

2018

A Qualitative Case Study on Best Practices of Emotional Support Animal Policies

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Eastern Illinois University

This research is a product of the graduate program in [College Student Affairs](#) at Eastern Illinois University.

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A Qualitative Case Study on Best Practices of Emotional Support Animal Policies

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B.S., Saint Leo University, 2012

THESIS

SUBMITTED IN PARTIAL FULLFILLMENT OF THE
REQUIREMENTS FOR THE DEGREE OF

Master of Science in College Student Affairs Degree
In the Graduate School, Eastern Illinois University
Charleston, IL

Spring, 2018

Thesis Committee:

5-7-18

Date

5-5-18

Date

5-1-18

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5-1-18

Date

A Qualitative Case Study on Residential Life Best Practices of Emotional Support

Animal Policies

Eastern Illinois University

Jordan E. Dadez

Abstract

This study sought to understand the best practices and protocols of Emotional Support Animal policies in residential life. A qualitative case study was conducted to provide insight on the best practices of residential life Emotional Support Animal Policies. Four participants from institutions with established policies were interviewed to gain understanding of these protocols and policies, what is involved in the approval and accommodations process, and what challenges the participants face. The results showed a need to evaluate and change the current process that most institutions utilize for Emotional Support Animal approval. The approval process and accommodations process are two separate processes, which means that Disability Resources and Residential Life should have a strong collaboration. Results of this study may not be applicable to every institution because every institution faces different challenges unique to their campus.

Keywords: Emotional Support Animal, ESA, Residence Life

Dedication

This thesis is dedicated to Student Affairs professionals who wish to better serve their students and their campus. May you use it as a tool to fix or create a process to accommodate students who might need it most.

Thank you to all who supported me in this process, including my family, my cohort, and my faculty. I could not have completed this without you.

Thank you to my best friend, Alexis J. Hill, for standing by me through all the tests, papers, and tears that graduate school threw my way. I don't know if I could have done it without you.

Thank you to my fiancé, Michael T. DiPalma, for encouraging me to attend graduate school and pushing me to be a better version of myself always. You stood by me in thick and thin, and your support means the world to me.

Thank you to Dr. Edward Dadez for getting me in to the family business of Student Affairs.

Last but not least, thank you to my biggest fan, my best friend, and my ESA, Jack. I certainly would not have been able to complete this process without you, and I love you dearly.

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Chapter 1

Introduction

Over 40 million people in the United States live with a mental illness (Mental Health America, 2016). More than half of adults with mental health issues do not receive or seek treatment in the United States for their conditions (Eisenburg, Golberstein & Gollust, 2007). “Seventy five percent of mental illnesses are onset by age 24 and 43.8 million adults, about one in five, experienced a mental illness in 2012” (Mental Health America, 2016). With most mental health disorders emerging between the ages of 15 and 24, mental health is something that is becoming a topic of concern in the realm of healthcare and on college campuses across the nation due to the fact that approximately half of American youths attend college (Eisenburg et. al, 2007). “1 in 4 students have a diagnosable illness, and 40 percent of those students do not seek help for their mental health problems” (<https://www.nami.org/Learn-More/Mental-Health-Conditions>) With these staggering numbers we are left to question how are they coping emotionally and how does it impact their academic success?

A record number of students are using campus counseling services for longer periods of time with more severe conditions (Kitzrow, 2003). Most campus counseling centers are not equipped to help these students due to the severity of their conditions, budgetary constraints, and small staffs (Kitzrow, 2003). Whether these students choose to seek counseling on campus or off campus, the diagnostic process is very similar with the only difference being that counseling centers may not be able to prescribe a specific treatment or prescription and must make a referral when this treatment is required (Wang, 2007). Every mental health disorder is listed in the Diagnostic and Statistical Manual of

Mental Disorders Fifth Edition (DSM-V) with a list of criterion that must be met for that diagnosis to be made. As a therapist meets with their client, they will start to check off certain criterion from certain mental health disorders in determining the diagnosis of the client (DSM-V, 2013). Throughout their sessions, the therapist will be able to narrow down the diagnosis; in order to work with the client to develop a treatment plan specific to their needs and lifestyle. Usually, the preferred treatment is behavioral therapy with prescription drugs being the least preferred method by therapists and clients (Wang, 2007).

Due to the rising diagnoses of mental health disorders among college students, more and more students are seeking counseling and psychiatric help. One option for support in treatment that is growing is an Emotional Support Animal (ESA) (Taylor, 2016). An ESA is an animal that provides companionship, relieves loneliness, and sometimes helps with depression, anxiety, and certain phobias, but does not have special training to perform tasks that assist people with disabilities (Brennan & Nguyen, 2016). Due to the calming benefits that ESA's can offer, more students are going through the process to become approved to have an ESA (Taylor, 2016). With this increase in ESA requests, higher education institutions need to update or implement new policies (Taylor, 2016).

ESA requests are a new phenomenon happening on college campuses (Dermott, 2016). Approving these requests can make campuses more accessible for students with mental health disabilities, as well as enrich the educational community by accommodating a broader range of students (Dermott, 2016). However, institutions must approve these requests amid a confusing array of anti-discrimination laws (Dermot,

2016). Some institutions have gone to court, and case law has provided a bit more guidance (ACUHO-I, 2017). For example, a reasonable accommodation can now be a single room, and it also allows the institution to consider factors in approval of the ESA (ACUHO-I, 2017). Some of these factors include neighboring rooms or roommate allergies, the animal's size, and vaccination records (ACUHO-I, 2017).

Thirty-eight percent of higher education institutions do not have a policy strictly for ESA's, but they do have some regarding service animals, while another 38% of higher education institutions recommend other resources before handling the student's request (Kogan, Schaefer, Erdman, & Schoenfeld-Tacher, 2016). This statistic begs the question: What are the policies and processes for approval on college and university campuses regarding ESA's? Most universities state that even a limited number of requests puts a strain on the institution, including housing, disability services, and student affairs (Bauman, Davidson, Sachs, & Kotarski, 2013).

My Story

This topic of research is important to me because it is also personal. During my sophomore year I experienced two major traumatic events, and as a result, was highly encouraged to seek counseling. I could not afford a private therapist, so I utilized the counseling center on my campus. I used their services up until I graduated, but I never truly felt that I gained control of my symptoms or my emotions. I still suffered from anxiety, panic attacks, night terrors, and flash backs. Upon graduation, I was hopeful that relocating back home would help with these symptoms.

While I was home for the summer, I felt my anxiety decrease, but at night and when I was alone it would flare up. After about a month of horrible sleep and jumping

every time I heard my name, one of my co-workers at my part time job suggested that I get an Emotional Support Animal. I had heard of them from my counseling sessions at my undergraduate institution, but was still unsure of what they did, and how I was to go about getting one. I did my research on the internet and found multiple websites that would grant me certification for under 150 dollars, and I instantly was outraged. These websites are making a mockery of people who genuinely have a need for an ESA or service animal and these websites are issuing letters for people who essentially want a pet. I kept researching and found a breeder of golden retrievers and hounds who are trained to be service animals. I scrolled through the puppies thinking about if I actually needed one and if it would benefit me emotionally. I had grown up with dogs and cats, and they were always a nice distraction for me when I was going through a tough time. I contacted the breeder to inform her of my interest.

I was contacted the next day and I was able to go pick up my puppy in one week. During this week I was at war with myself trying to determine if I made the correct decision. I picked up Jack, my new dog, and I was so overwhelmed emotionally, in a positive way. I held him as my parents drove me home and I could feel the outer layer of my anxiety melting away. Throughout the summer, I trained my ESA, I ran with my ESA, and I slept with my ESA. If I was not working, I was with my ESA. When I had nightmares, I would wake up, and my ESA would be waiting to lay on top of me. When I had a panic attack, my ESA would lay his head on my chest.

One of the hardest things I had to do was leave my ESA at home because I had not received the required certification to have an ESA at the institution I was attending for graduate school. I thought that it would be difficult at first, but I could readjust to a

life without my ESA once more. For a month I did okay, but it was not long after the first month that all my old symptoms returned. I decided after one particular panic attack that I should seek professional therapy.

I saw my therapist for three months as we worked through some pretty serious issues and I mentioned that I missed my ESA. He asked me to tell how I felt when I was with my ESA and how I felt without them. After a long description, he stated that he believed I would benefit greatly from having my ESA here, and he asked me to figure out how I would become certified through my institution for one.

I called the disability office at my institution and asked how I would go about certification for an ESA on campus and I was told that all the information I needed was on the website. I looked at the website, clicked on the tab that said ESA, and was presented with forms my therapist would need to complete. Naturally I had more questions, and was a bit frustrated with the vague nature of the website.

When I gave my therapist the forms the next week, he expressed concerns that he did not know how to correctly fill out the forms because these forms were for physical disabilities only. I called the office back and asked if they were the correct forms. I was told that if I clicked the ESA forms, they were the correct forms. I brought back the forms to my therapist and said that the office said they were the correct forms.

I waited several weeks to hear back from someone in the office once I submitted all of my paperwork. When I was contacted and went in for my meeting, I was very nervous. I did not know what questions I was going to be asked and I was hoping that this whole process would not have been for nothing. I was asked a series of questions regarding my ESA, and I informed her that he was a medium sized dog with all his shots,

he was neutered and housebroken, and he is friendly. I still left without a final decision. However, one week later I received an email from her office stating I was approved to have an ESA. I informed the housing department that I would be bringing Jack back after break, as well as gave them a copy of my certification.

This experience paired with a lecture on reasonable accommodations in my law class made me start to think about what this process looks like at other campuses. I reached out to a family member who is also in student affairs, and I asked them how their campus handles ESA requests. They stated they must go through the disability resource office. I started to think about how I would handle the situation if I was in the position to do so, and the specific things I would change about the process.

Purpose of the Study

The purpose of the study was to understand how higher education institutions create processes and policies regarding ESA's, specifically from the Residence Life perspective. The results of this study provide institutions with information that will assist in understanding this population better, as well as providing a road map for updating their policies to better serve the growing needs of their students.

Research Questions

There is an increasing number of students who are enrolled in undergraduate institutions that request or are prescribed an ESA. This study was guided by the following research questions:

1. What is involved in approving a request for an ESA?
2. How do administrators go about accommodating student requests for an ESA?

3. What challenges do administrators identify in granting students' requests for an ESA in campus housing facilities?

Significance of the Study

This study is significant because it provides various institutions insights on how ESA policies and processes are being developed at other institutions who have established protocols. An institution who is working on developing their process can read the results to see what worked best, what did not work, as well as to find other resources on how to successfully develop and implement their policy at their specific institution.

An important piece to ESA policies to remember is that reasonable accommodations must be met for both parties (Ensminger & Breitkopf, 2009). Allan Blattner, the president of the Association of College and University Housing Officers, expounds on this point by stating, "Residence halls are not exactly places considered to be pet friendly. We want to support the students and the safety of the animals, but also other students who may have allergies or fears" (Taylor, 2016). Bauman, Davidson, Sachs, and Kotarski (2013) stated that some of these steps are invasive of the students' privacy and can make them feel inadequate for having a mental health disorder that is out of their control. One step that appears to be universal with ESA policy includes obtaining a letter of approval written from a licensed therapist as proof that there is a need (Boness, Boisvert, and Younggren, 2016).

Limitations of the Study

There are a few aspects that could have slowed the progress of this study, as well as limited the outcomes. One possible limitation is that participants may have been hesitant to share their process or policy because of the lack of information. Participants

could also have felt guarded due to the legal nature of ESA's and the unclear legal ground they present.

