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Office of the President PPM-007-2019T (SOM) DEC 2 6 2019

SUBJECT: Animal-Assisted Interventions

A. <u>**Purpose</u>**. This Uniformed Services University of the Health Sciences (USU) President's Policy Memorandum (PPM) provides guidance on animal-assisted interventions: the utilization of various species of animals in diverse manners beneficial to humans. This includes, but is not limited to, animal-assisted therapy, education, and activities.</u>

B. References. See Enclosure 1.

C. <u>Applicability</u>. The provisions of this PPM apply to all USU departments and activities. The use of service animals, and military working dogs, are not considered animal-assisted interventions and are not covered by this PPM. Nor does this PPM address the use of animals in research.

D. Policy. It is USU policy that Animal-Assisted Interventions (AAI) should:

1. Provide an efficient and effective means to enhance quality of life;

2. Be governed by standards, regularly monitored, and staffed by appropriately trained personnel;

3. Adhere to best practices and have goals with measurable outcomes; and

4. Ensure the health and welfare of the humans and animals involved;

5. Note: Personal pets that are not service animals are not allowed at USU unless part of an approved AAI.

E. Definitions. See Enclosure 2.

F. Responsibility.

- 1. The President, USU shall:
 - a. Determine whether to approve AAI.

b. Ensure there are proper processes and procedures in place to allow for appropriately trained and certified dogs to be permitted on the USU campus.

- c. Ensure the health and safety of students, staff, visiting dogs, and dog handlers.
- d. Grant exceptions to this policy, as needed.
- 2. The Associate Dean for Student Affairs, SOM shall:
 - a. Provide day-to-day direction for this policy.
- 3. The USU Facility Dog Program Coordinator shall:
 - a. Oversee and manage the USU Facility Dog Program.

b. Coordinate Animal Assisted Activity (AAA) visits to USU by the American Red Cross and the Walter Reed Facility Dog Program.

c. Ensure dogs in this program are used only for AAA.

d. Ensure that only appropriately qualified individuals handle the USU Facility Dogs. To include providing USU Facility Dog Handler Appointment Letters.

e. Ensure that only appropriately qualified and certified dogs provide services as part of the USU Facility Dog Program.

f. Engage in proper hand hygiene whenever around any dog on USU.

g. Complete requisite paperwork and notify individuals should a student, visitor, faculty or staff member be bitten or injured by any dog on the USU campus.

h. Ensure that AAA Handlers enter confined workplaces at USU with facility animals only at the request of the Office Supervisor using the process found at *Enclosure 3, Attachment 1*. This affirmative "opt-in" requirement for each visit is designed to ensure that personnel in the workplace do not have medical conditions (e.g., allergies or phobia) and objection that may be adversely impacted by the presence of facility animals and/or object to the presence of facility animals in their workplace. It also ensures that facility animal visits do not interfere with operational requirements of the office involved.

4. AAA Handler- including as part of the American Red Cross Program shall:

a. Ensure completion of all required training for themselves and their animals. USU Handlers must complete a USU Facility Dog Handler Application, (See Enclosure 3, Attachment 2). USU Facility Dog Handler Training, and receive a USU Facility Dog Appointment Letter, (See Enclosure 3, Attachment 3).

b. Ensure maintenance of required health standards for their dogs.

c. Provide written proof that the dog(s) they are handling is/are covered with liability insurance. Handlers may be responsible in a court of competent jurisdiction for misconduct by either themselves or their dogs that results in illness or injury to patients, visitors, faculty/ staff members, or other dogs. To the extent permitted by law, handlers will maintain responsibility and liability for any damages or injuries caused by their animals unless said handler is acting within the scope of the USU AAI. America Red Cross (ARC) Handlers must also provide ARC any changes to the insurance coverage.

d. Provide certification that each dog is free from disease and internal/external parasites.

e. Ensure that they, and the dog, are feeling well for a full 24 hours before visiting USU.

f. Clean up and remove any animal waste.

g. Ensure that the AAA dog remains in control and is housebroken.

h. Engage in proper hand hygiene.

i. Any government employee must obtain supervisory permission and properly account for the time that she/he is away from primary duties to serve as a handler.

j. Follow the provisions in this Instruction concerning the handling of any AAA dog.

k. Comply with specific requirements of the program to which they belong.

