Report: North American Airline Access for Assistance Dog Teams Meeting with US Government Officials.pdf

FROM: Assistance Dogs International, North America

TO: U.S. Elected Officials

RE: Traveling by Air with Service Animals

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FROM: Assistance Dogs International, North America

TO: U.S. Elected Officials

RE: Traveling by Air with Service Animals

Assistance Dogs International

Assistance Dogs International (ADI) is a worldwide coalition of non-profit programs that train and place Assistance Dogs. Founded in 1986, ADI is the leading

authority in the Assistance Dog industry.

The objectives of ADI are to:

list of 4 items

• Establish and promote standards of excellence in all areas of assistance dog acquisition, training and partnership

• Facilitate communication and learning among member programs

• Educate the public to the benefits of

Assistance Dogs and ADI membership.

list end

President George H.W. Bush and his Service Dog Sully with President Bill Clinton America’s Vet Dogs, St. Smithtown, NY

ADI organizations that pass ADI’s accreditation process become ADI Accredited Member programs. They are regularly assessed to ensure they meet the highest

standards in the industry.

Terminology: Assistance Dog = Service Dog

The training industry defines Assistance Dogs the same way that the Americans

with Disabilities Act (ADA) defines Service Dogs – as dogs specially trained to perform

a task or tasks to mitigate an individual’s disability. ADI organizations are required to

also train their dogs in public behavior in places such as restaurants, stores, trains and

airplanes.

ADI North America

ADI North America (ADI, NA) consists of 73 Assistance Dog training organizations:

United States – 65

Canada – 8

ADI, NA Service Dogs teams currently active in North America – 17,504

ADI, NA member clients comprise the majority of individuals using service dogs including those using air carriers. ADI, NA appreciates this opportunity

to share its expertise regulations pertaining to air travel by animals in the airplane cabin.

Amending the Air Carrier Access Act (ACAA)

Hearing Dog team, Megan and Sherlock

Service Dogs, Inc., Dripping Springs, TX

ADI, NA agrees with the transportation industry and individuals with disabilities contacting Department of Transportation (DOT) that the Air Carrier Access

Act (ACAA) regulation on the transportation of service animals should be amended to:

list of 3 items

• Ensure nondiscriminatory access for individuals with disabilities,

• Prevent instances of fraud

• Ensure consistency with other Federal regulations, specifically, the Americans With Disabilities Act.

list end

ADI, NA agrees with the DOT of the importance of:

list of 3 items

• Ensuring individuals with disabilities can continue using their service animals

• Deterring the fraudulent use of other animals not qualified as service animals

• Not accepting animals not trained to behave properly in public for transport as service animals.

list end

Emotional Support Animals (ESAs)

ADI, NA agrees with the airlines in opposing recognition of Emotional Support Animals (ESAs) in the ACAA context because ESAs are not required to have

training of any kind. Specifically, ESAs do not have training in public behavior. Because of this:

list of 2 items

• ESAs pose a potential threat of disruption or harm to passengers, crew and legitimate service animals

• ESAs can suffer stress from being in the

environment of air travel stemming from:

list of 3 items nesting level 1

o Exposure to crowds at airports

o Confinement to a carrier for an extended period of time

o Changes in air pressure, altitude, vibrations and noise associated with air travel

list end nesting level 1

list end

Service Dogs remain calm in proximity to strangers and in a variety of situations. Savannah/Hilton Head International Airport

Palmetto Animal Assisted Life Services (PAALS), Columbia, SC

ADI, NA agrees with the proposal of air carriers of eliminating access for ESAs.

ADI, NA agrees with airlines and flight attendants that should ESAs continue to have cabin access, ESA species should be limited to dogs and cats because

it is difficult to enforce a rule that ESAs be allowed to be outside of their carriers when providing disability mitigation because that would require

a subjective assessment by flight attendants.