As with every study, there could have been multiple causes for the results of the participants' experiences (Fraenkel, 2015). For example, one campus may have received numerous requests each academic year for an ESA, while another campus could have received little to no requests each academic year. How long the policy has been in place at the institution could have also caused a lack of base knowledge of the short term and long-term effects that did not allow the participant to fully participate in all the interview questions. Inconsistent external variables could be responsible for the outcome of the study, instead of a common phenomenon that all campuses experience, which can call into question the validity of the results.

Transferability of results to other institutions could also be a limitation because each institution has different policies, procedures, and protocols regarding ESA's. While there are certain federal guidelines that each institution must follow, that does not ensure they are followed the same exact way across the board. The language itself used to outline the federal guidelines, which is what institutions base their policies off of, is confusing and vague (Ensminger & Breitkopf, 2009). Because of these limitations the researcher worked to provide the analysis and discussion in a way that would help streamline how the participants talked about their protocols as well as providing the reader with useful insight in to developing a process for themselves.

Perhaps the biggest limitation of my study was my own bias as a researcher. I have an ESA which helps me cope with my anxiety and PTSD, so I am a firm believer in the benefits that ESA's hold. In order to counter act the bias I hold, I asked objective

questions and used the same protocol in every interview. Additionally, I had others read my transcripts and assist in the analysis process. As information was gathered and analyzed I also engaged in conversations with my thesis advisor and members of my committee to make sure that I was presenting the material in an accurate and fair manner so that it would be most useful to the reader.

Definition of Terms

Disability. A physical or mental impairment that substantially limits one or more major life activities of such individual, a record of such impairment, or being regarded as having such impairment (Sec. 12102, p.7, 1990).

Disability Resource Office (DRO). A designated department by the institution to determine reasonable accommodations and services (Evans, Broido, Brown, & Wilke, 2017).

Diagnostic and Statistical Manual of Mental Disorders Fifth Edition (DSM-V). The handbook used by health care professionals as the authoritative guide to the diagnosis of mental health disorders (DSM-V, 2013).

Emotional Support Animal (ESA). An animal that can provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias, but do not have special training to perform tasks that assist people with disabilities (Brennan, 2016).

Law. A body of rules of conduct of binding legal force and effect prescribed, recognized, and enforced by controlling authority (West's Encyclopedia of American Law, 2004).

Mental health. A state of well-being in which every individual realizes his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to her or his community (WHO, 2014).

Mental illness. Mental illnesses refer to disorders generally characterized by dysregulation of mood, thought, and/or behavior, as recognized by the Diagnostic and Statistical Manual, 4th edition, of the American Psychiatric Association (DSM-IV) (CDC, 2016).

Policy. A course or principle of action adopted or proposed by a government, party, business, organization, or individual (Burt & Schuh, 2017).

Service Animal. 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 (ADA, 1990).

Strategy. A plan of action or policy designed to achieve a major or overall aim (Bolman & Deal, 2007).

Chapter Summary

Emotional Support Animals are a growing phenomenon on campuses across the nation. Conflicting and confusing policies muddle the path to approval, while a complete lack of policies leaves universities to blindly create their own path. Students and faculty alike share frustrations either in gaining approval or granting approval but understanding the challenge each side faces is key to providing the support the students are seeking as well as meeting university standards.

Chapter 2

Review of the Literature

Transitioning into college is a challenging time in a student's life, and it can be even more challenging if a student, who has a mental health disorder, is trying to self-advocate for the first time for something they need, such as an ESA. To discern what those challenges look like and to understand this experience from an administrative perspective, this literature review will provide insight towards understanding the process of approving an ESA.

This chapter will discuss the most prevalent mental disorders affecting undergraduate students, the process of diagnosis and various treatment plans available, relevant federal legislature that shapes policies regarding students with disabilities, and case law that redefines how institutions interpreted federal legislature. The processes for developing, implementing, and managing policies on campuses are outlined in this chapter.

Mental Health

According to the Department of Health and Human Services, symptoms of mental health disorders vary by disorder, and are shown in children as young as seven years old, and approximately 1 in 5 youths have a diagnosable mental health disorder, such as bipolar disorder, depression, or anxiety (<https://www.hhs.gov/ash/oah/adolescent-health-topics/mental-health/mental-health-disorders.html>). These disorders follow a developmental course starting in adolescents around puberty up until young adulthood, and if untreated, they can alter the academic, social, and personal development; unfortunately, most of these disorders go untreated due to the stigma that surrounds

mental health (<https://www.nimh.nih.gov/health/topics/child-and-adolescent-mental-health/index.shtml>). If untreated the mental health disorder carries over into the transition to college and throughout the duration of college there has been a marked increase in the number of students enrolled in college with a serious psychological disorder, and increased number of students who are seeking counseling services (Kitzrow, 2009). Student Affairs professionals need to have a solid foundation of mental health terminology, the diagnosis process, the treatment process, prevalent mental health disorders, and cost and access for college students so that they are better able to assist their students become successful.

Terminology. While the terms psychologist, counselor, and psychiatrist seem interchangeable, each role performs different roles in guiding their client through the steps for mental health improvement. A counselor is generally a master's level psychotherapist who focuses exclusively on helping individuals, couples, or families (Wylie, 2010). They focus on common life issues that present problems with normal living rather than severe mental health issues, and counselors cannot prescribe prescription medicine to their clients (Wylie, 2010).

A psychiatrist completes four years of medical school, followed by three or four years of a psychiatric residency, and if they wish to specialize in a specific field of psychiatry, that requires completion of a fellowship of at least two years outside of the residency (Gale Encyclopedia of Mental Health, 2008). Psychiatrists may receive certification from the American Board of Psychiatry and Neurology (ABPN), which requires clinical experience of two years outside of the residency and the successful completion of a written and oral test (Gale Encyclopedia of Mental Health, 2008).

Psychiatrists are licensed physicians, who are able to prescribe medication, admit patients to the hospital, as well as treat the biological, psychological, and social components of mental illness simultaneously (Gale Encyclopedia of Mental Health, 2008).

There are two types of psychologists, and they are clinical psychologists or counseling psychologists (Gale Encyclopedia of Mental Health, 2008). The Mental Health Disorders Sourcebook defines a clinical psychologist as:

A professional who treats mental illness, emotional disturbance, and behavior problems. They use talk therapy as treatment and cannot prescribe medication. A clinical psychologist will have a master's degree (M.A.) or doctorate (Ph.D.) in psychology, and possibly more training in a specific type of therapy (2016, p. 164).

A counseling psychologist typically works in private practice, and they focus on individuals who have fewer pathological mental problems, whereas a clinical psychologist focuses on clients with one or two serious mental illnesses (Gale Encyclopedia of Mental Health, 2008). If a psychologist is in the on-campus counseling center, they would most likely be a counseling psychologist, as clinical psychologists typically work in hospitals or private practice due to their intensive case load (Mental Health Disorders Sourcebook, 2016).

Diagnosis. Student Affairs' professionals are usually the first to contact a student who is troubled, upset, or unsure (Reynolds, 2017). Students can be troubled or upset for a multitude of reasons, including but not limited to financial concerns, familial problems, relationship issues, or academic struggles (Bishop, 2006). Student affairs professionals redirect students to the appropriate resources to resolve minor and isolated cases of stress,

but student affairs professionals may not always know if a student is in need of additional resources, or if they have underlying psychological issues (Reynolds, 2017). When it is clear that a student is exhibiting concerning behavior potentially due to a mental health concern, the student affairs professional can refer to them a professional counselor or psychologist at the campus counseling center (Reynolds, 2017).

In a study conducted by Sevig and Soet (2006), almost 30% of college students reported that they have been or are currently utilizing counseling services, 14% had used prescribed psychotropic medication, and 6.8% were currently taking psychotropic medications. Most counseling centers on college campuses are not equipped to handle the drastic increase in the demand for services, and it is a common practice to refer the student to a local professional counselor or psychologist (Bishop, 2006). In the referral, the initial counselor or psychologist that has met with the student communicates the prevalent symptoms, the onset of symptoms, and the severity of symptoms, so that the secondary counselor or psychologist can begin the intake process with as much information as possible about the client (Jongsma, Peterson, & McInnis, 2006). During the first meeting, the counselor or psychologist will ask a series of questions to determine the present environment, the family structure, personal lifestyle, and professional responsibilities to construct a picture of the client (Jongsma et. al, 2006). In the initial meeting with the clinician, “the client may discuss a variety of issues during the assessment, but the clinician must determine the most significant problems on which to focus the treatment process” (Jongsma et. al, 2006, p. 1). When diagnosing the client, each problem that is selected for treatment requires a specific definition of how it is

evidenced in the client, and the symptoms should follow diagnostic criteria and patterns as evidenced in the DSM-V (DSM-V).

Cost and Access

The Current Population Survey conducted by the U.S. Census Bureau (2016) shows that the percentage of people with health insurance coverage for all or part of 2015 was 90.9 percent. For those who do seek treatment, 90.9% will be able to have a portion if not all of the treatment plan covered financially, while an estimated 9.1% will have to cover the cost themselves making access to mental health treatment difficult.

For those students who were unable to receive treatment or went undiagnosed, they arrive at college feeling more overwhelmed than other students, and in 2015, over 48% of students sought out counseling services for mental health concerns (Center for Collegiate Mental Health, 2015). College students are seeking counseling for more severe psychological conditions than seen in the past, and they are utilizing the services for a longer time span (Kitzrow, 2003). While counseling center staff found on universities are able to diagnose, they will refer the student to a local psychiatrist or counseling firm because they do not have the resources, such as staff, funding, and medication, to treat the student short term or long term (Hunt, Watkins, & Eisenburg, 2012).

In the National Survey of Counseling Center Directors, it was found that 42% of counseling centers on college campuses increased the number of staff to help with the demand they were facing (Eisenberg et. al., 2012). With 65% of high school graduates attending college (National Center for Education Statistics, 2016), the demand for mental health help would naturally increase as more students gain access to higher education. Eighty percent of college students have health insurance, while 20% or 1.7 million

college students, do not have access to health insurance (Redden, 2008). Counseling centers are crucial places for uninsured students who are facing mental health challenges; however, counseling centers are the first place that experience budget cuts, and are only given extra funding in the event of a crisis, such as a student suicide (Eisenberg et. al., 2012). For students who have health insurance, they are able to seek treatment after their referral to a local counseling center, while those who do not have health insurance must make due with the resources that are available to them on campus.

Federal Regulations that Affect Higher Education

There are three pieces of legislation that were created with the purpose of protecting and providing equal opportunity to individuals with disabilities. The Americans with Disabilities Act of 1990, the Fair Housing Act, and Section 504 of the Rehabilitation Act are important to remember particularly for public and private institutions who must make accommodations for students with disabilities.

Americans with Disabilities Act of 1990. The purpose of the Americans with Disabilities Act (ADA) of 1990 is to provide anti-discrimination protection for individuals with physical and mental disabilities as well as to provide access to employment opportunities, public accommodations and services, and communication services (Rumrill, Gordon, & Roessler, 1993). According to ADA “the term disability means, with respect to an individual, a physical or mental impairment that substantially limits one or more major life activities of such individual, a record of such impairment, or being regarded as having such impairment” (Sec. 12102, p.7, 1990). The ADA is divided into five titles. Title I applies to employers, Title II applies to public entities, including state and local governments, which covers public higher education institutions, Title III

covers private institutions, Title IV covers telecommunication companies, and Title V is Miscellaneous, which prohibits the coercion or threatening of individuals with disabilities, or violation of the ADA (Patton et. al, 2017). The ADA also extends liability into the private sector, which had previously been exempt from compliance (Rumrill et. al, 1993). Title I, II, and III directly affect public and private higher education institutions and are further discussed below.

