

Animals on Campus: A Look at HUD's Advised Process and Student Outcomes (Practice Brief)

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Abstract

This study examined one Midwestern university's emotional support animal (ESA) population and asked the question, "Are ESAs effective in the context of higher education given the academic and social demands of a student?" The number of ESA requests has increased in recent years as more students considered an ESA to help regulate emotions. This study began as a means to review our process and measure student outcomes with data gathered by surveys sent to 122 current and former students with an ESA. The survey utilized a five-point Likert Scale and open-ended questions to gather responses. Twenty-one students started the survey with 18 completing it. The survey was designed with questions that measured participants' academic experience, interpersonal skills, intrapersonal skills, and mental health, in addition to open-ended questions related to these four key areas. The results of the survey were largely positive in the four key areas. This university utilized an ESA request process advised by Housing and Urban Development.

Keywords: emotional support animal, ESA, higher education, mental health, student experience

Emotional support animals (ESAs) are part of a larger category of animals that take on assistive, therapeutic, and emotional support roles. Parenti et al. (2013) identifies several characteristics that distinguish categories of assistance animals. If the animal performs tasks related to an individual's disability, it is a service animal. If the animal is used by public service, military, or healthcare professionals, it is a public service animal. Animals with training certifications or standards, where available, are typically types of therapy animals or visitation animals, while an emotional support animal is more specifically defined as, an animal that provides emotional support that alleviates one or more identified effects of a person's disability (Housing and Urban Development, 2008). Applied to higher education, ESAs are only permitted to occupy residential spaces and cannot enter classrooms and campus facilities unless the handler has specific accommodations. While Title II and Title III of the Americans with Disabilities Act (n.d.) allows service animals to enter all facilities on a campus with their handlers, people who rely on ESAs are not afforded such protections.

In their 2019 article, Chandler references three separate events, each covered by a major news outlet, in which an emotional support animal caused injury to a human or service dog. In one of the cases, a dog that the owner claimed to be an ESA, but later admitted was not, caused an incident with a service dog in an elevator. Chandler used this case to highlight the fact that dogs may bite, especially untrained dogs. In another recent incident, a New Jersey resident's service dog, Beauty, was attacked by two unrestrained dogs in a mall (Deminski, 2020). The owner of the dogs claimed they were ESAs. In their opinion article, Deminski had harsh words for ESA owners who bring their animals into public places. The one point highlighted by this incident is the disservice that occurs to people with disabilities when ESAs are treated as something they are not, and when the owners of ESAs do not comply with laws.

Chandler (2019), who is in favor of ESAs in the owner's residence, highlighted the dubious documentation of "commercial enterprises that take money from the pet's owners" for a worthless registration or certificate. The author notes three questionable

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activities based in the ethics of mental health care. First, the questionable ability to thoroughly assess the actual need for such an animal based on a singular visit. Second, the consideration of a client's ability to determine whether or not an ESA would be detrimental to others or property. Third, the extent to which some mental health care providers supply documentation for individuals with whom they have had little to no contact.

In their 2015 study, VonBergen found that students with disabilities have increasingly petitioned colleges with no-pet policies to permit them to bring their animals to campus. Students in this study were found to have asserted a need for a companion or emotional support animal to make college life easier and to reduce their stress, loneliness, depression, and/or anxiety. With the increase measured by VonBergen, it was likely that more universities would experience growth in ESA requests. A survey of the professional listserv of the Association of Higher Education and Disability (AHEAD) from January 1, 2020 to February 29, 2020 listed twenty individual topics spanning multiple days of discussion of ESAs. This brief survey of topics showed there were still frequent questions relating to documentation and current practices.

The increased interest in ESAs may be due to the role that companion animals can play in supporting people of all ages. Risley-Curtiss (2010) documented the success of the human and companion animal bond with children and adults in feeling a sense of security and unconditional love, contributing to a child's cognitive and language development, and contributing to an elderly person's ability to carry out daily activities. While the human and companion animal bond may create certain favorable mental health outcomes, not all companion animals are necessarily ESAs.