ADI, NA feels that should ESAs continue to have access, that they should be required to fit into pet carriers and remain contained inside of them for the

duration of the flight.

Service Animals – Species Limitation to Dogs

ADI, NA agrees with airline representatives and the disability organizations cited in the DOT’s Docket No. DOT-OST-2018-0068, RIN No. 2105-AE63 that coverage

of service animals should be limited to dogs.

Number of Service Animals Per Passenger - Limit to 1 (One)

ADI, NA feels that passengers should be limited to one (1) service animal on an air carrier. In the Assistance Dog industry, training organizations provide

only a single service dog for a client. When an individual has multiple disabilities, agencies will train a single service dog as a “dual purpose” dog.

The dual purpose dog, for example, might work for an individual who is blind and also uses a wheelchair, both guiding the person and retrieving objects.

Or a deaf person who also has seizures would use a dual purpose dog that alerts her to sounds, such as the door knock and telephone and also alerts her

to seizures so she can gather herself, sit down and hug a pillow or take other helpful action to prepare for the seizure. The Assistance Dog industry trains

only one dog per client, preferring to train that dog to mitigate the client’s disabilities instead of expecting a client to be able to care for and keep

two dogs under control. At times, when a dog is retiring or near the end of its life, an agency may place the successor service dog with the client; however,

the overlap would be in the home only. The agency would instruct the client to only take the successor service dog out into public.

Service Dogs training at the Minneapolis–Saint Paul International

Airport.

Can Do Canines, New Hope, MN

ADI, NA supports the ACAA limiting passengers to transporting one service animal.

Psychiatric Service Animals

ADI, NA holds that Psychiatric Service Animals (PSAs) should be classified under “Service Animals” because they perform one or more tasks to mitigate their

partners’ disability. PSAs also receive training on behaving properly in public.

ADI, NA holds that PSAs differ from ESAs because ESAs are not required to have any training to mitigate their partners’ disability nor are they required

to have any training on how to behave in public.

The same questions allowed by ADA to regarding someone claiming their animal is a service animal would apply to a PSA:

list of 2 items

- Is that a service animal? (dog)

- What does it do for you?

list end

The answers should be – yes and secondly, a description of a physical task or tasks the animal performs such as “wakes me up from a nightmare”. Answers

such as “offers comfort”, “helps calm me down” do not constitute tasks. The latter are what ESAs do. As one trainer said, “If a Teddy Bear can do it, it’s

not a service dog”.

Service Dogs and their partners going through security at Denver International Airport.

Freedom Service Dogs, Denver, CO

ADI, NA member organizations include Psychiatric Service Dog providers. They must train their dogs in public behavior as well as assistive tasks. Their

training in public behavior equips them to behave appropriately in air travel. This training also conditions them to accept air travel without undue stress

to the animal itself.

Documentation for Psychiatric Service Animals

ADI, NA holds that DOT should revise its service animal regulation under the

ACAA to match the Department of Justice’s (DOJ) ADA service animal regulation, and

prohibit airlines from requiring PSA users to provide a letter from a licensed mental

health professional as a condition for air travel. The effective alternative methods to

prevent fraud are those already used to prevent fraud for traditional service animals.

Asking the two questions, cited above and observation of the animal’s behavior. If any

service animal behaves inappropriately e.g. barking excessively, growling, snapping,

toileting indoors, stealing food from tables, other passengers or the floor, the airport and

airline personnel may ask the service

animal users to remove the dog

regardless of its status as a service

animal.

ADI, NA holds that airline personnel can use the two questions cited above to distinguish PSAs from ESAs. Strict penalties for fraud should discourage

people from falsely claiming their animal is a PSA to the same extent they discourage passengers from claiming their animal is a traditional service animal.