1. Be required to report through Civilian Human Resources as a USU volunteer (*Reference k*) if they are non-USU affiliated, non-Walter Reed and non-Red Cross affiliated.

m. Before entering any office workspace, ensure that the Office Supervisor made a prior request for an AAA visit for that day IAW *Enclosure 3, Attachment 1.*

n. Ensure proper communication when approaching individuals, especially when said individuals are in confined spaces, regarding their receptivity to being approached by a dog. Proper communication techniques will be taught during the USU Facility Dog Handler Training.

5. USU Office Supervisors:

a. Office supervisors may request a facility animal visit to a confined workplace within the supervisor's responsibility only after ensuring that no person in the affected workplace has indicated the presence of a medical condition (*e.g.*, allergies or phobia) that may be adversely impacted by a facility animal visit and/ or object to the presence of facility animals in their work place. Visit requests will follow the process found at (*Enclosure 3, Attachment 1*). 6. Director, Civilian Human Resources:

a. Process volunteer AAA Dog Handlers who are non-USU affiliated, non-Walter Reed and non-Red Cross affiliated.

b. Maintain records of any collateral duty assignments of USU employees as AAA Dog-Handlers.

7. USU Brigade Commander:

a. Maintain records of any collateral duty assignments of USU military personnel as AAA Dog Handlers.

8. USU Security:

a. Respond to reports of unsafe AAA animals, and ensure that such animals are removed from USU premises by the owner IAW *Enclosure 3*, Paras 1.f&g.

G. Procedures. See Enclosure 3.

H. Effective Date. This PPM is effective immediately.

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Richard Thomas, MD, DDS, FACS President

Enclosures:

- 1. References
- 2. Definitions.
- 3. Procedures
- 4. Glossary

REFERENCES

- (a) NSABETHINST 10570.1C, "Animals Onboard Naval Support Activity Bethesda," dated November 28, 2017.
- (b) Technical Med 4, "DoD Human-Animal Bond Principles and Guidelines," dated August 3, 2015.
- (c) Title 28, Code of Federal Regulations (CFR).
- (d) Title 38, CFR.
- (e) WRNMMC Red Cross Program for Assistance Dogs and Animal Visitation Program. Handbook.
- (f) "Memorandum of Understanding between the Department of Justice and the Department of Defense: Status of Certain American Red Cross Volunteers," retrieved from http://www.militaryonesource.mil/12038/MOS/MWR/PR000613-09REDXMOU.pdf
- (g) Title 40, United States Code.
- (h) Title 42 United States Code §§ 12101 et seq.
- (i) DoD Instruction 1000.15, "Procedures and Support for Non-Federal Entities Authorized to Operate on DoD Installations," dated October 24, 2008.
- (j) DoD Instruction 1300.27, "Guidance on the Use of Service Dogs by Service Members," dated January 7, 2016.
- (k) Uniformed Services University HR Volunteer package.
- (1) "WRNMMC Administrative Instruction 3000.07," dated May 2019.

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DEFINITIONS

1. <u>Animal Assisted Activity (AAA)</u>. An activity that provides animal interaction to enhance quality of life. This is not tailored to a particular person or medical condition. Consistent with section 1.218 of *(Reference d)*, AAA involves dogs in activities to provide individuals with casual opportunities for motivational, educational, recreational, and/or therapeutic benefits. It is not a goal-directed clinical intervention that must be provided or facilitated by a therapist or clinician, and it is not necessarily incorporated into the treatment regimen of a patient or documented in the patient's medical record as treatment.

