



Defense Health Agency

PROCEDURAL INSTRUCTION

NUMBER 6025.18
May 21, 2019

DHA AD, CS

SUBJECT: Animal Access to Facilities

References: See Enclosure 1.

1. PURPOSE. This Defense Health Agency-Procedural Instruction (DHA-PI), based on the authority of References (a) and (b), and in accordance with the guidance of References (c) through (p), establishes the Defense Health Agency's (DHA) procedures to provide guidance for Animal Access to the DHA Facilities, to include warrior transition and rehabilitation facilities, encompassing service animals, Military Working Animals, and animals used in Animal-Assisted Therapies (AATs) and Animal-Assisted Activities (AAAs).
2. APPLICABILITY. This DHA-PI applies to DHA Facilities, and Services.
3. POLICY IMPLEMENTATION. It is DHA's instruction, pursuant to References (d) through (i), that Animal Access to DHA Facilities will be implemented per the procedures outlined in this DHA-PI.
4. RESPONSIBILITIES. See Enclosure 2.
5. PROCEDURES. Service animals may accompany patients and visitors in DHA facilities, to include warrior transition and rehabilitation facilities and may access hospitals, treatment facilities, recreation facilities, barracks, and other structures as long as such access does not compromise public health and safety. Animals engaging in AATs and AAAs may enter DHA facilities, warrior transition and rehabilitation facilities, treatment facilities and recreation facilities only as part of a program approved by the facility commander/director and retains the right to refuse or limit any such program. DoD-owned animals (i.e., Military Working Dog, lab animals), and other government-owned animals will be allowed access to DHA facilities for medical and ancillary services to include but not limited to diagnostic imaging, laboratory, pharmacy, morgue, and other specialized services, as needed (see Enclosure 3).

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6. RELEASABILITY. **Cleared for public release.** This DHA-PI is available on the Internet from the Health.mil site at: www.health.mil/DHAPublications.

7. EFFECTIVE DATE. This DHA-PI:

a. Is effective upon signature.

b. Will expire 10 years from the date of signature if it has not been reissued or cancelled before this date in accordance with DHA-Procedural Instruction 5025.01 (Reference (c)).



R. C. BONO
VADM, MC, USN
Director

Enclosures

1. References
2. Responsibilities
3. Procedures

Glossary

ENCLOSURE 1

REFERENCES

- (a) DoD Directive 5136.01, “Assistant Secretary of Defense for Health Affairs (ASD(HA)),” September 30, 2013, as amended
- (b) DoD Directive 5136.13, “Defense Health Agency (DHA),” September 30, 2013
- (c) DHA-Procedural Instruction 5025.01, “Publication System,” August 24, 2018
- (d) Technical Bulletin Medical 4, “DoD Human-Animal Bond Program Principles and Guidelines,” August 3, 2015
- (e) Army Regulation 40-905, “Veterinary Health Services,” August 16, 1994
- (f) Public Law 101-336, “The Americans with Disabilities Act of 1990,” amended by Pub Law No 110-325, and codified at 42 U.S.C. ch. 126 and 47 U.S.C ch. 5, January 1, 2009
- (g) Public Law 93–112, 87 Stat. 355, “The Rehabilitation Act of 1973,” September 26, 1973
- (h) Navy Judge Advocate General, The Advisor, “Service and support Animals on Military Installations,” December 2015
- (i) DoD Instruction 1300.27, “Guidance on the Use of Service Dogs by Service Members,” January 7, 2016
- (j) Army Regulation 690–12, “Civilian Personnel Equal Employment Opportunity and Diversity,” December 22, 2016, as amended
- (k) American Hippotherapy Association¹
- (l) Field Manual 4-02.51, “Combat and Operational Stress Control,” July 6, 2006
- (m) Delta Society, Delta Society Newsletter, 4(1) 1-2, “Recognizing and Managing Stress,” 1992²
- (n) Army Regulation 700-81, “DoD Military Working Dog (MWD) Program,” December 1, 1990
- (o) DoD 5400.11-R, “Department of Defense Privacy Program,” May 14, 2007, as amended
- (p) DoD Manual 6025.18, “DoD Health Information Privacy Regulation,” March 13, 2019

¹ This reference can be found at www.americanhippotherapyassociation.org, via e-mail at: info@theahainc.org, or by calling (970) 818-1322.