Service Dogs focus on their handler even when being touched by third parties. Note the dog’s eye contact and relaxed body language. Savannah/Hilton Head

International Airport

Palmetto Animal Assisted Life Services (PAALS), Columbia, SC

Again, the main test is the animal’s behavior. The animal, in ADI, NA’s case, dog, should be calm, responsive to its partner’s cues (commands) for behaviors

and not barking, excessively sniffing, growling, eating food from the floor or any source other than that offered by the dog’s handler, toileting indoors

or displaying other disruptive behavior. The dog does not have to be 100% perfect; however, it should be under the control of the handler. The dog should

always be leashed or harnessed. These characteristics are easily observed by airline personnel.

ADI, NA agrees that there can be a cost for PSA and other service animal users to obtain medical documentation. ADI, NA also points out that:

list of 3 items

• There can be a significant time delay in obtaining medical documentation

• A passenger’s doctor may not be involved in the passenger’s decision to obtain a PSA; therefore, the doctor may not be aware of it or prepared to comment

on it

• “Parentalism” is a term used by the disability community to mean others treating

disabled individuals as children, not capable of making their own decisions. Requiring a

third party to sign off on a disabled individual’s need for or decision to acquire a PSA can

be seen as parentalism. Disabled individuals, like everyone else, seek to make their own

decisions regarding the solutions to mitigate

their challenges. They should not be

required to “have an adult’s permission” or

“parent’s note” justifying their choice to

utitlize a PSA.

list end

Advance Notice

ADI, NA holds that passengers traveling with PSAs should not be required to give advance notice prior to travel. This is because PSAs are trained to task

and also for public outings at the same level as traditional service dogs. They perform tasks such as waking up their partner from a nightmare. The distinction

is that ESAs provide comfort just by being there and are not required to have any training including for public outings. As one trainer says, “If a Teddy

Bear can do it, it is not a service dog”.

Service Dog Vancouver, Atascocita, Texas, flying from George Bush International Airport, Houston to Washington, D.C. Note the relaxed body language.

Service Dogs, Inc., Dripping Springs, TX

Passengers with Service Animals and Psychiatric Service Animals should be treated the same under both ADA and ACAA.

ADI, NA holds that there is no reason to retain the 48 hours’ advance notice requirement of PSAs. This would not apply to ESAs because ADI, NA holds that

ESAs should not be allowed to travel in the cabin outside of a carrier, if at all. The impact of the 48 hours’ notice requirement can reasonably be seen

as imposing discriminatory restrictions on passengers traveling with PSAs who need to fly at the spur of the moment for funerals, hospitalizations or other

emergencies, or who seek to fly within 48 hours for non-emergency matters.

Emotional Support Animals - Containment

Should emotional support animals be required to travel in pet carriers for the duration of the flight?

Answer: Yes, in the event the DOT decides to continue to allow them to travel in the cabin.

Should the DOT continue to include ESAs in its definition of a service animal under the ACAA?

Answer: No.

Unlike service animals, as defined, trained and recognized by Assistance Dogs International, ESAs are not trained to perform a “specific active function”

or task. Furthermore, ESAs are not trained for public work. ESAs are not equipped nor prepared to behave appropriately in public. Air travel is an even

more intense and complex environment than typical public facilities like stores and restaurants. ESAs will likely be highly stressed and fearful in the

air travel environment. This stress and fear can prompt aggression, vocalizing, toileting and other harm, destruction or disturbances to passengers and

crew. It can also harm the animal itself.

A Service Dog tucked neatly and calmly under a seat flying out of Daniel K. Inouye International Airport, Honolulu

Hawaii Fi-Do Service Dogs, Kahuku, Hawaii

Other Federal Laws, ADA and Fair Housing Act

The ADA does not classify ESAs as service animals, nor do most state statutes.

Although the U.S. Department of Housing and Urban Development (HUD) in the Fair Housing Act considers animals that provide emotional support to persons

with disabilities to be assistance animals, this policy applies to a home environment only. A home is not comparable to public air travel. Obviously, air

travel involves the actions and needs of many people and is a more crowded and complex environment.