One of the main items addressed under the ADA that caused institutions to make changes to their facilities, programs, and services was providing reasonable accommodations. These reasonable accommodations mainly apply to individuals with some type of physical disability (i.e. sight impaired, physical mobility). A reasonable accommodation is defined as a:

modification or modifications to a job or the work environment that enable a qualified applicant or employee with a disability to perform essential job functions. They include adjustments to ensure that a qualified individual with a disability has rights and privileges in employment equal to those of nondisabled employees (Rumrill & Gordon, 1992).

Some examples of a reasonable accommodation could be a ramp, elevator, widened doorways, assistive technological services or devices, lighting, and climate control. Employers are required to provide reasonable accommodations unless the implantation of the accommodation would be an undue hardship, which is when the reasonable accommodation exceeds the bounds of practicality (Gordon et. al, 1993). However, as it stands currently ADA does not cover individuals with an ESA; that is covered under the

Fair Housing Act (FHA) because that animal is not required for assistance in getting around the campus (ACUHO-I, 2016).

For example, a student has been diagnosed with Major Depressive Disorder and they have had their ESA since they were in high school. They are moving in to a residence hall on campus, and requesting reasonable accommodations, stating that they are protected under the ADA policies to bring their ESA. The Director of Residence Life informs the student that technically the ADA does not cover reasonable accommodations for ESA's. However, the reasonable accommodation is made and places the resident on the first floor of the residence hall in a single suite, explaining they are doing so because of the Fair Housing Act. They now have quick exterior access for their ESA and will not potentially trigger allergies for their roommate.

Section 504 of the Rehabilitation Act. Section 504 of the Rehabilitation Act of 1973 was the first piece of legislation that protected people with disabilities from discrimination (Evans et. al, 2017). It provided equal access to those with disabilities to public and private postsecondary institutions (Evans et. al, 2017). Section 504 of the Rehabilitation Act “stipulated that programs or activities that receive federal funding cannot deny otherwise qualified people participation in, and benefits of, their services due to their disability, nor could they discriminate against disabled individuals in any way” (Evans et. al, p. 96, 2017). Individuals with some sort of depressive or anxiety related diagnosis are protected under this act. This meant that public and private higher education institutions that accepted federal funding could not discriminate against qualified students who applied to their academic programs (Evans et. al, 2017). This has led institutions to identify the needs of their different student populations entering college and to identify

ways to make those necessary accommodations to support them. As a result, the field of disability services expanded as campuses met the need for accommodations, and an emphasis was placed upon physical accessibility in renovations and construction on campus (Evans et. al, 2017).

Fair Housing Act. The Fair Housing Amendments Act was passed in 1988 and this act broadened the language used to describe discrimination. It gave the Office of Housing and Urban Development (HUD) more direction and power to enforce policies (HUD, 1998). The crucial piece of this legislation that affects higher education is that a campus dormitory and residence hall are defined as a dwelling, which means that campus housing falls under FHA legislation (HUD, 1998). This definition is significant because it delineates that higher education institutions do not have power to discriminate against students who have disabilities from their on-campus housing facilities. They must provide reasonable accommodations, or the institution runs the risk of a lawsuit or losing federal funding (Section 504, 1973). This is where individuals requesting the support of an ESA becomes explicit for those working in university housing.

What complicates this is that according to Kogan et al. (2016) about 81.3% of universities in the United States of America do not have policies specifically for ESA's. Dermott (2016) noted federal regulations that guide the policies that universities are mandated to have are stated vaguely and broadly. Despite recent guidelines that emerged from case law to correct some aspects of the unclear definitions, the general understanding and perceptions of the legislature was open to interpretation (ACUHO-I, 2016). One way to understand how institutions should respond is looking at the legal system and what cases have been processed through. At this time only one case has been

presented, *United States of America vs. University of Nebraska at Kearney 2013*. In this case, Hamilton filed three requests with the University of Nebraska at Kearney (UNK) to live on campus with her ESA. She had a diagnosis of anxiety and depression for four years prior to these requests. Each of her requests to have an ESA in university housing was denied and as a result Hamilton sued UNK. The Supreme Court ruled that residence halls and campus housing do constitute as a dwelling as stated in the FHA; therefore, all accommodations regarding ESA's must be met (*United States of America vs. University of Nebraska at Kearney, 2013*). This ruling is significant to higher education institutions, especially those with residential facilities, because it now provided a clear directive that they must make reasonable housing accommodations (Kitzrow, 2003).

A student who has an ESA submits an application to have their support animal with them on campus. The institution has to determine what would be reasonable. If the student is wanting to have a snake or perhaps a large dog it may be denied for the safety and security of the others living in the facility. An institution may provide a list of animals they are willing to accept as ESA's (i.e. dogs under 30 pounds, cats, lizards, etc.) To make these reasonable accommodations the institution may also predetermine where they will house individuals requesting ESA's. For example they may put individuals with dogs in one building and those with cats in another building limiting the housing options for the individual. This would also help the institution in accounting for individuals who may not want to live with animals or have severe allergies live with them. However, the student may not be satisfied with the accommodation and find it unreasonable, but the institution has met the requirements under the Fair Housing Act. This is allowed because the student has been provided reasonable accommodations that fulfill the requirements of

their request. It might not be what the student wanted, but reasonable accommodations have been made.

As one can see this has been a challenging area to understand and has been discussed and debated within higher education and student affairs professional organizations. Following the University of Nebraska Kearney case members within the ACUHO-I (2016) organization identified that institutions were going to need to make adjustments to their assistance animals policies and agreements and produced seven factors for institutions to consider when making accommodations for ESA's in an on-campus residence hall setting (ACUHO-1, 2016). The 7 factors are as follows: whether the animal's size is too large for the available space; whether the presence of the animal would force another student out of that space (i.e. allergies); whether the animal violates the peace and enjoyment of the assignment; whether or not the animal is housebroken; whether or not the vaccination record is up to date; whether or not the animal poses a direct threat to others including a history of aggressive behavior; and whether or not the animal has caused excessive damage beyond what is considered reasonable to the school's property (ACUHO-1, 2016).

Challenges to Residence Life Departments

The basic role of residence life on campuses is to provide security, safety, and clean housing to students, and once these basic needs are met the role can become more complex (Riker & Decoster, 2008). Riker and Decoster (2008) describe five levels of general objectives that residence life departments generally strive to meet. These levels operate like a pyramid, and the next level cannot be reached if the previous level is not achieved (Riker & Decoster, 2008). The first three levels are facility-oriented meaning

that they fall under managerial responsibilities (Riker & Decoster, 2008). Level 1 is providing a satisfactory physical environment, level 2 is maintaining that satisfactory physical environment through maintenance and renovations, and level 3 is establishing structure and guidelines for communal living (Riker and Decoster, 2008). For example, a satisfactory physical environment could be the average room found in a residence hall that has one bed, a dresser, a nightstand, a closet, and functioning utilities. To maintain that physical environment, the student would submit a request or work order when one of the provided assets stops working properly. This one room is not the only room on the floor because there are multiple rooms that make up the floor community.

The Residence Life department establishes the policies and basic community expectations and standards for all residence halls on campus, and the Resident Assistant coordinates each individual floors' specific expectations regarding policies. When a student's request for an ESA is granted, it can affect the first three levels of these housing objectives. The ESA could potentially be a dog, cat, hamster, snake, large insect, or any other numerous kinds of animals. The ESA will at the very minimum leave normal wear and tear on the environment or they will damage carpeting, furniture, or walls (ACUHO-I, 2016). Other students living in the surrounding area could be allergic to that specific animal, or fearful of animals, and now their physical environment and perhaps mental health has been disrupted. While allergies or phobias to animals could be considered legitimate grounds in denying an ESA request, the Department of Justice has stated that these reasons are not acceptable for denying a request, and institutions are left to navigate how they accommodate (Dermott, 2016). Both parties, the student with the ESA and the

student with allergies or the phobia, must have reasonable accommodations made for them.

The last two levels are student oriented, which include education or learning objectives. These learning objectives could be specific goals that the department wants the students to learn or accomplish after their residency on campus. Level 4 is the development of an environment that promotes accountability and a conducive learning environment, and level 5 is providing opportunities for individual growth and development, such as student organizations, professional organizations, or academic opportunities (Riker & Decoster, 2008). These levels operate like a pyramid, and the next level cannot be reached if the previous level is not achieved (Riker & Decoster, 2008).

Level 5 is providing opportunities for individual growth and development, such as student organizations, professional organizations, or academic opportunities (,). This means that there is a desire to engage students in these various learning opportunities so that they can enhance their out of class experiences. Engaging students, all students, in these opportunities is not without stress or anxiety for the normal student. A student coming in to college with an ESA is likely going to become involved and their ESA will be a part of their lives. There is often a stigma or skepticism associated with ESA's, especially those who go outside of the normal idea of an animal, such as a lizard or tarantula (Dermott, 2016).

This means that staff are often left to answer the questions to the others in this community about what an ESA is and how the student has received approval. Training staff on the complexities and nuances of the laws surrounding accommodations is difficult due to the constantly evolving definitions and interpretation of the laws

(Dermott, 2016). It is hard to train staff because each case varies greatly from the previous one so only the institution's policies are discussed, which can create ambiguity and uncertainty among staff regarding the university's stance on ESA's (Dermott, 2016). The guidelines that came out after the U.S. vs. University Nebraska Kearny stated that residence life staff members need to be trained in this area, but it does not state which level of staff needs training, or what kind of training they need to complete (ACUHO-I, 2016). This makes educating and preparing staff difficult with vague guidelines. Thus, institutions are left to define what training they need to provide to people in various positions. A person responsible for approving the ESA will have the most extensive training, including how to develop a process and what the legal ramifications may be, often provided off campus. An RA living on the floor is likely to have very little training and it will be more focused on how to articulate what an ESA is and why it is there rather than the process for gaining access.

ESA's affect more than just residential life departments on campus and collaboration with multiple departments on campus is required to ensure successful policy and procedure protocol (ACUHO-I, 2016). ACUHO-I (2016) has identified that housing professionals need to collaborate with multiple campus partners as part of the process in the ESA approval as well as on-going support. Some of these partners could include the institution's attorney, the campus counseling center, disability resources, campus police or security, the department that handles facilities, emergency responders, and all housing staff (ACUHO-I, 2016). Each one of these departments plays a crucial and unique role in student success, which is why collaboration with them is important so that the holistic student can be successful (ACUHO-I, 2016).

Challenges to Disability Resource Offices

The main function of a Disability Resource Office (DRO) is to provide educational and academic accommodations for those in need (Evans, Broido, Brown, & Wilke, 2017). As the campus environments have started to change, additional responsibilities, such as advocacy, outreach, and accommodations for academic and environmental needs, have been bestowed upon DRO's (Evans et. al, 2017). An ESA request might originally appear in a residence life office, but because mental health disorders are considered a disability, the request will be redirected to the DRO (Evans et. al, 2017). The DRO is now tasked with approving or denying the request, and providing reasonable accommodations for the student in the realm of housing (Evans, et. al, 2017). This can be tricky because most DRO's are unfamiliar with housing practices, yet they bear responsibility in providing the reasonable accommodations.

Historically DRO's have been tasked with coordinating accommodations, assessing and maintaining all documentation regarding disabilities and accommodations, and outreach regarding their services (Evans et. al, 2017). DRO's today still carry out these tasks, but DRO's were created to help those with academic or developmental disabilities, such as learning disorders or autism spectrum disorder (Evans et. al, 2017). Today the modern student seeks out the DRO to seek approval for their ESA, but the DRO's were never set up to process or accommodate these kinds of requests.

The Challenge to Approving an ESA

Historically, the emphasis at counseling centers on college and university campuses has been on developmental and preventative counseling, but now the role and functions of campus counseling centers continue to evolve and change in response to

social, financial, and political factors (Kitzrow, 2003). With more access to higher education, more populations are able to attend college than ever before, and more students with mental health disorders are enrolling, but 86% of students with mental illness withdraw from college prior to completing their degree compared to a 45% withdrawal rate for the general student population (Salzer, 2012). Counseling centers need to provide counseling for a broad range of students for various issues including multicultural issues, gender issues, career and developmental needs, life transitions, stress, violence, and serious psychological problems, and this is one of the major challenges facing on campus counseling centers (Kitzrow, 2003).