2. <u>Animal Assisted Interventions (AAI)</u>. Consistent with Technical Med 4, DoD Human-Animal Bond Principles and Guidelines, (*Reference b*), AAI is a broad term that includes what is known as "Animal Assisted Therapy" and "Animal Assisted Activities". It is typically a goal oriented and structured intervention that intentionally includes or incorporates animals in health, education and human service (e.g., social work) for the purpose of therapeutic gains and improved health and wellness.

3. <u>Animal Assisted Therapy (AAT)</u>. Consistent with section 1.218 of (*Reference d*), AAT is a goal-directed clinical intervention, as provided or facilitated by a therapist or clinician, that incorporates the use of a dog into the treatment regimen to improve physical, social, emotional, and cognitive function. The intervention goals are designed, documented, and tracked by a human health care professional for each patient. They must facilitate achievement of patient-specific treatment goals, as documented in the patient's treatment plan.

4. <u>Disability</u>. Consistent with paragraph 1.218 of (*Reference d*), a disability means, with respect to an individual, a physical or mental impairment that substantially limits one or more major life activities of the individual; a record of such an impairment; and/or being regarded as having such an impairment.

5. DoD Installation. Defined in DoDI 1000.15 (Reference i).

6. <u>Handler</u>. A handler is an individual who has received respective training (USU Facility Dog Handler Training in the case of USU Handler) and who works in collaboration with a specially trained dog.

7. <u>Other Animals</u>. All domestic or wild animals that are not service dogs AAT, AAA, facility dogs, or military working dogs, which includes pets, therapy, companion, and emotional support animals.

8. <u>Office Supervisor</u>. The civilian management official, commander or Service member with responsibility for directing, supervising and/or managing those working in a confined workplace.

9. <u>Personal Pet</u>. Any animal owned by an individual not meeting the definition of AAA animal, AAT animal, or service animal. Personal pets may provide companionship and emotional support, but are not allowed at USU, unless part of the facility dog program.

10. Service Dog.

a. For recovering Service members, per *Reference j*, "A dog obtained from an accredited service dog organization approved by the Department of Veterans Affairs that is individually trained to do work or perform tasks for the benefit of an individual with a physical or mental disability. The dog is trained to respond to a verbal command or condition of the qualified Service member. Other species of animals, whether wild or domestic, trained or untrained, are not service dogs for the purposes of this definition. Dogs that are "in training" or whose sole function is to provide emotional support, comfort, therapy, or companionship are not service dogs."

b. For non-recovering Service members, per section 35.104 of (*Reference c*), "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. 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 the individual's disability."

PROCEDURES

1. AAA Dogs

a. Per *Reference a*, NSAB retains authority over installation access, control, and domiciling for dogs participating in AAA. Dogs participating in AAA at USU will only be as part of a USU President or President's designee approved program. The USU President retains the right to refuse or limit any such program. At USU, dogs who participate in AAA do so IAW the Walter Reed Facility Dog Program (*Reference 1*), Walter Reed National Military Medical Center (WRNMMC) ARC Assistance Dogs and Animal Visitation Program (*Reference e*), or through the USU Facility Dog Program. The WRNMMC ARC Station Manager or ARC Animal Visitation Coordinator maintains records on the ARC dogs. The USU Facility Dog Manager maintains records on the Dogs within the USU Facility Dog Program. Individuals wishing to bring a dog into USU to engage in AAA will need to speak with the WRNMMC ARC Station Manager and ARC Animal Visitation Program Coordinator. USU is the approval authority for the use of facility dogs at USU and the addition of any other dogs to the USU Facility Dog Program or AAA.

b. Dogs participating in the USU Facility Dog Program must be purpose bred by an Assistance Dog International accredited service dog training program prior to being "Changed to Facility Dogs."

c. The goal of a visit by a dog participating in AAA is to enhance quality of life through direct contact and social interaction. AAA interventions are not necessarily tailored to individual needs or conditions.

d. Consistent with section 1.218 of (*Reference d*), dogs participating in AAA may be permitted to be present at USU and at ceremonial events.

