

Service Animals Guidelines

At Cambridge Health Alliance, we are committed to ensuring that individuals who use service animals have full access to our healthcare services. In line with the Americans with Disabilities Act (ADA), service animals are defined as dogs specifically trained to perform tasks that assist individuals with disabilities—such as guiding those with vision impairments, alerting those with hearing loss, or helping manage physical, psychiatric, or neurological conditions. Service animals are welcome on our property and may accompany their handler in most areas, regardless of whether the animal has been officially licensed or certified.

Personnel

This policy pertains to all employees of the Cambridge Health Alliance, including students, residents, fellows, trainees, and temporary employees. It also applies to non-employed Cambridge Health Alliance Medical and Allied Health Professional Staff, contracted workers and volunteers.

Definitions

- A. **Disability:** A person must meet the statutory definition of having a “disability,” under federal, state and local fair housing laws. These statutes recognize the following broad categories of disabilities:
- A sensory, mental, or physical impairment that substantially limits one or more major life activities (such as walking, seeing, hearing, speaking and breathing, working, learning, caring for one’s self, performing manual tasks, etc.)
 - A sensory, mental or physical condition that is medically cognizable or diagnosable.
- B. **Partner/Handler:** A person with a service or therapy animal. A person with a disability is called a partner whereas a person without a disability is called a handler.
- C. **Pet:** A domestic animal kept for pleasure or companionship. Pets are not permitted at Cambridge Health Alliance. Permission may be granted by Administration for a pet to be in a CHA facility for a specific reason at a specific time.
- D. **Service Animal:** Any dog individually trained to do work or perform tasks directly related to the disability that the person has. If there is a question about whether an animal is a service animal, Contact the CHA Safety Officer. A service animal is sometimes called an assistance animal.

- E. **Therapy Animal:** An animal with good temperament and disposition, and who has reliable, predictable behavior, selected to visit people with disabilities or people who are experiencing the frailties of aging as a therapy tool. The animal may be incorporated as an integral part of a Treatment process. A therapy animal does not assist an individual with a disability in the activities of daily living. The therapy animal does not accompany a person with a disability all the time, unlike a service animal that is always with its partner. Thus, a therapy animal is not covered by Laws protecting service animals. See CHA's Animal Assisted Therapy Policy C-INC-0030 (<http://staffnet/Reference/Policies/InfectionControl/C-INC-0030.pdf>)

Types of Service Animals

- A. A guide animal is trained to serve as a travel tool by a person who is legally blind.
- B. A hearing animal is trained to alert a person with significant hearing loss or who is deaf when a sound occurs, such as a knock on the door.
- C. A service animal is trained to assist a person who has a mobility or health disability. Duties may include carry, fetching, opening doors, ringing doorbells, activating elevator buttons, steadying a person while walking, helping a person up after a fall, etc. Service animals sometimes are called assistance animals.
- D. A seizure response animal is trained to assist a person with a seizure disorder. The animal's service depends on the person's needs. The animal may go for help, or may stand guard over the person during a seizure. Some animals have learned to predict a seizure and warn the person.
- E. A companion animal or emotional support animals assist persons with psychological disabilities. Emotional support animals can help alleviate symptoms such as depression, anxiety, stress and difficulties regarding social interactions, allowing tenants to live independently and fully use and enjoy their living environment. A companion animal does not assist an individual with a disability in activities of daily living. The companion animal does not accompany a person with a disability all the time, unlike a service animal that is always with its partner. **Thus, a companion animal is not covered by laws protecting service animals.**

Procedures

Requirements for Staff:

- A. **Must not inquire about the nature of the person's disability but must ask if an animal is required because of a disability and what work the animal has been trained to perform, unless it is readily apparent that an animal is trained to do work or perform tasks for the individual with a disability.**
- B. Allow a service animal to accompany the partner at all times and everywhere on CHA property, except where service animals are specifically prohibited.

- C. Do not pet a service animal; petting a service animal when the animal is working distracts the animal from the task at hand.
- D. Do not feed or clean up after a service animal. The service animal may have specific dietary requirements. Unusual food or food at an unexpected time may cause the animal to become ill.
- E. CHA staff are not to walk or feed or otherwise contribute to the care of the animal.
- F. Do not deliberately startle a service animal.
- G. Do not separate or attempt to separate a partner/handler from his or her service animal.