In a synthesis of 17 studies related to benefits of animal ownership, Brooks et al. (2018) found three common themes: emotional work (symptom mitigation), practical work (symptom distraction and physical activity), and biographical work (identity and existential meaning). Qualitative data largely showed animals were able to provide unique support to their owners in all three themes. However, quantitative data were mixed. Quantitative data in emotional work mostly showed neutral or small negative impacts for owners while quantitative data from the studies on practical and biographical work associated with mental health management pointed to the positive impact of dog ownership specifically.

Psychologists, social workers, and veterinarians point to the same literature documenting the often-positive impact of animals on mental health and wellbeing (Fine et al., 2019; Risley-Curtiss, 2010;

Younggren et al., 2016). While support for emotional support animals as a treatment is not in question, research detailing the impact on students and higher education is still limited. This fact is further complicated due to the way certifications are issued and the qualifications and appropriate training regarding recommending or prescribing an animal as a treatment are likely limited.

Clinical psychologists, or treating psychologists, are often called upon to provide administrative services, like emotional support animal evaluations, to their patients given the close nature of the relationship. However, Younggren et al. (2016) highlight this as an ethical concern. Clinical psychologists make treatment plans based solely on the subjective history presented by the patient introducing potential bias and inaccuracy in a diagnosis. The authors argued that forensic psychologists should be the professionals making ESA evaluations and anything else constitutes a role conflict. Boness et al. (2017) consider ESA evaluations a forensic activity that should not be conducted by treating mental health practitioners. However, their survey results demonstrated how treating and forensic practitioners fail to understand that this is a forensic activity, resulting in less than thorough evaluations and major ethical concerns. When considering animal-based treatment interventions in general, Taylor et al. (2016) argue that the ethical legitimacy of animal assisted therapy rests on the willingness to understand animals as sentient beings with needs of their own, not just possessions or tools for humans to use. Whether being used as tools, or conversely being underutilized, Risley-Curtiss (2010) suggests that speciesism plays a significant role and that all stakeholders should be mindful of the place of animals in a treatment capacity.

Despite the recommendation for forensic specialists in evaluating the need for ESAs, social workers are the likely professionals to work with individuals and families with companion animals; thus, the inclusion of such animals in both practice and research as a natural extension of social work with humans, and their challenges, coping mechanisms, and resiliency factors, is valid (Risley-Curtiss, 2010). Risley-Curtiss found that social work practitioners have basic knowledge of the negative and positive relationships between humans and companion animals. Fewer than 25 percent of social workers included companion and other animals in their intervention practices, although the majority have had no special training or coursework to do so. The assumption is that this favorable view extends to recommending ESAs as interventions. Taylor et al. (2016) noted that social work is oriented towards caring for people but does not officially recognize (nonhuman) animals.

Fine et al. (2019) suggested in those situations when a person intends to obtain an animal to be an ESA, a veterinarian should assist with ensuring the animal is suitable for the role and will not experience impaired health or welfare as a result. Currently, no formal federal policies require that a veterinarian evaluate the suitability of an ESA, although airlines may request documentation from a veterinarian regarding the animal's current health status (U.S. Department of Transportation, 2020). Fine et al. (2019) noted when assisting an individual in acquiring an ESA, the veterinarian should have specific knowledge of the species the owner is requesting, because certain species may not be suitable in certain situations or may become distressed in public spaces. Active teamwork between clients, veterinarians, and human health-care professionals could ensure that more benefits are experienced by people and their animals. However, this measure could potentially lead to the problem of creating undue burden if a student must consult with their care provider, a veterinarian, the disability office, and residence life.

Emotional support animal users may just need interaction when experiencing stress, while other users may seek this interaction on a daily basis as a way to enhance their quality of life (Risley-Curtiss, 2010). Historically, emotional support animals were referred to as companion animals. However, the distinction between a companion animal and an emotional support animal is the ability to provide psychological benefits to the owner without formal training to do so.