A key challenge that affects on campus counseling centers is the inability to approve ESA's by their on-campus counselors due to a conflict of interest (Evans et. al, 2017). Counselors that work in on campus counseling centers have a master's degree in counseling or clinical psychology, which makes them unable to diagnose mental health disorders, prescribe medications, or make a recommendation for an ESA (Gale Encyclopedia of Mental Health, 2008). This key difference between a counselor and a psychiatrist or psychologist is why on campus counselors must refer students who they suspect are suffering from a mental health disorder, to off campus psychiatrists, psychologists, and therapists (Gale Encyclopedia of Mental Health, 2008).

Once the appropriate certification has been shown to the DRO office, the DRO office will coordinate with residence life to find a reasonable accommodation (Evans et. al, 2017). It is necessary for all three departments: counseling services, residence life, and disability resources, to communicate and coordinate throughout the accommodations

process, as well as after to make sure the student is receiving adequate resources to help them excel throughout the academic year while coping with their mental health disorder.

Chapter Summary

One of the most challenging parts of being in higher education is developing and implementing policies to keep pace with changes seen in society with limited means or slowly shrinking budgets (Atkins, 2010). The strategic plan or policy is a product, and it is not an evaluation of how well the institution has done in the past accommodating the requests without the guidance of policy; it is a guide outlining the aspired shared vision of that university regarding accommodations for ESA's (Burt & Schuh, 2017). The policy needs to be dynamic to provide direction yet broad in wording so that changes or accommodations can be made, so that institutions do not find themselves stuck (Atkins, 2010). The process should also include a few of the individuals who the policy is intended for, individuals external to the department that possess knowledge about the subject the policy is being made for, as well as individuals who initiated the policy making process (Burt & Schuh, 2017). Once the policy is created, there will be certain adjustments that must be made (Burt & Schuh, 2017). Routine assessment, and if necessary, adjustment of the policy should take place every 3 to 5 years to ensure the policy is still serving its initial purpose (Atkins, 2010).

Chapter 3

Methods

This study was conducted to understand how housing administrators in the college setting go about accommodating student requests for ESA's, who is involved in approving requests for ESA's, and the challenges administrators face in granting requests for ESA's specifically in campus housing facilities. The results of this study provide institutions with information that will assist in understanding this population better, as well as providing a guideline for institutions to follow as they are developing or updating their strategies and processes for approval of ESA's.

Design of Study

A qualitative approach was used to collect the data. Qualitative research refers to studies that investigate the quality of relationships, activities, or situations (Fraenkel, 2015). There are many different approaches to conducting research in a qualitative manner, and a phenomenological case study is best suited for this topic.

In phenomenological studies various reactions to or perceptions of a phenomenon are investigated to gain insight to best describe the participants reactions and perceptions (Fraenkel, 2015). The one assumption that lies within phenomenological studies is that there is a commonality to how certain experiences are perceived and interpreted otherwise known as the essence (Fraenkel, 2015). The essential characteristics, or essence, is the structure of the phenomenon that is studied (Fraenkel, 2015). The approval and accommodation process for ESA's within on campus housing is a recent phenomenon, and these processes are the essence to the phenomenon.

A case study examines a bounded system in depth utilizing multiple sources of data found at each setting (McMillan & Schumacher, 2010). Four housing professionals who are directly involved in the approval of ESA's were interviewed in addition to examining policies, processes, and strategies that each housing department offers in handouts, on their website, or any other additional resources. A semi-structured interview was utilized and was administered by the researcher to the housing professionals who assist with approving or denying emotional support animal requests, and who have agreed to participate in this interview. The interview consisted of structured open-ended questions but allowed for informal questions to provide more opportunities to gather more unsolicited information as well as to give participants an opportunity to bring up more relevant information.

According to Becker (1986), there are two purposes for a case study. The first is, "to arrive at a comprehensive understanding of the groups under study," and in this study it is to understand the process institutions, specifically housing professionals, go through in approving a student request for an ESA (Becker, 1986, p. 233). Becker states the second is to "develop general theoretical statements about regularities in social structure and process" and for this study it is understanding the policies and procedures and how they have come to be in place (p. 233). By interviewing those responsible within each department of residence life or housing from differing institutions that have an understanding of the process they have developed along with recommendations to assist the institutions who may be looking for more resources.

Site

Institutions selected were four-year public colleges who had established ESA protocols and policies. The interviews were administered over the phone. The participants signed a consent form, verbally consented, or electronically consented when scheduling their interviews via email.

Institution1 is a large suburban public research intensive university located in the Southeast with over 35,000 enrolled students and 8,500 students living on campus. Institution1 currently has 12 ESA's, and their ESA policy is less than a year old.

Institution2 is a large rural public comprehensive university located in the Southeast with over 19,000 students enrolled and over 4,700 students living on campus. Institution2 has 10 ESA's, and their policy is 4 years old.

Institution3 is a mid-sized rural public comprehensive university located in the Midwest with under 10,000 students enrolled and 1,200 students living on campus. Institution3 has 38 ESA's, and their ESA policy is 4 years old.

Institution4 is a large suburban public research intensive university located in the Northeast with over 28,000 students enrolled and 7,200 living on campus. Institution4 currently has 9 ESA's, and their policy is four years old and they have recently made changes to their policy.

Participants

All participants are senior level housing officials at their institution and had been at their institution for at least one year. Each participant will be named in the order they were interviewed, and their institution is named as such as well. For example, Participant1 is from Institution1.

Participant1, a female, is from the large suburban public research intensive university located in the Southeast. Participant1 is the Director of Administrative Services and Communication and works in the University Housing Department. She oversees four main areas: business and human resources, public relations and marketing, information technology, and assignments and contracts; these offices are all under university housing. Her specific department is composed of twenty-seven employees, and Participant1 has five direct reports.

Participant2, a male, is from a large rural public comprehensive university located in the Southeast. Participant2 is the Director of Business Administration with six direct reports. He oversees the assignment process, the main desk in the housing office, and a human resources coordinator.

Participant3, a female, is from a mid-sized rural public comprehensive university located in the Midwest. Participant3 is the Director of Housing and Residence Life, and she has four direct reports. She oversees the operations of the Housing and Residence life department, which includes graduate staff, student staff, and professional staff.

Participant4, a male, is from a large suburban public research intensive university located in the Northeast. Participant4 is the Executive Director of Housing and Residence Life and is responsible for the overall management of the housing department, business operations, and conference services. He has 3 direct reports.

Instrument

A qualitative semi-structured interview was utilized to gain information about the process to approve a student's request for an ESA, and when possible, how the institution developed that policy. Other questions asked what the challenges are with granting

approval for ESA's, what challenges ESA's pose in on campus housing facilities, and if the senior housing officer could change anything about the process, what would they change. A request for documents relevant to understanding the institutions process and history was asked but not required. And finally, a thorough review of the institutions web pages was conducted looking specifically at the housing information, but other areas (i.e. disability services) were only reviewed if necessary dependent upon the process outlined in the interview.

Data Collection

The data was collected through interviews administered over the phone. The phone interview was recorded using the program called TapeACall-Pro. The researcher reviewed the institutions website to identify what information is available to students in addition to asking for resources from each CHO from their respective institution regarding the ESA approval process. These resources included but are not limited to; handouts, websites, or campus handbook policies. Once all interviews have been completed, the interviews will be transcribed, and transcripts and resources will be coded appropriately.

Institution1 provided their Policy Regarding Service and Emotional Support Animals Access to [Institution1] Programs, Services, and Activities. Within this document are definitions of service animals, ESA's, handlers, partners, service animals in training, and pets. It outlines where each kind of animal is granted campus access, the responsibilities of the handlers, partners, and student ESA owners, and the federal guidelines Institution1 is operating under. They also provided the Housing Accommodation Request Form that the student completes at the Disability Resource

Center (DRO). The procedures, resident responsibilities, and animal health requirements specifically for ESA's were also provided.

Institution2 provided their special needs accommodations policy from the '17-'18 Residence Hall Community Guide as well as the Documentation Requirements for University Housing Form that the students complete at the DRO.

Institution3 provided the Disability Verification Form for an Emotional Support Animal Request that students fill out at the DRO, the ESA Intake form, the Service and Assistance Animal Guidelines Agreement form, and the email that is sent to all required staff upon approval. The ESA Intake form outlines the steps the student must complete if they wish to receive approval for their ESA on campus. The Service and Assistance Animal Guidelines Agreement form outlines the policies around service and assistance animals, the student's responsibilities for the service or ESA, and the health and safety requirements for the animals themselves.

Institution4 did not have access to the form the students fill out at the DRO, and none of their forms or policies were available online. When searched for on their website, students are instructed via the webpage to visit the DRO to begin the process.

Treatment of Data

The data from phone interviews was recorded using TapeACall-Pro, downloaded, and saved on to a password protected flash drive. The documents collected from each institution have had their names erased with white out, and have been renamed to match the participant number. For example, if a campus handbook policy is given from Participant1 from Institution1, the policy has been renamed "Campus Handbook Policy Institution I." All paper forms, including consent forms, collected have been kept in one

folder. When the folder is not in use, it was stored in a locked desk drawer in my apartment along with the flash drive. The data will be kept for three years, and then the flash drive wiped clean to erase completely all information.

Data and Resource Analysis

The data that has been collected has been transcribed and coded. The first cycle coding method that was utilized is structural coding. Structural coding is useful when there are multiple participants, semi-structured gathering protocols, and exploratory investigations (Saldaña, 2016). Structural coding is question-based coding that acts as a label or indexing device, and it is particularly useful for interview transcripts because it is able to quickly identify commonalities, differences, and relationships (Saldaña, 2016). The questions that have been used to help index the data are the research questions. The second cycle coding method that was utilized is process coding because it helps identify the steps in a process using gerunds as codes (Saldaña, 2016). It is useful for qualitative studies searching for routines or processes (Saldaña, 2016). The data has been reviewed by a thesis advisor to ensure accuracy with the data. From the codes, categories emerged, and these categories were able to be placed with themes (Saldaña, 2016). The resources that have been collected, such as pamphlets, website information, brochures, and or handouts have been looked at to see which category or theme certain bits of information can be placed in. These categories and themes have also been reviewed by a thesis advisor to ensure accuracy.

Chapter Summary

This researcher interviewed four housing professionals who are directly involved in approving ESA requests, who consented to participate in the interview, and who were from four year public institutions. Prior to the interview, each participant was asked to provide additional resources given to students regarding the ESA process. These resources could have been pamphlets, websites, department specific policies, and campus handbook policies. The semi-structured interview was administered over the phone. Each interview was recorded, downloaded, and stored on to a password protected flash drive. During the interview, CHOs were asked about the challenges that come with approving ESA's, challenges in campus housing facilities with ESA's, the culture regarding ESA's on their campus, who is involved in approving ESA requests, and what reasonable accommodations look like for ESA's on their respective campus. It is the hope that through this study other higher education institutions will be able to update or create their policy regarding ESA's, as well as streamline the process for approval for their students. This study also hopes to shed light on ways to better communicate with other departments involved in ESA approval to create a more inclusive and welcoming community for students with ESA's.

Chapter 4

Results

Participants were asked questions regarding their ESA policies at their respective institution and the common themes are outlined below. This chapter provides themes and connections between all four participants regarding the approval process for an ESA, the housing accommodations process for the ESA within on-campus residential spaces, and the challenges that accompany approval and accommodations for ESA's.