e. Owners/handlers will not leave dogs who are participating in AAA unattended or off leash in any USU facility. Exceptions to this are when being off leash is essential to the performance of the desired AAA. Such exceptions may only apply to USU Facility Dogs and not ARC dogs, and is only permitted within a USU building and enclosed space. Further, the AAA dog must be under the handler's complete control through voice, signals, or other effective means.

f. While inside any USU facility, dogs participating in AAA must be held on a leash with six feet maximum length but held close to the handler as not to impede movement by other individuals and under the direct control of the owner/handler at all times. Anyone has authority to require an owner/handler to remove a misbehaving AAA dog (barking, growling, lunging, begging for food, uncontrollable by the handler, etc.) from the local area. If necessary, personnel should contact USU Security or NSAB Security for support in this matter.

g. If, at any time, anyone observes a dog who is participating in AAA to appear sick, infected or demonstrate a change in temperament, that individual should contact USU Security,

who will assist in the matter (i.e., informing the owner/handler that the dog must be removed from the premises).

h. AAA visits to confined workplaces may only be made at the request of an Office Supervisor who has ensured that no person in the affected workplace has indicated the presence of a medical condition (e.g. allergies or phobia) that may be adversely impacted by a facility animal visit.

i. Handlers must ensure proper communication when approaching individuals, especially when said individuals are in confined spaces, regarding their receptivity to being approached by a dog. Proper communication techniques will be taught during the USU Facility Dog Handler Training.

j. Dogs participating in AAA must be housebroken and must be trained to eliminate its waste in an outdoor, grass surface area. The handler/owner of such a dog is responsible for proper disposal of all of the animal's waste in a trash receptacle outside the facility.

k. Health and temperament requirements for dogs participating in AAA.

1) All dogs participating in AAA at USU must have a trained primary owner/handler, see *Enclosure 3 Attachments 2 & 3* for documents for authorized and approved USU Facility Dog Handlers. USU Facility Dog Handlers must complete Facility Dog Handler Training, and they are assigned their activities by the USU Facility Dog Program Coordinator. Personnel from other commands are welcome to participate as USU Facility Dog Handlers in the USU Facility Dog Program subject to review and approval by the USU Facility Dog Program Coordinator, and their command. The AAA dog's owner/handler must maintain and provide documentation of the dog's temperament, health, and welfare standards to the WRNMMC Red Cross or USU Facility Dog Program Coordinator. The ARC Dog Coordinator, for the ARC AAA dogs, and the USU Facility Dog Manager, for the USU Facility dogs, will maintain a copy of these records. Should the coordinator have questions about any of the required paperwork that is presented, the coordinator should call a military veterinarian and the dogs will not participate in any AAA activity until the issue is resolved.

2) Dogs participating in AAA must also receive yearly physical health examinations. Their skin should be free from fleas, ticks, lice, mites, and dermatitis. Teeth and gums should be clean and healthy.

3) The owner/handler must provide verification that immunizations are current. These include the rabies vaccine and distemper combination vaccine. (The leptosprosis vaccine and Bordetella vaccine are recommended non-core vaccinations.) For dogs that cannot receive rabies and distemper combination vaccines due to health concerns (such as an adverse reaction or auto-immune disease), the owner must provide current evidence that a blood titer has been performed to verity that the dog has sufficient antibody present and are "immune."

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4) Fecal examination must be performed to demonstrate that the AAA dog is free from intestinal parasites. There should be negative fecal flotation and negative heartworm tests done within one year.

5) All AAA dogs must be actively treated with a monthly veterinarian-approved flea and tick preventative and a veterinarian-approved heartworm and intestinal parasite preventative. Owners/handlers should be prepared to provide evidence that the treatment is current.

6) Raw food diets are discouraged, given their potential of transmitting illnesses from dogs to people.