Depiction of the Problem

Disability Services at the institution in the present study was reviewing its process for determining eligibility for ESAs in campus housing by examining the steps and documentation students must complete for the university's consideration of accommodation. Looking at the office's own history, it was apparent that a steady and significant increase year after year necessitated a review. Through the review of the notable increase in ESA requests and approvals, two main problems, or questions, arose: (a) What are the effects ESAs have on the life of a student on campus?, and (b) How should disability services staff make sense of documentation presented by the student given the vast number of dubious animal certifications (i.e., Who should be considered qualified to complete the verification forms?). Given the legal ambiguity and limitations from Housing and Urban Development (HUD) when they resolve a campus housing complaint, this is more of an ethical or access question, rather than a legal question regarding the request and approval process.

Participant Demographics and Institutional Partners/Resources

The survey was conducted at a large primarily residential Midwestern university. The survey was emailed to 122 current and former students who either in the past or at the time of the survey lived with an ESA in campus housing. Respondents were gathered from an internal system used to track ESA requests and approvals. Data have been kept internally since fall of 2013. Utilizing the information from this list of requests, a provisional respondent list was created. Because tracking has changed slightly since the inception of this list, the list was filtered to remove duplicate names and requests that were left "in process" due to students never submitting all necessary requirements. The filtered list left 122 current and former students.

The students were emailed a Qualtrics link to the anonymous survey that remained open from February 4 to April 1 with a follow up email sent on February 28, 2020. The survey concluded with 18 recorded responses (14.75% response rate). Three additional surveys were started but left incomplete; these were excluded from the results and the response rate.

Description of Practice

Under guidance from the University's Office of the General Counsel and lawyers from Housing and Urban Development, the ESA request process was changed from its prior iteration that relied on more questions and an interactive process with the students to one that could only require some sort of documentation of a disability and two questions answered by a treating professional: (a) Does the individual have a disability?, and (b) Does or would the assistance animal provide some type of disability-related assistance to the individual? While emotional support animals have existed on campus for years prior, the increase in requests and the limiting of the interactive process raised questions regarding ESAs at the University. The process begins with Disability Services and the authorized questions and supporting documentation. Once approved, the student and Housing and Residence Life are notified to sign the housing contract and fulfill the accommodation.

This process revision prompted questions regarding the overall outcomes of students who currently, or previously, received an ESA accommodation. The documentation requirements and process revisions were substantial, but the data gathered from the survey that followed the process change were more enlightening than a simplification of process could have

been. While both were innovative on their own, it was the unity and timing of both the process revision and structured inquiry that created a system for understanding the phenomenon. An overburdened process can restrict access and provide accommodations without follow-up data on the success of students, which would provide no opportunity to understand the impacts on students. These two practices, one that occurred at a single point in time, and the other, an ongoing data collection, will provide meaningful data as Disability Services, Housing, and the University navigate the question of ESAs, moving forward.

The survey measured participants' academic experience, interpersonal skills, intrapersonal skills, and mental health through a five-point Likert scale in addition to open-ended questions. In the latter section participants were asked the following:

- What impact has your ESA had on your overall experience at the University?
- If you registered for an ESA with Disability Services but did not bring the ESA back to campus please explain why.
- Please share how your college experience differed when you had the ESA compared to any time in college you did not have the ESA.

Evaluation of Observed Outcomes

Results from the ESA survey do show an increase in the four key areas: academic experience, interpersonal skills, intrapersonal skills, and mental health. Each of these four areas contained a subset of five criteria being measured. The survey was sent to participants at the beginning of the Spring 2020 semester, prior to the nationwide outbreak of COVID-19. The researchers believe the response rate was limited due to this fact. Additionally, the ESA request and approval numbers were stopped in mid-March due to the campus transitioning to remote learning. The majority of responses expressed a positive subjective outlook on academic integration while a slight percentage expressed a negative impact on social interactions.

For the theme of Academic Experience, the results were largely positive, with only the subset of co-curricular activities and educational activities being slightly negative. "Degree Completion" and "Academic Achievement" were rated highly by participants, both with 77.78% of the subset responses.