² This reference can be found at www.deltasociety.org, via e-mail directly through the website, or by calling (425) 679-5500.

ENCLOSURE 2

RESPONSIBILITIES

1. DHA FACILITY COMMANDER/DIRECTOR. DHA Facility Commander/Director will:

a. Ensure installation veterinary services are informed and consulted on all ongoing or proposed Human Animal Bond (HAB) programs at least annually or upon program changes. Consult with installation veterinary services to ensure health and welfare standards in paragraph 2 are being met.

b. Develop plans and policies to facilitate access for all beneficiaries, visitors, and employees with service animals. Policies should, at a minimum establish:

(1) Standards for verifying, when appropriate, the status of a potential service animal by asking only two questions: (a) "Is the service animal required because of a disability?" and (b) "What work, or task has the animal been trained to perform?" Any personally identifiable and disability information collected, maintained, and/or stored pursuant to this instruction will be safeguarded in accordance with References (o) and (p), as applicable.

(2) Standards for service animal access, ensuring a service animal can accompany the handler or alternate handler to areas the general public is permitted access, subject to the same rules as the general public, and where the presence of a service animal would not compromise patient care and safety, or infection prevention and control standards. Restricted areas should include the following:

(a) Operating rooms and surgical suites.

(b) Areas where invasive procedures are being performed.

(c) Acute inpatient hospital settings when the presence of the service animal is not part of a documented treatment plan.

(d) Decontamination, sterile processing, and sterile storage area.

(e) Food preparation areas (not to include public food service areas).

(f) Any areas where personal protective clothing must be worn, or barrier protective measures must be taken to enter.

(g) Any other area the Director deems necessary to ensure the health, welfare, and safety of patients and staff.

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(3) Standards for removal of an animal from a DHA facility based on the animal's behavior, health, or safety concerns. Qualified DHA facility staff can assess, based on objective indications, to determine if an animal poses a health or safety risk. Examples of such indications include aggressive behavior, running in the facility, excessive barking, jumping on individuals/furniture, inappropriate urinating/defecating in the facility, and signs of disease or poor health.

(4) Procedures to ensure access to care for patients with service animals whose service animal has been removed from the DHA facility.

(5) Procedures for federal employees who request a reasonable accommodation for a service animal, which can be submitted to the Equal Employment Opportunity Office or Disability Program Manager.

(6) Has authority to grant exceptions to this policy on a case by case basis, with the proviso that any animal granted permission must abide by all rules and regulations within this DHA-PI.

c. Determine the necessity for use of AAT/AAA programs within the DHA facility and consult with installation veterinary services to develop plans, policies, and guidance prior to implementation. These programs should be reviewed annually, and at a minimum:

(1) Mandate validation of certification of animal handlers and animals, as applicable and address the specific accreditation/certifications required from national organizations, if applicable.

(2) Annually address animal health requirements, immunization requirements, and certification, as well as guidance on reasonable precautions to ensure an animal's behavior and health are appropriate.

(3) Establish the responsibilities of animal handlers such as providing for the animals' cleanliness, immunizations, restraint, waste removal, liability insurance, identification (handler and animal), training, release of liability, and any other requirements to assure the safety of patients, staff, and animals.

(4) Establish policies and procedures for command sanctioned AAT/AAA programs external to the DHA facility such as Hippotherapy.

(5). Establish standards for AAT/AAA animals. At a minimum, dogs employed in such programs should consistently obey the following five commands: "Come," "Down," "Sit," "Stay," and "Leave it." Additional suggested training and health standards for AAT/AAA animals are outlined in Reference (d).

d. Establish mandatory employee training for all DHA facility employees, military or civilian, regarding standards of service animal verification, access to facilities, access to patients, removal of animals from facility by qualified staff, animals in training, reasonable

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accommodation, who to contact in case of questions, facility level policies, and this DHA-PI. Conduct training as part of initial in-processing and annually thereafter.