ADI, NA feels that the amended definition of service animals should not include emotional support animals.

Documentation of ESAs

Should the DOT continue to allow ESAs to fly in cabin, ADI, NA feels that a letter from a licensed mental health professional stating that the passenger

under his or her care for the condition requiring the ESA and specifying that the passenger needs the animal for an accommodation in air travel or at the

passenger’s destination is insufficient to ensure that the ESA is fit to travel because the licensed mental health professional does not have any knowledge

of the animal, its training or behavior. Furthermore, the licensed mental health professional is not qualified to address the ESA’s level of training or

potential behavior in the air travel environment.

Service Dog training organizations instruct their clients how to prepare their dogs for long flights. This includes learning how to tuck into a small space,

calmness and arranging the dog’s feeding and water schedule so it is “empty” for the flight. Denver International Airport

Freedom Service Dogs, Denver, CO

Because ESAs are not required to have any training, any documentation of a passenger’s need for an ESA fails to address the issue that causes problems

in air travel, the ESA’s training and behavior. An animal that is behaving poorly or is itself stressed would presumably decline in its benefit to its

partner as emotional support because it is in distress itself and/or is distressing others.

Other types of proof for carriage of ESAs in the passenger cabin and advance notice do not address the issue of non-training, poor behavior and stress

to the ESA itself either.

Containment of Emotional Support Animals

If DOT adopts a rule that continues to require that ESAs be accepted for transport in the aircraft cabin, should DOT allow airlines to require that ESAs

be in carriers for the duration of the flight?

Answer: Yes

As stated above, ESAs are not required to have any training. Therefore, for the

maximum safety for airline crew, passengers, service animals and the ESAs themselves,

ESAs should remain in their carrier for the duration of their flights. The carrier itself may

be stored under the ESAs passenger’s seat space or be held on the passenger’s lap.

If the emotional support animal is too big to fit in a pet carrier, it should not be allowed on the plane for the same reasons stated above – the dangers

posed by lack of training.

Species Limitations – Dogs Only

ADI, NA feels that species of service animals should be limited to dogs. Dogs are the most common species of service animals trained worldwide. Allowances

can be made for miniature horses already in use for guiding people who are blind; however, these should only be grandfathered in for miniature horses currently

in service, or in service as of some previous date.

Service Dogs are trained to behave calmly in the hectic environment of the airport, as well as in the confined space of the airplane cabin.

Can Do Canines, New Hope, MN

As stated in the summary ADI, NA consists of 73 assistance dog/service dog training organizations. These are comprised of 64 American assistance dogs training

organizations and 8 Canadian assistance dog training organizations. The ADI, NA organizations have trained a total of 17,504 service dog teams that are

currently active in North America. Limiting the species of recognized service animals to dogs would not cause harm to individuals with disabilities.

ADI, NA feels that the DOT should not designate capuchin monkeys or miniature horses as service animals. Capuchin monkeys are not domesticated animals.

Aversive techniques such as pulling their teeth or the use of electronic shock collars are used to force them to perform behaviors. Not only is this unethical,

it can increase aggression. Subjecting these animals to further stress in the air travel environment increases the chance of them behaving aggressively

or at least disruptively during air travel. It is also an endorsement of inhume treatment of these wild animals.

Miniature horses are not commonly used as service animals. Restricting the

definition of service animals to dogs will not impact a great number of individuals, if any.

This is the case for other species of animals, as well. The training industry trains dogs to

assist individuals with disabilities. Dogs have both the temperament and the capability of

assisting people with disabilities to mitigate their disabilities through the performance of

tasks, well beyond merely comforting the individual. Over 100 years of training dogs to

assist individuals who are blind or who have other disabilities attests to the fact that the

vast majority of travelers using trained service animals use dogs.