Interpersonal Skills were rated favorably in the *somewhat positive* and *extremely positive* categories, but compared to the other skills measured in the survey, interpersonal skills accumulated the most *somewhat negative* and *extremely negative* responses.

While this section held more negative responses there were no cumulative negative response rates higher than 11.11%, or two responses, in the "Belonging on Campus" subset.

Both the Intrapersonal Skills and Mental Health categories received far more responses marked as *extremely positive* and received no responses marked as *somewhat negative* or *extremely negative*. While most results related to the Mental Health category were *extremely positive*, the effect of ESAs on attention span, memory, problem-solving, and decision making was noticeably lower than the other categories measured. This indicated that while there was some improvement, ESAs were less effective in these specific measurements. The largest single response in the survey came from the Mental Health section. The most responses (83.33%) of any question came from the *extremely positive* response measured when asked about the effect of ESAs on developing healthy coping mechanisms.

Intrapersonal Skills questions were designed to evaluate confidence, values and morals, independent thinking, intuition, and level of self-reflection. The largest categorical response rate (77.78%) related to the effect of ESAs on values and morals. The written responses did not explicitly indicate why the values and moral category scored higher than the others, but the responses about caring for an animal could be some indication. This survey was not designed to measure this category explicitly, so no conclusion could be drawn without further research.

Students' written response portion highlighted their ESA experience. The students noted how their ESA helped them to "be more confident and branch out socially," "connect with people socially...she helps me get out and talk to people," and "daily life motivation." One student with self-harm and suicidal ideation found that with therapy and their ESA they have "been able to cope." One student even said, "It made me feel more comfortable with being at the University and being able to call it my home."

Implication and Portability

The results of the students surveyed appear to suggest that the growth and continued access granted by an ESA have some positive impacts on student well-being and degree completion. The approach used by our University in terms of required documentation and who is considered a treating professional appears to be a less heavy-handed approach than some others. This approach seems not to create additional steps in the process which might later be found excessive or restrictive. While the authors think there should be a smooth approval process that requires

documentation, the positive effects of possessing an ESA appear to outweigh the possible downsides of the scant approval process directed by Housing and Urban Development.

Our survey was designed to gain a better understanding of the effect of ESAs while contemplating our own revised approval process. If the results of the survey were merely neutral with no clear benefits or revealed negative effects, then our simple ESA request process would have been called into question for allowing potentially detrimental influences on campus with unnecessary ease. However, our survey showed positive results in all categories. The revised process helped to remove administrative barriers on its own, but in conjunction with the survey, Disability Services was able to gain a better understanding of the positive impact ESAs had on students. The simplified process and the survey demonstrated a practice that has future portability for our office as it will allow us to measure not only the number of individual requests, but also the effectiveness of the accommodation. Students are required to start the process in Disability Services, but once they have been approved, they discuss the ESA and the housing contract with Housing and Residence Life. There are no breed or size restrictions but if there are safety concerns requests can be denied. This is consistent with VonBergen's (2015) research, which showed how animal accommodation requests may be denied if the animal in question poses a direct threat to the health or safety of others, and is one that cannot be reduced or eliminated by other reasonable accommodations. Additionally, institutions should be mindful that extra restrictions (breed, size, weight) and conditions (deposits, pet rent, etc.) cannot be placed on emotional support animals.

While the researchers were not able to analyze meaningful longitudinal data for retention and graduation for students with ESAs in this survey, it provided Disability Services with meaningful data on the student experience, retention considerations related to emotional support animals, and a more specific measurement than an annual disability climate survey. Implementing this practice in conjunction with a revision of the ESA accommodation process has created a system of greater understanding of the impacts animals play in the emotional wellbeing and success of students. Both the revised process and the survey created a new perspective when viewing the rise of ESA requests. The student responses indicated there was a positive effect on mental health, academic achievement, and progress towards degree completion. While ESAs follow a different approval process than test accommodations and even single room requests, the student responses show they have been integral to meaningful college progress.

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