Requirements of Service Animals and Their Partners/Handlers:

- A. **Vaccination:** The animal must be immunized against diseases common to that type of animal. Dogs must have had the general maintenance vaccine series, including vaccinations against rabies, distemper, and parvovirus. All vaccinations must be current. Dogs must wear a rabies vaccination tag.
- B. **Licensing:** The animal must comply with local licensing requirements.
- C. **Leash:** The animal must be on a leash, harness, or tether at all times, unless either the handler is unable because of a disability to use a harness, leash or other tether; or the use of a harness, leash or tether would interfere with the service animal's safe, effective performance of work, work or task in which case the service animal must be otherwise under the handler's control using voice controls, signals, or other effective means.
- D. **Under Control of Partner/Handler:** The partner/handler must be in full control of the animal at all times. The care and supervision of a service animal is solely the responsibility of its partner/handler. If a service animal must be separated from the handler to avoid a fundamental alteration or a threat to safety, it is the responsibility of the partner/handler to arrange for the care and supervision of the animal during the period of separation.
- E. **Cleanup Rule:** The partner/handler must always carry supplies sufficient to clean up the animal's feces whenever the animal and partner are on CHA property. The partner/handler is responsible for toileting the animal. As a courtesy to patients, visitors, and staff, the service animal will be taken outdoors for toileting by the partner or designated friend or family member, and all solid waste will be picked up by the handler/partner in a plastic bag and disposed of in outdoor trash bins.
- F. **Feeding and Other Care:** Provides the service animal with food, water, and other necessary care or makes arrangements through others (excluding staff) to do the same.

- G. **In Massachusetts** a service animal must be a dog that is at least 1 year of age to support the handlers' needs.
- H. **Training:** Inquire from the handler if the dog was trained at a specific school. If so, ask what school it was from and consider reaching out to the school to see if any groups are able to house the animal while the patient is in the hospital. Sometimes the animal may have Guide Dog contact information on its collar.

When a Service Animal Can Be Asked to Leave:

- A. **Disruption:** The handler/partner of an animal that is unruly or disruptive (e.g., barking, running around, bringing attention to itself) may be asked to remove the animal from a CHA building. If the improper behavior happens repeatedly, the partner may be told not to bring the animal into any CHA facility until the partner takes significant steps to mitigate the behavior. Mitigation can include muzzling a barking animal or refresher training for both the animal and the partner.
- B. **Poor Behavior:** A service animal may be excluded from a CHA building when the animal's behavior poses a direct threat to the health and safety of others. For example, any service animal that displays vicious behavior towards other patients or visitors may be excluded. A service animal may also be excluded from certain areas due to concerns for health and safety.
- C. **Ill Health:** Service animals that are ill should not be taken into public areas. A partner with an ill animal may be asked to leave the animal at home during their hospital stay.
- D. **Uncleanliness:** Partners with animals that are unclean, noisome and/or bedraggled may be asked to leave a CHA facility. An animal that becomes wet from walking in the rain or mud or being splashed on by a passing automobile, but is otherwise clean, should be considered a clean animal. Animals that shed in the spring sometimes look bedraggled. If the animal in question usually is well groomed, consider the animal tidy even though its spring coat is uneven and messy-appearing or it has become wet from weather or weather-related incidents.

Areas of Off Limits to Service Animals:

A service animal is permitted in areas of the Cambridge Health Alliance that are unrestricted to inpatients, outpatients, or visitors provided the presence of the animal does not pose a direct threat; resulting in the fundamental alteration of the goods, services, facilities, privileges, or accommodations of the Cambridge Health Alliance; or jeopardizing the safe operations of the CHA facility; and subject to the following:

A. Inpatient Areas:

- **Restricted Areas:** Areas where a service animal generally cannot be permitted to access include limited-access areas that employ greater than general infection-control measures and patient units where a patient is immunosuppressed or in isolation.

These areas include but are not limited to operating rooms, post anesthesia recovery unit, respirator isolations for tuberculosis, and all other areas where invasive procedures occur.