Offices

Each institution has a specific policy regarding the process to be approved to have an ESA within the student's residential living space, yet each institution's housing department does not keep the policy. The Disability Resource Office (DRO) on each campus is known as the policy keeper, as mentioned throughout some interviews, because each institution's approval process begins in the DRO. It is important to note that each institution called their DRO by a different name although they each provided the same services, and this name was selected for this study as a neutral term.

Each institution has developed its own process of approving ESA requests and some involved one or two offices, while others may involve more. These interviews were conducted with residence life and housing professionals and it is obvious that they and their offices are involved. However, each institution varies in what other offices are a part of the process.

Prior to the policies and process being put in place, students were starting in either the residence life office or the DRO seeking approval. Participant1 describes this by stating:

Just last year we had students running all over campus seeking approval for their animal and that is why we decided to create a uniform process. They need a uniform process because it provides better access to the accommodation, but it also helps us stay organized.

Other participants shared similar statements during their interviews regarding the lack of organization that accompanied not having a formal process.

Participant 1, whose policy is less than a year old, states, "Our policy that we created was kind of a joint venture between our Equal Opportunity Office, our Disability Resource Center on campus, University Housing, and Legal Services for that matter too." Participant 2 has multiple offices involved in their process, including "Legal Affairs, Student Disability Resource Center, Counseling Center, Residential Facilities, Institution 2 Dining, and Physical Plant." Physical Plant is its own separate department at Institution 2 and is responsible for all physical upkeep of the grounds and academic and residential buildings on campus.

The other two institutions each have only two offices involved in the process. Institution 3's two offices involved are the "Disability Resource Office and The Housing Department." Institution 4 is involved with the Accommodations Office and the Residence Life Department. The institutions all identified that housing and residence life along with disability services needed to be a part of this process.

Each institution has identified a location to begin the process and a person for which the process starts. This person will be referred to as the gate keeper. The gate keeper, which for all institutions is the professional in the Disability Resource Office and serves as the primary contact for students to start the ESA accommodation approval

process. Participant1 states, “even though it’s not covered by ADA, our institution has decided to use this office as the first level screening to verify that the needs are in accordance with how we defined what the procedures are.” Participant2 states that “students typically start at housing first, naturally, but then we send them to the DRO. The DRO then requires medical documentation to prevent students from turning in purchased registration letters.” Participant3 states, “if a student is interested in having an ESA, they start at our disability resources office to fill out the necessary paperwork and send in the documentation.” Participant4 also states that “students must start at the accommodations office to fill out the paperwork and provide the necessary documentation.”

Once all the paperwork is complete, the DRO notifies each institution’s housing department of approval or denial.

Emotional Support Animal Approval Process

Each party involved in the ESA approval process holds different roles and responsibilities regarding the approval steps within each institution’s process. Participants were asked questions about the approval process the students go through to have an ESA in an on-campus residential facility. All four institutions require their students who are requesting an ESA accommodation to register with the DRO on their campus prior to speaking with the housing office. In addition to starting at the disability resource office, all involved offices are notified of the approval and presence of an ESA in residential facilities at the conclusion of the process. Each institution has at the very least steps involved as part of the approval process, and these include university housing, the DRO, and the student.

Step 1: Emotional Support Animal Verification Forms. In the data collection process each participant was asked to share any documentation regarding their ESA policies and approval process. In addition to collecting and reviewing these documents, the websites were also visited and analyzed. Participants provided the form that students fill out at the DRO, the roommate agreement, and the email that is sent out to essential staff once the ESA is approved. Some institutions have their policies available on their website like Institution1, Institution2, and Institution4, while Institution3's is available upon request.

Institution1, Institution2, and Institution4 have their ESA policy uploaded online in a PDF to view or print through a link on their housing website. Within this document various definitions such as, service animal, handler, partner, service animals in training, Emotional Support Animal, and pet, are listed to help clarify confusion for students. Restrictions for access for ESA's and a clause regarding additional disabilities to animals are explained in this document, as well as what constitutes grounds for removal.

Institution1's conflicting disabilities clause states:

Some people may have allergic reactions to animals that are substantial enough to qualify as disabilities. [Institution1] will consider the needs of such persons as well as the needs of handlers and student ESA owners in meeting its obligations to reasonably accommodate all disabilities. Students requesting allergy accommodations should contact the Disability Resource Office in order to register and document this allergy. Employees who are not also students should submit their allergy documentation to Faculty Staff Relations. The Equal Opportunity

Director will facilitate a resolution when a resolution cannot be reached within the affected [Institution1] unit, program, or activity. (p. 5)

Participant2 works with their institution's Student Disability Resource Center (SDRC).

They state:

We provide the initial forms for the student to request the animal and certain forms are returned to us like roommate agreements, and veterinarian records. The DRO handles any additional communication with the treatment provider, and then communicates to us when the student is approved to have the animal in residence.

In addition to the DRO forms, Institution2 has the student and their roommate, if the student has one, fill out a roommate agreement. Participant2 states:

We have both roommates if the resident has a roommate fill out a roommate agreement because we find that it often prevents problems down the road. Most students are not going to facilitate that conversation themselves, so we help them set boundaries and have that conversation before the conflicts happen.

Institution2 also requests that copies of the veterinary records and a picture of the animal are given to the housing department for their records. These pictures can also be sent when notification is sent to necessary staff to identify the animal in the residential facility.

Institution3 does not have any of their resources or paperwork online. Participant3 explains why by stating:

I think its best to keep parts of the process offline because we have found that students who really have a need for an ESA will go to our office or the DRO to seek out what the steps are for the process. If we had the entire process online, we

would be fielding an excessive amount of requests for students who might want an ESA for the wrong reasons.

Institution4 has a link on their Accessible Housing webpage which takes the user to the *Documentation Standards for Housing Accommodations*. This document outlines the steps required to gain housing accommodations through their disability resource office. *The Licensed Professional Questionnaire* that is required and mentioned within the *Documentation Standards for Housing Accommodations* is attached within the link on Institution4's website as well. Once the forms are completed, the next step is for the student to visit the DRO.

Step 2: Disability Resource Office. The next step in the ESA Approval Process for each institution is for the student to verify and document their disability with the DRO at each respective institution. Participant1 states:

We are contacted by the student wanting an ESA and we refer them to the Disability Resource Office, and even though it is not covered by ADA, our campus has decided to use this office as the first level screening to verify that the needs are in accordance with how we defined our procedures.

Once the student has been approved by the DRO, their information is forwarded to ParticipantI so that her department can begin to coordinate the process to bring the animal into residential facilities.

Three institutions specifically spoke about how the student has to provide specific paperwork to the DRO as part of that first step. Participant3 shares:

If the students are interested in having an ESA, they start at our disability resource center and they talk with them and fill out the ESA intake form. If they're wanting

to have an ESA, they have to provide the documentation, and then it's approved by the DRO.

Participant4 states, "The students first contact our disability resource office and go through the process with them as far as delivering the appropriate documentation to receive approval." Participant2 describes this with a little more detail by stating:

The student must turn in medical documentation to the DRO outlining their need for the ESA and this is done to prevent students from purchasing or registering a pet as an ESA on one of the websites that exist for a fee."

Once the DRO has approved the verified students' documentation and request it is then submitted to the residence life department where the approval continues and the accommodation process begins.

Step 3: Approval Granted. It is important to note that the participants are not notified during the approval process until the approval is granted. The participants spoke about how after the DRO verified the students' information and request they were then sent the information to begin their portion of the approval process. Participant3 and Participant4 spoke about how they are notified when the student is approved by an email from the DRO.

Participant1 elaborates on the process by stating, "once the DRO grants the approval for an ESA, then that student's information would be forwarded including their name and approval, to my office. Then we start our procedures to allow the animal to come on campus." A member of Participant1's staff would meet with the student to go over the ESA Agreement Form and to explain the policies to them, which are also available online. The student then signs the agreement, and the Resident Assistant,

Complex Director, facilities staff, and DRO would be notified of the arrival and accommodation of the ESA.

Participant2 shares that his office also requires veterinary records and a photo of the animal be turned in for documentation purposes. Participant2 also shares:

Once the student is approved for an ESA from the DRO, the housing office is notified and we notify the Resident Director and Assistant Director of that area and our Facilities Leadership team in an effort to prevent harassment of the student by questioning whether the animal is legitimate.

Participant2 explained that his office also requires veterinary records a photo of the animal be turned in for documentation purposes.

The actual approval and communication process is further outlined in the next section.

Step 4: Housing Approval. Each institution that participated in this study had a specific process for approving ESA requests in the residence halls which began with approval by the DRO then a meeting with a housing professional where further information was covered and the student signed a form during this meeting.

Participants spoke about being notified by the DRO that the student has been approved to have an ESA on campus. Then participants shared that they would meet with the student to review the policies and expectations for having an ESA in a residential space at each respective institution. Participant3 outlines their process by stating:

Once we are notified from the DRO, then we meet, meaning me and the assistant director, will call the student and meet with them and talk with them about the expectations of the animal in housing and the student signs the [Service and Assistance Animal Guidelines and Agreement]. At this meeting is where we ask

more specifics about the type of animal and then we input this information in to our spreadsheet with information of all ESA's on campus.

Participant3 further describes her process by stating:

Technically it's me who approves them, however, I've delegated that to our assistant director, who will meet with the student prior to bringing the animal to campus. I have said that if it's anything other than a dog or a cat, I would like to be notified so that I can approve it. Part of the reason that we have it being me who approves the type of animal is so that it doesn't seem like we're approving all kinds of animals.

Participant 4 outlines their process by saying:

The DRO communicates with us that someone has all the approved paperwork with respect to having an ESA. We then meet with the student to review for a second time the expectations of having an ESA in the halls both in management of that ESA and the potential pitfalls they have for having an ESA in the hall, as well as unfortunately what could render the removal of that ESA from the hall.

After the rules and guidelines have been discussed, the student and Participant4 coordinate the arrival of the ESA into the residential space. Participants spoke about how after the student is informed of their responsibilities and the expectations in having an ESA on campus, and they sign an agreement form with the housing department which was shared by Participant3 above. Participant1 spoke about this saying:

The DRO grants approval and sends the student's information to us. We then start our procedures to allow the animal to come on campus. We share the ESA policy

with the student and have them sign the [ESA Agreement Form] that indicates that they understand what the policies are and who their emergency contact is.

Each individual interviewed spoke about the need to work with disability services as well as their staff in the approval and accommodation process.

Emotional Support Animal Housing Accommodations Process

Once a student was approved to have an ESA by the DRO and the residential life staff member, the participants talked about what they needed to do to make the accommodations in their facilities. There were several things that needed to be addressed in this process as described by the participants including where the student would live, who the student would live with and near, and notification of the staff in the specific facility. Accommodations ranged from providing a student with a single room with no roommate to alleviate the risk of allergies, to housing a student on the first floor for exterior access for the ESA. Staff needing to be informed included Resident Assistants (RAs) who live on the floor to facilities and grounds workers. An important step that all participants noted in the accommodations process is meeting with the senior housing officer regarding guidelines and expectations for care of animal, housing policies, and community standards.

Student Placement. The housing professional then works with the student to identify the most ideal location for residence along with coordinating their ESA's arrival in the space. They also identified that they may need to relocate to a different residential space due to a floor-mate or roommate's allergies or phobias, or to accommodate the student or the animal's needs. Participant2 describes this by saying "We have had one issue of a conflicting allergy and we worked with both students to determine who would

be responsible for moving.” All participants stated that they work with both parties, the student with the ESA and the roommate, in providing accommodations. Participant3 states “Some residents just don’t like animals and are concerned about their belongings and their space which is valid. We don’t ever make a student stay somewhere where they don’t feel comfortable.” Once an ESA is approved to be in a residential space, each participant meets with the student to review the guidelines and expectations of having an ESA within the residential space. Participant4 states:

We meet with the student to review for at least a second time the expectations of having an ESA in the halls both in management of that ESA, the challenges of having an ESA in the halls, and what justifies removal of the ESA from the halls.

