments
- Certain food preparation areas
- Mechanical rooms/custodial closets
- Areas where protective clothing is necessary
- Areas where there is a danger to the animal
- Exceptions to restricted areas may be granted on a case-by-case basis by the ADA/504 Coordinator, or Disability Services and Programs for students upon consultation with the department/program chair responsible for the restricted area, as appropriate.

A Service Animal must have a harness, leash, or tether unless the Owner’s/Handler’s disability precludes use of tethers, or the tether would interfere with the Service Animal’s ability to safely perform its work or tasks. In these cases, the Service Animal must be under the control of the Owner/Handler (i.e., voice commands, hand signals, or other effective means). Members of the University community and visitors are prohibited from interfering in any way with a Service Animal or the duties it performs.

Assistance Animals are typically restricted to the assigned residence hall and outdoor spaces. Assistance Animals are generally not allowed in other University buildings or in areas deemed a risk or safety hazard. Assistance Animals must have a harness, leash, or tether at all times when not in the assigned residence room.

The University reserves the right to deny access to campus, or remove from campus, any Service Animal or Assistance Animal if –

- The animal is disruptive or out of control and its Owner/Handler does not take action that is effective to control it;
- The animal is not housebroken (i.e., cannot control waste elimination);
- The animal poses a direct threat to the health or safety of others that cannot be eliminated or reduced to an acceptable level by a reasonable modification to other policies or procedures; or
- The Owner/Handler fails to comply with their responsibilities under this policy.

Generally, federal review standards will be utilized for all Assistance Animal accommodation requests for individuals who participate in Residential Education Programs. USC Housing and The Office of Residential Education retain the right to relocate the Owner/Handler and approved Animal as necessary on a case-by-case basis. Should the Animal be removed from the premises for any reason, the Owner/Handler is expected to pay for any associated costs to remove and care for the animal and to fulfill their housing obligation for the remainder of the housing contract.

Other accommodations

If a faculty member, staff member, or student needs any other accommodations, documentation of the disability and a request for accommodations must be made pursuant to the procedures set forth by the Office of Institutional Accessibility’s Interactive Process Center of Expertise or the Office of Student Accessibility Services (OSAS), as applicable.

Violations of Policy

Any violation of the above rules or incidence of other violations may result in immediate removal of the Animal from the University and, if appropriate, referral to the Office of Human Resources or the Office Student Judicial Affairs and Community Standards for disciplinary action. While not a typical scenario, if a Service Animal or Assistance Animal is banned from campus, the individual with a disability will have the right to engage in an interactive process to determine if effective participation can occur with other appropriate accommodations.

Relevant Forms and Tools

Applicable forms are housed in [OSAS](#) and/or [OIA](#).

Contacts

Please direct any questions regarding this procedure to:

OFFICE	PHONE	EMAIL
The Office of Institutional Accessibility and ADA Compliance (OIA)	Not Yet Applicable	mailto:accessibility@usc.edu