If the Department were to adopt a rule that continues to require airlines to accept ESAs for transport, ADI, NA recommends that dogs or cats that can travel

in carriers be the only animals accepted. That way, they can travel with the least amount of chance of injuring airline personnel or passengers; although,

they will still be subject to stress themselves. Anyone can claim emotional support from any species of animals; however, this does not mean that the animal

can safely travel by air. Air travel can be stressful for any animal. It is all but guaranteed to be stressful for an animal with no training in public

work.

Public Behavior Training

Should the DOT amend its service animal regulation to allow airlines to require that all service animal users attest that their animal can behave properly

in a public setting?

Answer: Yes.

ADI, NA agrees that passengers should not bring animals onboard that do not behave properly in a public setting. ADI, NA agrees that disruptive behavior

includes running around freely in the aircraft or airport, barking or growling repeatedly at people, biting, jumping on people, urinating or defecating

in the cabin or gate area and also stealing food from the floor or from people. ADI, NA can understand that airline employees are challenged to observe

animal prior to flight given lack of staffing and the hectic and time-sensitive nature of air travel.

ADI, NA supports the Department amending its service animal regulation to allow airlines to require that all service animal users attest that their animal

can behave properly in a public setting. This attestation seems to require a mere addition to the reservation process, such as a check box.

ADI, NA anticipates that there is capacity for fraud in this process. Passengers with untrained animals could simply attest that their animals can behave

properly in a public setting. In those cases, airlines are back where they started, with airline personnel unable to consistently gauge animals’ behavior

prior to board due to the circumstances above. If DOT includes a penalty for lying on the attestation, that inhibit fraud in the reservation process.

Hearing Dog Derby focusing on his trainer at Austin Bergstom International Airport’s baggage carousel

Service Dogs, Inc., Dripping Springs, TX

Alternatives to requiring documentation to assess the service animal’s behavior.

ADI, NA agrees that the need for assurance that the service animal can behave properly is greater in air travel, as air travel involves people being in

a limited space for a prolonged period of time without the ability to freely leave the aircraft.

ADI, NA feels that a provision requiring service animal users to attest that their animal has been successfully trained to function as a service animal

in a public setting would only marginally reduce the safety risk to passengers, airline staff, and other service animals face from untrained service animals

because of the potential for passengers with untrained service animals to fraudulently attest to their animal’s training. Perhaps, it would reduce the

number of poorly trained animals on planes; however, those determined to travel with untrained animals could attest to anything required in order to board

with their animals. Perhaps, as stated above, a strict federal penalty for misrepresenting the level of training in such an attestation would inhibit fraud.

It might take a trial period to assess.

ADI, NA feels the impact on passengers with disabilities with appropriately trained service animals of requiring attestation is increased inconvenience

and discrimination from other passengers. However, the degree of inconvenience and discrimination can be minimized by making the attestation a check box

on the reservation process. It could very well be justified because of the unique characteristics of air travel discussed above.

ADI, NA feels that if such a provision is allowed, the airlines should include the provision as a check box in the reservation process that can be completed

at the time of the reservation. Using a check box as part of the reservation process would not require any advance documentation requirement. Therefore,

any barrier associated with an advance documentation requirement would be avoided.

ADI, NA feels that the proper balance between ensuring passengers with disabilities do not encounter barriers to air travel and protecting the health and

safety of passengers and airline crew can be achieved in the same manner that a similar balance is achieved with public accommodations under the ADA –

by observation by the airport and airline staff of the animal’s behavior in the airport. No advance screening process can accurately predict an animal’s

behavior in an airport. Even if an animal behaves will in a screening process, it can still behave poorly in the airport environment. Additionally, such

screening processes pose the following problems:

Service Dogs are so well trained in air travel that they often fall asleep on the flight.