Once the student understands the expectations of having an ESA in a residential space, staff in the specific facility are notified of the location of the ESA.

Staff Notification. Within residence life there are various staff who need to be notified and informed about the presence of an ESA in their community. Participants talked about how professional, administrative, and student staff are notified via email when an ESA is placed in their building so that the resident is not accused of breaking policies as well as to prevent multiple parties asking if the animal is allowed.

Professional and Student Staff Notification. In Residence Life departments there are multiple levels of staff members that also live and work in the residential space. The institutions selected for this study had similar organizational patterns that need to be explained here first. The first level is a Resident Assistant (RA) who is an undergraduate student who lives on the floor with the residents, and will have the most direct contact with the student. There is normally one per floor. The next level of staff are full time Hall

Directors (HD) who live in the building, and the HD supervises all of the RA's in that particular building. The third level of live in staff is a full time Area Director (AD) who lives in the same building or in the same complex. The AD supervises the HD's and the RA's as well.

Each participant had the same staffing structure as described above. Participant1 describes the process of staff notification by saying:

Not me directly, but my office, is responsible for the coordination on the housing side of the ESA approval. Once we receive the approved accommodation request, we document where that animal is going, alert that staff, alert the roommate that there will be an animal present, and get the student to sign the agreement form.

Each participant notified the RA responsible for the floor that the resident and ESA would live on, and the HD and AD who supervise that building and staff by email. Every RA who lives in the building was not notified via email, and it is unclear if they are notified by their supervisor in a staff meeting or otherwise. The email the staff receive regarding the approval of the ESA contains the type of animal, the resident's name and room number, and when the animal will be in the space.

Facilities and Plant Operations. Facilities and Plant Operations staff are notified by their supervisor regarding the presence of an ESA in a residential space that they frequently come in contact with. Similar to the residential staff notification, only employees who would be in direct contact with the animal are notified. Participants did not state if the same email format is utilized for facilities and plant operations staff.

Participant2 explains how they place a green sticker on the exterior door frame within the residence halls of students who have an ESA to notify their facilities staff and

emergency responders of the presence of an animal prior to entering the room.

Participant2 states:

It is actually for our facilities team and partially a safety concern. So if there were a fire in the building we know to identify those rooms as to having an animal within those spaces. It also helps facilities staff so if they enter a space with an animal they do not accuse the student of breaking the rules, and they can also enter the room without being 'surprised' by the presence of an animal.

Participants were very clear that only housing staff with a need to know basis such as the resident assistant, resident director, and area coordinator, or facility staff are notified of the animal's presence and what kind of animal it is.

Challenges in Granting ESA Approval

As a part of the interview, participants were asked to identify challenges they faced in accommodating students with ESA's, and they spoke about roommate conflicts, offices outside of the student affairs division, federal guidelines and regulations, care of animal, and student understanding. Three of the four participants spoke about challenges they face at their institution with ESA's. Participant1 stated that she was unable to speak on any challenges her institution faces with ESA's because their policy is less than one year old and she has not had enough experiences to fairly speak about challenges.

Facility Employee Understanding. Each participant is a senior housing officer at their respective institution. On a day to day basis they interact with their office staff and staff they supervise. Each institution's facility and plant operations department is a separate entity outside of residence life. Participants do not directly supervise the head of the department or the other facilities and plant operations employees. When an ESA is

approved and will be present in the residential space, each participant notifies the director of facilities or plant operations so that they can inform their employees who would be entering or come in contact with that residential space daily. Participant3 states:

Most facility workers do not understand why we allow these animals to live in our residence halls because most consider them to be pets because they don't understand how much anxiety or depression can affect a student's life and how a 'pet' can help them.

Participant2 also shares:

In an effort to prevent harassment of the student or inappropriately asked questions by facilities staff, we place a green sticker on the resident's door to indicate there is an animal. I think facilities respect and appreciate the sticker, but some of the staff still do not quite understand the difference between an ESA and a pet.

Federal Regulations. The Fair Housing Act (FHA) is what denotes a residence hall as a dwelling; therefore, that is why residential facilities must accommodate ESA's. This policy is often confused with the Americans with Disabilities Act (ADA) which only covers service animal accommodations, not ESA's. Participant4 states that "there is an unwinnable argument based off the law" when it comes to interpreting and implementing policies regarding accommodations and ESA's. Participant4 further elaborates by saying:

There's always going to be some outliers that challenge the nature of what you've created; to either where you have to adapt it or alleviate where the obstruction is and that is constant and ever evolving. In the last couple of years whether it be

accommodation based or policy based there's been a lot of need to have extensive conversations not only institutional but across the industry to make sure you put the most ethical and fair policies in place.

Participant3 shares:

I think what the law meant and what is being interpreted is getting away from the spirit of the law. I understand the purpose, and many people benefit from the FHA and the ADA, but the way the law is written is very ambiguous which leaves a lot of room for grey area.

Participant4 states that they have no role in the approval process because "it is an unwinnable battle based off of the law. I've asked that the accommodations office and the student services office be the primary contact for initiating the process."

Student Understanding. A hard challenge in the ESA accommodations process is student confusion among terminology used, such as service animal and Emotional Support Animal. Institution2 merged their service animal policy with their ESA policy to create their current policy known as the assistance animal policy. Institution2 refers to both service animals and ESA's as assistance animals. Participant2 stated that "we differentiate between what each animal's specific roles are within the policy, but the real challenge that we face is that students don't know the difference." Participant3 shares a similar experience by saying:

Students see a service dog and an ESA and assume or think they're the same thing. So when a student sees a service animal going to an event or into an academic setting, they think 'oh I can bring my ESA in here too' which is not the case and causes other issues on campus.

Care of Animal. Institution2 and Institution3 stated that another challenge is that some students might not realize how much work and time goes into caring for an animal. Participant3 stated “many students don’t realize how much work it is, even a cat, and the cat is probably the easiest one but how much work it is for a dog and taking care of the dog is a lot of work.” Participant2 states that most of their reports of ‘improper care of animal’ come from roommates or other residents on the floor and they have implemented a specific conduct process to handle these concerns. They treat the lack of care of animal as an extension of the resident so that the resident is learning from the process rather than receiving punitive charges. Participant2 elaborates by saying:

When I speak of care of the animal, it could be cleanliness or it could be that animal is just for lack of a better word obnoxious and barking all day where they are causing a disturbance to the environment and the community. We have to work through the scenario, and if it comes to a conduct meeting and violation we then document it accordingly.

Roommate Conflicts. Roommate conflicts are a common occurrence at each institution because most students do not request approval for an ESA until they are already enrolled and living in the residential space. Participant3 and Participant4 stated that roommate concerns are a frequent concern on their campus within the ESA process. Participant4 shares:

I have experienced where it’s not just dogs or cats that could cause roommate issues, but it’s lizards, spiders, and all kinds of animals. It can create anxiety for other students, and then you have a whole other thing you have to deal with.

Participant2 stated that his institution faces roommate conflicts as well.

The biggest challenge that we find is when both students have moved into the room and then the animal comes after the fact. Then it's identifying who is going to move and we essentially just work with them and say "here are your options." If neither one of them decides to move, we work with our legal affairs and student disability resource center to determine who's going to be responsible for moving because the disagreement with roommates can vary from care of the animal to just not wanting the animal around for fear of the animal or allergies.

Various challenges were presented by all participants at all stages of the approval and accommodations process.

Summary

Each participant outlined their process for approval and accommodations and challenges they face on their individual campus regarding ESA approval and accommodations. Each participant also talked about the challenges they face related to working with ESA's and some of the things they have learned and implemented through this process. A discussion of the findings will be presented in the next chapter.

Chapter 5

Discussion

This chapter will summarize the steps taken to approve and accommodate ESA's as well as recommendations for other institutions who are revising or creating ESA policies on their campus. Implications for residence life professionals, disability resource professionals, and federal guideline interpretations will be shared in providing accommodations for ESA's on a residential campus. The research questions used in this study are as follows:

1. What is involved in approving a request for an ESA?
2. How do administrators go about accommodating student requests for an ESA?
3. What challenges do administrators identify in granting students' requests for an ESA in campus housing facilities?

Discussion

Three research questions were used to guide this study. Throughout interviews multiple common themes presented themselves. Each participant spoke about an approval process, an accommodations process, and challenges they faced in both of these processes. The discussion is presented here.

Approval Process. All of the participants stated that the residence life office itself is not responsible for the approval of the ESA, nor are they responsible for the policy. Participants stated that the Disability Resource Office (DRO) is responsible for the policy because they are more familiar with federal compliance standards because of the other accommodations that they facilitate. The DRO is responsible for the approval of the ESA, which means the DRO handles the paperwork, communicating with other

officials on campus, and informing the student of approval. This means that the student turns in the medical verification documentation paperwork to the DRO professional, they verify and meet with the student, and issue or deny approval to the student. Participants stated that unless it was an unusual animal, such as a snake or insect, they did not hear about what type of animal it was until housing met with the student. From this point forward, the DRO notifies the respective senior housing official so that residence life can start coordinating the accommodations process. It was not stated by the participants if the DRO asked for the type of animal during the approval process.

The approval process for an ESA does not align with the original functionality and purpose of a DRO because it is not an academic accommodation (Evans et. al, 2017). All the participants spoke about how important it is for them to have a great working relationship with the Director of the DRO in order to coordinate the approval and accommodations process. The approval and accommodations process is a new area for the DRO because they are often unfamiliar with housing practices and accommodations (Broido et. al, 2017). This process has created a new opportunity for collaboration in order to better serve the student in their holistic development. It is imperative that residence life departments and DRO's have a strong collaborative working relationship in order to ensure a seamless process for the student. Each participant has a very similar approval process for their students who are requesting approval for an ESA. The DRO historically has served academically disadvantaged students who have been diagnosed with learning disorders, but now the lines are blurring between academic and social achievement (Kitzrow, 2003). The DRO must also have a base knowledge in mental health disorders and at times basic counseling skills in order to approve these requests.

Approval Process. All participants stated that prior to the policy and process being in place, students were being seen on a case by case basis and the process was not organized. Students would start in either office and student approval was not consistent. There was a strong need for collaboration between varying offices because each office is crucial to this process, but each office could not facilitate the entire process on its own. The DRO is responsible for the approval of the student's paperwork and approval for the ESA because they regularly handle federal compliance guidelines and are familiar with the language and protocol that accompanies federal accommodation processes. However, the DRO may not be familiar with all that is entailed in accommodating an ESA in a residential space, which is why the residence life department handles the accommodations process. Residence Life is responsible for notifying student and professional staff as well as emergency responders and facilities and operations staff.

Approval Paperwork. The first step in the approval process is to complete DRO registration paperwork and a medical verification form. Some participants stated that this paperwork could be found online while some participants stated the paperwork was only available in paper copies in their DRO. Some paperwork had definitions that explained the difference between a service animal and an ESA as well as all of the policies that surrounded an ESA while others did not. This can be quite helpful to the student seeking the support animal, and those who may be working with the student including therapists and doctors. Once the students have completed the registration intake and documentation forms at the DRO, the director of the DRO will meet with the student to assess if the need is legitimate. If the need is not legitimate, the director will deny approval to the student.

This is not communicated to residence life. If the need is legitimate, the director will approve the student and notify the senior housing official.