1. Infection Control considerations. All dogs can transmit infectious diseases to humans, and likewise, humans can transmit infectious diseases to dogs. Dogs can become transient vectors or carriers of potential human pathogens and could be responsible for cross-infection. Proper infection procedures are warranted at all times to minimize the risk of transmission between humans and dogs.

1) Any area contaminated by dog urine, feces, emesis, or blood, must be cleaned using appropriate personal protective equipment (gloves) and a disinfectant, and housekeeping may be contacted to assist.

2) Scrupulous hand hygiene by staff should take place before and after contact with the AAA dogs.

3) AAA dogs should appear healthy, clean, well-groomed, and be odor free before visiting.

m. When deemed appropriate by the USU Facility Dog Program Coordinator and in consultation with the individual USU Facility Dog owner and organization of origination, and approved by the Chief of Staff, a USU Facility Dog will be considered for, or retirement from, service to the program and remain the property of the USU Facility Dog owner according to the agreement as established with the donating organization.

n. Photographs with any dogs participating in AAA will be consistent with USU's photography policy. This will entail getting permission from persons whose image is in the photograph.

REQUESTING A USU FACILITY DOG AT A WORKPLACE OR AN EVENT/ACTIVITY

1. The USU Facility Dog(s) may be requested to visit a USU workplace or to participate in various events and activities. Requests for visits to confined workplaces must be submitted to the USU Facility Dog Program Coordinator via email.

- a. All event/activity requests must include:
 - 1) Name of event or activity
 - 2) Date of event or activity
 - 3) Time of event or activity and desired duration of attendance by the Facility Dog
 - 4) General purpose of the event or activity
 - 5) Point of contact: name, email and phone number for event or activity
- b. All requests for AAA Visits to confined workplaces must include:
 - 1) Name of Office Supervisor making request.
 - 2) Requested timeframe for the AAA visit.

3) Statement that the Office Supervisor has ensured that no person in the workplace during the timeframe for the requested visit indicated the presence of medical conditions (e.g. allergies or phobia) and objection that may be adversely impacted by the presence of the facility animals and/ or object to the presence of facility animals in their workplace.

USU FACILITY DOG HANDLER APPLICATION

Applicant Name:
Rank/Rate:
Department/Service:
Email Contact Information:
Work Telephone Contact Information:
Cellular Telephone Contact Information:
Availability:
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I verify that this applicant is available to support the USU Facility Dog Program as a collateral duty and has permission to participate in the program.

Signature (USU Dept. Head or higher/ CO or designee for non-USU commands)	Date	Printed Name	
USU Facility Dog Program Coordinator	Date	Printed Name	

The training coordinator is the USU Facility Dog Program Coordinator, who is the person responsible for the day to day coordination of the USU Facility Dog Handlers. Once completed, the form will be maintained in the USU Facility Dogs Program files.

USU FACILITY DOG HANDLER SAMPLE APPOINTMENT LETTER

Date:

From: USU Facility Dog Program Coordinator To: (Applicant)

Subj: APPOINTMENT AS USU FACILITY DOG HANDLER

1. Effective immediately, you are hereby appointed as a USU Facility Dog Handler.

2. This appointment is to be considered as a collateral duty and is not to interfere with your primary duties as assigned.

3. You will be governed in your collateral duty as a USU Facility Dog Handler by USU-PPMxxx-2019.

4. This appointment remains in effect for the period of time that you are attached/assigned/employed to Uniformed Services University, unless otherwise revoked.

USU Facility Dog Program Coordinator

Date

Printed Name

Enclosure 4

Glossary

ABBREVIATIONS AND ACRONYMS

- 1. AAA Animal Assisted Activity
- 2. AAI Animal Assisted Interventions
- 3. AAT Animal Assisted Therapy
- 4. ADA Americans with Disabilities Act
- 5. AI Administrative Instruction
- 6. ARC American Red Cross
- 7. DOD Department of Defense
- 8. IAW In Accordance With
- 9. NSAB Naval Support Activity Bethesda
- 10. WRNMMC Walter Reed National Military Medical Center