Hawaii Fi-Do Service Dogs, Kahuku, HI

list of 3 items

• Creates a financial burden to create and maintain, as in “unfunded mandate”

• Creates a time consuming, financially and logistically burdensome challenge for a disabled person to get his or her dog screened by a third party agency

• Unqualified screening personnel. The following organizations have been proposed

as screening bodies:

list of 3 items nesting level 1

o Retail chain pet supply stores

o TSA

o Animal rescue organizations

list end nesting level 1

list end

Trainers at retail pet supply chains lack the credentials, experience and skills to

assess service animals. Service animals, such a guide dogs, are trained by dog trainers at

the highest level of sophistication, experience, and theoretical and technical

understanding and competency.

The TSA obviously is not a dog behavior organization

. Animal rescue organizations deal with canine behavior on a very broad, rudimentary basis to assess rescued animals to become pets. They also do not have

the training or expertise to screen service dogs.

Reporting to any of these organizations imposes multiple discriminatory burdens on disabled individuals seeking to travel with service animals including:

list of 3 items

• Time and travel cost to report to the screening facility

• Availability of screening facilities to disabled individuals living in rural or remote areas

• Cost of screening, should the certifying organization decide to charge

list end

ADI, NA offers our expertise as an educational resource to train the airline industry to recognize appropriate dog behavior in the airport environment.

This can include video, printed and digital materials and webinar or in person training sessions.

ADI, NA holds that if the DOT allows airlines to require attestation that an animal has received public access training, that attestation should be limited

to certain types of service animals:

list of 2 items

• Species: dogs

• Types:

list of 5 items nesting level 1

o Guide Dogs – guide people with visual challenges

o Hearing Dogs – alert people with a significant loss of hearing to sounds

o Service / Mobility Assist Dogs – assist people with mobility challenges by performing a variety of tasks, e.g. retrieving, opening doors, nudging paralyzed

arms and legs into position

o Seizure Alert Dogs / Seizure Response Dogs – alert or respond to their partners’ seizures

o Psychiatric Service Dogs – assist people with PTSD and other

emotional challenges by performing tasks including waking them up

from a nightmare, turning on lights before the person enters the room,

positioning themselves between the person and other individuals

list end nesting level 1

list end

ADI, NA takes the position that service animals should be defined by the DOT and the ACAA in the same way that they are defined by the ADA.

Control of the Service Animal

ADI, NA feels that tethering or other similar restrictions should be a condition for permitting travel with a service animal. The ADA and most state statutes

state that the service animal must be properly leashed or harnessed in public unless being “off-leash” is necessary for it to do its job. Being off-leash

can be necessary for some Hearing Dogs to lead their deaf or hard of hearing partners to a sound; however, in environments that the dogs are in daily,

the Hearing Dog learns the locations of the sounds and soon does not need to be off leash to locate them. ADI, NA agrees that should a Service Dog, such

as a Hearing Dog, be off-leash for the purpose of fulfilling its job, it should still be under another form of control by its owner, such as voice control.

This is as much for the safety of the service dog as of other animals, passengers and staff in the airport or on the airplane. This is also the case when

the person with the disability is not able to physically hold a leash, tether or harness. The service animal should still be under that person’s control.

In some cases, the service animal is tethered to the person’s wheelchair. On an airplane, when the wheelchair is absent, the service animal can be tethered

to the arm of the passenger’s seat or remain laying down at the passenger’s feet under the passenger’s control. ADI, NA feels that this type of requirement

would absolutely minimize the likelihood of unwelcome or injurious behavior by a service animal to other passengers or airline staff.

Service Dog training organizations train their clients and dogs extensively in calm walking at the client’s side. The dog’s nose should be even with the

person’s knee, whether the handler is walking or in a wheelchair. Denver International Airport

Freedom Service Dogs, Denver, CO

Large Service Animals

Should the Department allow airlines to limit the size of emotional support animals or other service animals that travel in the cabin?

ADI, NA feels that emotional support animals do not have the training necessary to travel in the cabin regardless of their size.