Residence Life's Role. Once the request is approved, the residence life professional coordinates their accommodations process with the student. Participants stated that they also meet with the student to review the expectations and guidelines that accompany ESA approval. The student is asked again to provide information about the type of animal they plan to bring for staff notification purposes but also to identify the kind of accommodation that is necessary. A dog needs external access or first floor placement while a cat does not necessarily need the same accommodations. Some participants require the resident with the ESA and their roommate, if they have one, to complete a roommate agreement prior to the arrival of the ESA. They stated that they found discussing what having an animal in a shared residential space entails as well as laying out boundaries in advance prevented a lot of roommate conflicts and mid-semester moves down the line.

Challenges. Student understanding is a challenge that all participants stated they faced during the approval and accommodation process. This challenge occurred throughout the various stages of the approval process and hindered or halted the entire approval process for ESA's. Students must overcome common misconceptions regarding mental health and institutional policies and practices (Kitzrow, 2003). Participants stated that students do not understand the difference between an ESA and a service animal. It becomes particularly challenging for students to understand the why behind the policy if they are unfamiliar with the language and guidelines surrounding ESA's.

Participants stated that some students would fill out the form for a service animal not knowing the difference between an ESA and a service animal. They would turn in the form and go through a separate process for a service animal approval until the DRO helps differentiate the difference with the student. The student must start the process all over again which is time consuming and frustrating for both parties involved. That is why forms that delineate the differences between a service animal and an ESA as well as the process for both are important in providing the students with clear information about what the process entails.

Accommodations Process. Participants in this study identified that once the student has been notified of the approval by the DRO for an ESA, their information is sent over to a senior housing official who is responsible for coordinating the accommodations in the residential setting. There are several things they identified in the process of making an accommodation. First, student housing staff meets with the specific student to go over the policies and responsibilities surrounding ESA's in a residential space. Some institutions require that a picture of the ESA and veterinary records are turned in during the initial meeting to be kept by the institution. All participants keep a record of what kind of animal and where the animal lives for every ESA on campus.

Second, they coordinate the accommodation by considering the student's current room assignment, additional allergy or phobia concerns from the roommate(s) and other residents in the community, and how the presence of the animal could affect the community. Participants shared how these considerations are ever present and change with each resident that enters and leaves the community throughout the academic year. It was stressed that one accommodation can create three more in its place and placement of

the animal and resident cannot be taken lightly. Participants spoke about how roommate concerns and conflicts are the biggest challenge they must handle. Some institutions have both parties residing in the same room sign a roommate agreement form to reduce the number of conflicts that occur throughout the semester.

The roommate agreement form is specific to roommates who share a space with an ESA. The senior housing official meets with both residents at the same time to discuss the most common scenarios that may occur, set up boundaries, and to teach them both to address unforeseen issues in a civil, respectful, and timely manner. Once these terms are discussed and a consensus has been reached, both roommates sign the form. Each roommate receives a copy and the appropriate residence life professional keeps a copy of the agreement as well.

Finally, required staff is notified including the resident assistant, complex director, and area coordinator, of the approval of the ESA. The type of animal, the room assignment, and the general policy the animal and resident must abide by are covered in the email sent to the appropriate staff members. Participants stated that they only notify staff who will come in contact the most so that the student is not consistently asked why they have a dog or cat in a residential space. None of the participants talked about any sort of training for student or professional staff regarding the presence of an ESA, just that they were notified. Training needs to be provided to all levels of staff regarding the federal guidelines, institutional responsibilities, and the resident's responsibilities so that the staff can better serve the student.

One participant shared how their staff places a green sticker on the door frame of each resident who has a service animal or ESA to notify facility and operations staff as

well as to notify emergency responders. The participant spoke about how this was questionable from a legality stand point, but that the institution has approved it because it keeps the resident and their animal safe in the event of an emergency and the sticker only has meaning to staff.

Decoster and Riker (2008) state that there are five levels of general objectives that build upon each other that all residence life departments should strive to meet in order to provide a satisfactory environment for residents to excel in. Each level builds upon the previous. If one level cannot be reached, the resident cannot progress forward to the other levels. Similarly, if one level is broken, the resident reverts back to the previous level. The first level is providing a satisfactory physical environment, the second level is maintaining the satisfactory physical environment, and the third is establishing structure and guidelines for communal living (Riker & Decoster, 2008). The fourth level is the development of an environment that promotes a conducive learning environment, and the fifth level is providing opportunities for individual growth and development (Riker & Decoster, 2008). All of these steps relate to at least one specific challenge that accompanies the presence of an ESA in a residential community.

Challenges. Similar to the approval process, the accommodations process also faces various challenges that affect multiple parties involved in the accommodations process. Most of these challenges result from the presence of an ESA and are not limited to only the mishandling of an ESA from the student or institution's approval and accommodation process.

Roommate Conflicts. Sharing a space with another person can breed conflicts, but when an ESA is also added to the space there can be a lot more conflicts. Students may

not communicate that they are working on getting approval for an ESA to their roommate which can be problematic if the resident is scared of animals or allergic to cats or dogs. Some institutions required both roommates to complete a roommate agreement prior to the animal's arrival in the shared space. The institutions that had both roommates complete an agreement found that there were fewer issues and concerns that were raised throughout the semester because it allowed both parties to set ground rules and common expectations. Institutions who did not have a roommate agreement stated that they have more issues with mid-semester moves and roommate conflicts between residential spaces where an ESA is present.

Providing a satisfactory physical environment is the first level of Decoster and Riker's (2008) theory. A satisfactory physical environment is not limited to a select group of students on campus. Each resident's space needs to be clean and safe (Riker & Decoster, 2008). A resident who shares a space with an individual who has an ESA could feel that now their safe and clean environment has been compromised and they have the right to also request an accommodation. That accommodation could be a room move or that the resident with the ESA must move. Regardless, the residence life office must balance both parties' needs and situation when accommodating ESA's.

Student Responsibility. A challenge that all participants described was the underestimation of responsibility that some students have regarding taking care of their ESA. One participant shared that a student left their ESA in their room over a weekend without taking the proper precautions to ensure they were able to be fed and exercised regularly. Another participant shared that she thinks most students are still learning how

to take care of themselves and manage their schedule and adding another living creature on to that is challenging and sometimes more stressful.

This challenge could throw off level 1 and level 2, which is maintaining the clean and safe environment (Riker & Decoster, 2008). The student with the ESA could live by themselves in a physical single, yet not take care of their animal properly leading to an unsanitary environment. During busy times, like mid-terms and finals, the animal might not be let outside to exercise or play as often as it should which is harmful to the animal as well as the resident. This could also cause problems for a roommate or other community members living near the student and ESA.

Facility and Operations Staff Understanding. Another challenge that participants spoke about was the understanding of facility and operations staff regarding the difference between an ESA, a service animal, and a pet. These employees are the ones that often times go into the student's space to clean or repair items, and they can be shocked to find an ESA in the space. One participant stated that sometimes their facility staff will confront the student about breaking the pet policy. This requires the residence life staff member coordinating the accommodation to make sure they are informing all necessary parties and that they are trained to understand what this means for the student.

Level 3 is establishing structure and guidelines for communal living (Riker & Decoster, 2008). Students usually view all employees in their residential environment as a residential department employee because they are unaware of the organizational structure or hierarchy. If a facility and operations staff member confronts the resident about breaking a policy even if they are not, the unspoken guidelines for communal living has been broken. It is important that residential employees share and educate the

differences regarding a pet and an ESA to all employees who might come in contact with the resident.

Federal Guidelines. An overarching challenge to all participants are the federal guidelines that outline what higher education institutions must do to accommodate ESA's. The Americans with Disabilities Act applies only to service animals. The Federal Housing Act provides a stipulation that on campus residential facilities are considered a dwelling which means that institutions must make accommodations for residents; however, it is not listed what is considered to be an accommodation (HUD, 1998). Case law has dictated that as long as there is a reasonable accommodation made the institution is in compliance with the law, yet students do not understand what a reasonable accommodation means (ACUHO-I, 2016). Students most often perceive an accommodation to be a list of demands that are to be met when that is not the case. Institutions are wary of straying too far from the spirit of the law because they do not want to be the next institution to create a case law. With so much gray area participants stated that they would rather be safe than sorry and approve most animals, aside from animals that pose immediate safety concerns, that come through lest they be challenged in court.

All of these challenges pose precarious situations to navigate as student affairs professionals, and thus certain outcomes will arise from these various challenges. What professionals learn through their various experiences helps them refine the policy from one year to the next. Professionals should evaluate their policies on a regular basis to make sure they are serving the students to the best of their ability. These implications will be discussed in the next section.

Implications for Student Affairs Professionals

Creating or revising an ESA policy creates many ripples in the pond of a higher education institution. Each one of the ripples will affect various offices and people differently which is why communication and collaboration between departments is key. How facilities and operations will be affected is not the same as how residence life staff will be affected. Even disability resource administrators will be affected differently. Nonetheless, it is important for each to meet regularly and to engage in open dialogues regarding the challenges they face and the solutions they create for those challenges.

Historically DRO's have only handled academic accommodations but now many disability resource administrators are finding that they must facilitate and help students navigate this process when they themselves might not be familiar with what happens after the approval occurs on the residence life side. Disability resource administrators need to have a good relationship with residence life professionals regarding the accommodations piece as well as to communicate about the challenges they might be facing.

This study has identified that DRO's are responsible for the execution and approval of the policy because they enforce federal guidelines and laws in an academic setting. However, ESA's are not able to be present anywhere except for a residential space which takes them out of the academic setting. Thus, the recommendation would be that the approval process becomes more of a collaboration between the DRO and residence life.

Traditionally Residence Life professionals have been in charge of community building, facility management, and policy enforcement to ensure safety and personal development within residential spaces. While they are still in charge of these aspects,

some new challenges regarding ESA's have been added into the mix. Below is a table that provides a side by side comparison of the old process and what the new process should include.

Table 1. Current Procedures and Recommended Procedures Comparison

Step	Current Procedures	Recommended Procedures
Step 1	Student completes paperwork in the DRO.	Student completes paperwork, including photos and veterinary records.
Step 2	Student meets with DRO.	Student meets with DRO and housing at the same time and receives all information about guidelines and expectations.
Step 3	Approval is granted.	Student meets with roommate and Residence Life designee to go over contract (if necessary).

Step 4	DRO informs Residence Life designated person of approval.	Residence Life designated person informs all housing staff who may interact with student and ESA.
Step 5	Student meets with Residence Life to review guidelines and expectations.	Approval is granted.
Step 6	Student signs agreement and expectations paperwork.	ESA enters residential space.
Step 7	Residence Life designated person informs all housing staff who may interact with student and ESA.	
Step 8	ESA enters residential space.	

Recommendations

A strong collaborative working relationship is essential to disability resource administrators and residence life professionals in order to make this process work

effectively and seamlessly to benefit the students. Each office has a specific role to play within this process. The DRO administrator is familiar with the legal implications and serves as a resource in understanding what needs to happen. Residence Life Professionals need to help Disability Resource Administrators understand how the presence of an ESA affects an entire community not just the roommates who reside in the space. Together the professionals and departments can work together so that the process stays efficient and seamless by reviewing every so often what other institutions do in terms of policies and processes. The paperwork that is provided to students to complete should also have clear definitions of all the language that is used throughout the process to be as transparent as possible and to avoid confusion. It should also be clear that is for ESA's and not service animals.

Once paperwork is submitted, the Residence Life professionals and DRO administrator meet with the student together and explain the legal policies as well as the expectations for the student in having the ESA on campus. Doing this together cuts out the need for the student to have two separate meetings that essentially cover similar information and show clear collaboration across campus. In some case the DRO and Residence Life were asking students to submit similar paperwork and in this joint meeting the paperwork can be shared and reviewed by both offices in a more efficient manner. If the student has a roommate, this initial meeting can be followed by the meeting with the roommate and the student to address the roommate contract. Then the approval can be granted.