- **Inpatient Rooms:** A service animal is generally permitted in inpatient areas unless an individualized assessment is made to exclude a service animal. This assessment shall be based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence to ascertain: the nature, duration and severity of the risk; the probability that a potential injury will actually occur; and whether any reasonable modification of policies, practices or procedures or the provision of auxiliary aids or services will mitigate the risk. If a determination is made that a service animal cannot remain in the room assigned to the patient, the patient will be offered the option of being placed in another comparable room, if available.

B. Outpatients

- A service animal is generally permitted in outpatient areas unless an individualized assessment is made to exclude a service animal. This assessment shall be based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence to ascertain; the nature, duration and severity of the risk; the probability that a potential injury will actually occur; and whether any reasonable modifications of policies, practices or procedures or the provision of auxiliary aids or services will mitigate the risk. If a determination is made that a service animal cannot remain in the outpatient area, the patient will be offered the option of removing the animal or having family, friends or other accompanying persons remove the animal so the patient may continue their visit.

C. Visitors

- Inpatient areas where a service animal generally cannot be permitted to access include limited access areas that employ greater than general infection-control measures and areas where a patient is immunosuppressed or in isolation. Service animals are generally permitted in inpatient rooms in accordance with CHA policy for all visitors, including but not limited to ICU visitation rules for the number of visitors and duration of the visit. If the visitor is not permitted to bring the service animal into a particular area then Cambridge Health Alliance shall offer the visitor and the patient an accommodation including but not limited to transferring the patient to another comparable room where unrestricted visits could occur, or allowing the visit to occur in a different area that affords equivalent privacy and amenities.

- Service animals are generally permitted where visitors are permitted in outpatient areas, unless an individualized assessment is made to exclude a service animal. This assessment shall be based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence to ascertain: the nature, duration and severity of the risk; the probability that a potential injury will actually occur; and whether any reasonable modifications of policies, practices or procedures or the provision of auxiliary aids or services will mitigate the risk. If a determination is made that a service animal cannot remain in an outpatient area, the visitor will be offered the option of removing the animal or have a friend, family or accompanying person remove the animal so the visitor may continue with the visit.
- Visits with service animals: In the event a service animal is not permitted in an inpatient room, CHA staff shall, upon a patient's request, arrange for visits between a service animal and its handler or a visitor who uses a service animal in an area of equivalent privacy and amenities.

D. Allergies/Phobia:

- In the event that a patient or a CHA staff member is allergic to or has a phobia about animal, CHA shall further modify its policies, practices and procedures to permit a service animal to remain with a patient in an inpatient room by, for example, moving the patient to another comparable room, changing staff schedules, or using other nondiscriminatory methods so that the presence of the service animal would not pose a direct threat and would not require fundamental alteration in CHA's policies, practices or procedures. Any patient or staff member with an allergy to animals shall provide verification within a reasonable timeframe of request.

Rapid Response or Emergency/Code Blue Situations:

In the event of an emergency, CHA's response team that responds should be trained to recognize service animals and to be aware that the animal may be trying to communicate the need for help. The animal may become disoriented from the smell of smoke in a fire or laboratory emergency, from sirens or wind noise, or from shaking and moving ground. The partner and/or animal may be confused from the stressful situation. CHA staff should be aware that the animal is trying to be protective and, in its confusion, is not to be considered harmful. The ERT will make every effort to keep the animal with its partner. However, the ERT's first effort is toward the partner; this may necessitate leaving an animal behind in certain situations.

Complaints:

- A. All complaints should be directed to the CHA Safety Officer who also serves as the ADA Coordinator. The CHA Safety Officer will work with Risk Management to find a suitable solution.
- B. All complaints will be investigated to determine validity. The person making the complaint has the right to representation by another person. All interested parties and their representatives shall have an opportunity to submit relevant information to the complaint.
- C. Resolution of the complaint will be accomplished as expeditiously as possible and the following should be considered:
- Range of available accommodations;
 - The net cost of the accommodation, including the overall financial resources compared to the size of the facility;
 - Nature and extent of the accommodation;
 - Impact or accommodation upon the operation of the facility; and/or
 - No adverse outcome in patient care.

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