Working with airline and airport personnel contributes to effective results and insight into each group’s needs. Savannah/Hilton Head International Airport

Palmetto Animal Assisted Life Services (PAALS), Columbia, SC

ADI, NA feels that service animals, should be restricted to dogs. ADI, NA recognizes that occasionally larger dogs such as Great Danes and Mastiffs are

used as service animals. If larger dogs such as these possess sufficient training to behave in the airport and airline setting – namely remain calm and

responsive to their owner’s behavioral cues (commands), then the airlines should accept them for travel inside the cabin regardless of their size. Some

individuals use larger size dogs to physically support them in case of challenges in balance, (e.g. Parkinson’s Disease) or to pull a manual wheelchair

at times. ADI, NA recognizes that airlines have decreased leg space and foot space on airplanes, or now charge an additional fee for increased leg space

and foot space. ADI, NA agrees with the airlines’ current policy that a service animal’s reasonable use of a portion of an adjacent seat’s foot space does

not deny another passenger effective use of the space for his or her feet and is not an adequate reason for the carrier to refuse to permit the animal

to accompany it user at her or her seat. ADI, NA feels that if a passenger has concerns about a service animal using a portion of that passenger’s foot

space, then the airline can come to an agreement with the aggrieved passenger to change his or her seat, similar to what the airline does with a passenger

who does not wish to sit near a service animal because of allergies.

Veterinary Forms

What increase in animal misbehavior, if any, is sufficient to warrant a general requirement for a veterinary form regarding the health and behavior of

a service animal without an individualized assessment that a service animal or emotional support animal would pose a direct threat to the health or safety

or others or would cause a significant disruption in the aircraft cabin?

Veterinarians are medical practitioners, not animal trainers or behaviorists. Veterinarians’ expertise and practices do not include certifying anything

related to animals’ future behavior. This is especially true in the case of attesting that an animal will or will not maintain a certain standard of behavior

in a complex, hectic environment. Furthermore, such certifications or attestations would cause them to incur additional civil liability and thus, higher

malpractice insurance rates.

Therefore, ADI, NA feels strongly that veterinarians will not issue documentation regarding the future behavior of any animal including an emotional support

animal or a service animal. ADI, NA also strongly agrees that veterinarians are not qualified to do such. This includes a prediction of whether or not

the animal would pose a direct threat to the health or safety or others or would cause a significant disruption in the aircraft cabin.

ADI, NA feels that the Department should explicitly prohibit airlines from requiring veterinarian forms regarding the health of the service animal as a

condition for permitting travel with a service animal beyond those specifically allowed by the Department in its regulation unless there is an individualized

assessment that such documentation is necessary. ADI, NA agrees with the reasons for this policy cited by the DOT in its document Docket No. DOT-OST-2018-0068,

RIN No. 2105-AE63, Traveling by Air with Service Animals on page 37:

list of 2 items

• A requirement of a veterinarian form 48 hours in advance of scheduled travel

means persons with disabilities who use service animals are unable to fly should

there be an emergency.

• Policies that animals be visually verified at airport check-in would prevent

passengers with disabilities who use service animals to check-in online like other

passengers.

• Airlines establishing their own policies for air travel with a service animal could result in a patchwork of service animal requirements, making it difficult

for persons with disabilities to know what to expect and how to prepare for travel.

list end

ADI, NA also agrees with the American Council for the Blind, the National Federation for the Blind and other disability rights organizations that blind

people have used guide dogs safely for decades and should not have barriers placed on travel. ADI, NA also points out that other properly trained service

animals, besides guide dogs, have traveled safely for decades. ADI, NA holds that the issue is the level of training of the animal, not its health, that

poses the threat. Therefore, the Department should prohibit airlines from requiring veterinarian forms regarding the animals’ health, which is not the

cause of the issues the DOT is addressing and causes discrimination for disabled passengers; and, veterinarian forms regarding the animals’ behavior because

veterinarians are not qualified or willing to attest to their animal patients’ future behavior.

Code Share Flights

ADI, NA does not have a position on this issue.