Using the picture of the ESA submitted with the application the staff notification can be sent out. Students must also submit documentation each academic year for

renewal of ESA approval so that all departments are aware of what animals are still present in spaces and which ones have left with their owners. A specific conduct process for ESA mishandling should be created to create accountability and the process should be shared by both residence life and the DRO so that it creates consistency.

ESA policies also pose new challenges to all levels of staff in Residence Life. Student staff and professional staff need to be aware of how to approach a student with an ESA so as to not come off as intrusive into their personal and mental wellbeing. Training must be provided to all levels of staff in order to better serve the student. Senior Housing Officials must notify first responders and facility and operations staff regarding the presence of an ESA in a residential space so they also do not intrude on a student's personal life. This involves communication and collaboration with directors within those departments to ensure training and open dialogues are taking place regarding ESA policies.

Future Research

Future research should be conducted with the following recommendations in mind.

- Conduct the study with more participants from varying types of institutions, such as small private or large research institutions, in order to see how governance affects policy writing and interpretation.
- Replicate this study with questions specific to the housing accommodations process. Questions focused on challenges in the accommodations process and how the policy was created, but there were not any questions regarding the steps that are taken to execute the accommodations process in residence life.

- Interview students who have ESA's regarding their interpretation and understanding of the policies, language, and process that they have undergone.
- Conduct the same study with Disability Resource Administrators.
- Conduct the same study with mental health professionals ie: counselors, psychologists, and psychiatrists.

Summary

The current study was conducted with a qualitative case study approach to determine the best practices of ESA policies in a residential life environment. The research found that Disability Resource Offices are responsible for the policy or facilitate the approval process for ESA's on campus while Residence Life facilitates the accommodations process. These two processes should be blended so that it creates a stronger and more collaborative relationship and so that the student does not have to go through two processes. There are numerous challenges that Residence Life Professionals and Disability Resource Administrators face in facilitating the approval and accommodation process, but clear language, transparency, and open communication between all parties involved is key to creating solutions to those problems. It is very important that all parties who are involved and affected by both processes keep an open line of communication to keep overcoming challenges.

References

- ADA. (2016). *Americans with Disability Act of 1990, as amended*. Retrieved from:
<https://www.ada.gov/pubs/adastatute08.pdf>.
- Barlow, D. H. (Ed.) (2008). *Clinical handbook of psychological disorders a step by step treatment manual*. (4th ed.). New York: The Guilford Press.
- Bauman, M., Davidson, D. L., Sachs, M. C., & Kotarski, T. (2013). Service, comfort, or emotional support? the evolution of disability law and campus housing. *The Journal of College and University Student Housing*, 40(1), 143-156. Retrieved from: <http://ebscohost.com>.
- Bellenir, K. (Ed.). (2005). *Mental health disorders sourcebook*. Detroit: Omnigraphics
- Becker, H. S. (1986). *Writing for social scientists*. Chicago: University of Chicago Press.
- Bishop, J. B. (2006). *College and university counseling centers: questions in search of answers*. *Journal of College Counseling*, 9, 6-19.
- Brennan, J., & Nguyen, V. (2016). *Service animals and emotional support animals*. Retrieved from: <https://adata.org/publication/service-animals-booklet>.
- Burt, B. A., & Schuh, J. H. (2017). Strategic planning and finance in student affairs. In J. Schuh, S. Jones, & V. Torres (Eds.). *Student services a handbook for the profession* (pp. 308-314). San Francisco: Jossey-Bass.
- Center for Collegiate Mental Health 2015 Annual Report. (2015). Penn State University.
- Dermott, J. (2016). Update on accommodating service and assistance animals on campus: making heads or tails of federal disability laws. Retrieved from:
<http://counsel.cua.edu/fedlaw/nacuanoteserviceanimalsupdate.cfm>.

- Diagnostic and Statistical Manual of Mental Disorders Fifth Edition DSM-V.* (2013).
Arlington, Virginia: American Psychiatric Association.
- Eisenberg, D., Golberstein, E., & Gollust, S. E. (2007). Help-seeking and access to mental health care in a university student population. *Medical care*, 45(7), 594-601. Retrieved from <http://jstor.org>.
- Ensminger, J., & Breitkopf, F. (2009). Service and support animals in housing law. *GPSolo*, 26(5), 48-53. Retrieved from: <http://ebscohost.com>.
- Evans, N. J., Broido, E. M., Brown, K. R., & Wilke, A. K. (2017). *Disability in higher education a social justice approach*. San Francisco: Jossey-Bass.
- Fitzgerald, B. & Hobgood, K. (2016). Accommodating Assistance Animals. *ACUHO-I*. Retrieved from: <http://www.acuho-i.org/resources/cid/5983?portalid=0?portalid=0>.
- FHA. (2016). *Fair Housing Act design manual*. Retrieved from: <https://www.huduser.gov/portal/publications/PDF/FAIRHOUSING/fairfull.pdf>.
- Fraenkel. (2015). *Research methods for college student affairs*. United States of America: McGraw Hill Education.
- Fundukian, L. J, & Wilson, J. (Eds.). *The Gale Encyclopedia of Mental Health* (2nd ed.). Detroit: Thomson Gale.
- Gallagher, R. (2004). *National Survey of Counseling Center Directors*, Alexandria, VA, The International Association of Counseling Services.
- Gibson, J. (2006). Disability and clinical competency: an introduction. *The California Psychologist*, 5-8.

- Hunt, J. B., & Watkins, D., & Eisenberg, D. (2012). How do college campuses make decisions about allocating resources for student mental health?: Findings from key participant interviews. *Journal of College Student Development*, (53)6, 850-856.
- Kitzrow, M. A. (2003). The mental health needs of today's college students: challenges and recommendations. *NASPA Journal*, (41)1, 167-181.
- Kitzrow, M. A. (2009). The mental health needs of today's college students: challenges and recommendations. *NASPA Journal*, (46)4, 646-660.
- Kogan, L. R., Schaefer, K., Erdman, P., & Schoenfeld-Tacher, R. (2016). University counseling centers' perceptions and experiences pertaining to emotional support animals. *The Journal of College Student Psychotherapy*, 30(4), 268-283.
Retrieved from: <http://ebSCOhost.com>.
- Lehman, J., & Phelps, S. (Eds.).(2005). *West's Encyclopedia of American Law* (2nd ed.). Detroit: Gale.
- Merriam, S. B. (1998). *Qualitative research and case study applications in education*. San Francisco: Jossey-Bass Publishers.
- McMillan, J. H., & Schumacher, S. (2010). *Research in education evidence based inquiry*. (7th Edition). New Jersey: Pearson.
- Mental Health America. (2016). *The state of mental health in America*. Retrieved from: <http://www.mentalhealthamerica.net/issues/state-mental-health-america>.
- National Alliance on Mental Illness. (2016). *Mental health conditions*. Retrieved from: <https://www.nami.org/Learn-More/Mental-Health-Conditions>.
- National Center for Educational Statistics. (2016). *Back to school statistics*. Retrieved from: <https://nces.ed.gov/fastfacts/display.asp?id=372>.

- Patton, L. R., Renn, K. A., Guido, F. M., & Quaye, S. J. (2016). *Student development in college theory, research, and practice* (3rd Ed.). San Francisco, California: Jossey-Bass.
- Reynolds, A. L. (2017). Counseling and helping skills. In S. R. Jones, J. H. Schuh, & V. Torres (Eds.), *Student services a handbook for the profession* (pp. 452-465). San Francisco: Jossey Bass.
- Rhodan, M. (2016). *Why college is a risky time for students' mental health*. TIME.
Retrieved from: <http://time.com/4473575/college-mental-health-guidebook/>.
- Riker, H. C., & Decoster, D. A. (2008). The educational role in college student housing. *Journal of College and University Student Housing*, (35)2, 80-85.
- Rumrill, P.D., & Gordon, S. (1992). Complying with the employment accommodations provisions of the Americans with Disabilities Act: Higher education administrators as employers of people with disabilities. *NASPA Disability Concerns Network Newsletter*, 1(1), 1-2.
- Rumrill, P. D., Gordon, E.S., & Roessler, R. T. (1993). Title I of the Americans with Disabilities Act. *NASPA Journal*, (30)3, 225-229.
- Saldaña, J. (2016). *The coding manual for qualitative researchers*. (3rd edition). Los Angeles: Sage.
- Salzer, M. S. (2012). A Comparative study of campus experiences of college students with mental illnesses versus a general college sample. *Journal of American College Health*, (60)1, 1-7.

- Soet, J., & Sevig, T. (2006). Mental health issues facing a diverse sample of college students: results from the college student mental health survey. *NASPA Journal*, (46)3, pp. 410-431.
- Taylor, J. S. (2016). Colleges see an uptick in requests for emotional support animals on campus. *American Bar Association Journal*, 7. Retrieved from: <http://ebscohost.com>.
- United States of America vs. University of Nebraska at Kearny, U.S.C. 80. (2013).
- United States Census Bureau. (2017). U.S. Census report 2010. Retrieved from: <https://www.census.gov/2010census/data/>.
- United States Department of Health and Human Services. (2016). Adolescent mental health disorders. Retrieved from: <https://www.hhs.gov/ash/oah/adolescent-development/mental-health/mental-health-disorders/index.html>.
- United States Department of Labor. (2016). *Section 504, Rehabilitation Act of 1973*. Retrieved from: <https://www.dol.gov/oasam/regs/statutes/sec504.htm>.
- United States Department of Veterans Affairs. (2016). *PTSD overview*. Retrieved from: <https://www.ptsd.va.gov/public/ptsd-overview/basics/how-common-is-ptsd.asp>.
- Wang, J. (2007). Mental health treatment dropout and its correlates in a general population sample. *Medical Care*, (45)3, pp. 224-229.
- Younggren, J. N., Boisvert, J. A., & Boness, C. L. (2016). Examining emotional support animals and role conflicts in professional psychology. *Professional Psychology: Research and Practice*, (47)4, 255-260.

Appendix

Qualitative Interview Questions

1. Do you consent to participate in this interview?
2. What is your title?
 - a. Tell me a little bit about your career path, and how you got to where you are now.
 - b. What are your responsibilities in this role?
 - c. Tell me about the staffing structure in your department.
 - i. How many direct reports do you have?
 - ii. How are your residence halls staffed?
 - d. What do I need to know about your department?
3. Tell me about the on-campus population.
 - a. How many students are at the institution?
 - b. How many students live on campus?
 - c. How would you describe the student population?
4. In your career with housing and residence life what policies have you found the most challenging with regard to providing students with a safe, secure, and positive environment that supports their academic success?
 - a. Tell me about these policies.
 - b. How have you overcome these challenges?
 - c. What did you learn from these experiences?
5. Tell me about your understanding of what an Emotional Support Animal is.
6. Have you had students request to have an ESA on campus?
 - a. What is your role in the approval process for an ESA?
7. Tell me about your policy regarding ESA's on campus.
 - a. If they have one, Tell me about the process of creating this policy.
 - i. Tell me about your understanding of this policy.
 - ii. What is your role in this process of developing the policy?
 - b. If they do not have one, are you currently working on developing one?
 - i. What steps have you taken so far?
 - ii. What specific things would you like to see in the final policy?
 - iii. What challenges are you facing in developing this policy?
8. What departments on campus do you work with in approving ESA's for students living on campus?
 - a. Tell me about the ways you work together.
 - b. Are there other departments that you should be working with regarding the approval and support the students with ESA's?
 - c. How would you describe these collaborations?
 - d. Who in your department do you need to communicate this with internally?
9. How would you describe the climate on campus surrounding ESA's?
 - a. Have you had any issues with ESA's and damages in residence halls?

- b. Have you had any issues in general with ESA's?
- 10. What kind of ESA's do you typically receive requests for?
- 11. What recommendations would you make to other CHO's in developing a policy/process for accommodating student requests for ESA's?
- 12. Is there anything else you would like me to know?