2. U.S. ARMY VETERINARY SERVICE/INSTALLATION VETERINARY SERVICES.

U.S. Army Veterinary Service/Installation Veterinary Services will review animal records, at no charge, to verify that a physical exam, vaccines, anti-parasitides, anti-flea and tick medications are administered as directed, and fecal float (negative) have been performed for each animal at least once a year and when health concerns arise. Installation veterinary services may provide other services on a limited basis to support the HAB program on their installation. Installation veterinary services will advise the DHA commander/director on the health and welfare standards for service dogs and animals involved in AAT/AAA as detailed in References (d) and (e)).

3. BENEFICIARIES AND HANDLERS. Beneficiaries and Handlers will:

- a. Abide by all policies and guidelines set forth by DHA facility commander/director.
- b. Will be given a copy of the facility policy upon registration of animal.
- c. To the extent permitted by law, will maintain responsibility and liability for any damages or injuries caused by their animals unless said handler is acting within the scope of a DHA program; (i.e., a DHA facility occupational therapy program).

ENCLOSURE 3

PROCEDURES

1. BACKGROUND

a. Service Animals. Are individually trained to do work or perform tasks for the benefit of an individual with a physical or mental disability. Animals that are “in training” or whose sole function is to provide emotional support, comfort, therapy, or companionship are not service animals under the ADA. The label, and therefore corresponding privileges, only applies to those animals conforming to the standards and requirements delineated by the Americans with Disabilities Act (ADA) (e.g., guide animals that assist individuals with visual impairment). These animals remain in possession of the Service member or beneficiary. The ADA only recognizes dogs and miniature horses as service animals.

b. Therapy Animals. Animals utilized in AAT (e.g., a horse used in equine therapy as part of a treatment process designed by an occupational therapist (OT) to improve balance). These animals remain within the possession of therapists, providers, or third-party owners.

c. Activity Animals. Animals utilized in AAA (e.g., a well-mannered dog brought by a Red Cross Volunteer to brighten the lives of people in a waiting room.) These animals remain within the possession of therapists, providers, or third-party owners.

d. Skilled companion animals, emotional support animals, and companion animals. Animals that do not meet the definition of a 'service dog', yet remain in the possession of a beneficiary are defined as pets and therefore do not receive access or privileges granted to service dogs, therapy animals, or activity animals.

e. Handler. Handlers are qualified persons for whom a service animal does work or performs tasks, or persons with primary responsibility and control of an animal utilized in an AAT/AAA program.

2. ANIMAL PRESENCE WITHIN DHA FACILITIES

a. It is the sole responsibility of owners or handlers to ensure their service animals receive adequate veterinary care and provide care and stewardship , to include feeding, watering, exercising, toileting, and waste removal.

b. Service animals may have access to DHA facilities as long as such access does not compromise public health and safety and does not interfere with principles of good order and discipline. Animals engaging in AAT/AAA may enter DHA facilities only as part of a program approved by DHA facility commanders/directors and retain the right to refuse or limit any such programs.

c. Authorized animals will remain under the direct control of the owner/handler at all times. A service animal must have a harness, leash, or other tether, unless the handler's disability prevents use of such controls or their use would interfere with the service animal's safe, effective performance of work or tasks. In this case, the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means). If the owner/handler must enter a DHA facility where the health of other patients might be compromised by the animal's presence or where service animals are otherwise unauthorized, another capable person may be designated to care for a service animal.

d. In order for a person accompanied by a service animal to visit a patient within a DHA facility, the ward staff, patient, and any roommate(s), must all grant permission for the animal to enter the patient's room. Ward staff should only base an objection grounded on clinical/medical concerns for a patient's welfare. Should a roommate object, alternative visiting arrangements will be offered as appropriate.

e. DHA facility personnel may make two inquiries to determine whether an animal qualifies as a service animal:

(1) "Is the dog a service animal required because of a disability?" and

(2) "What work, or task has the dog been trained to perform?" ADA states that these are the only questions that may be asked of an individual with a potential service animal.

f. Service animals in training may be granted, at the discretion of the local DHA facility commander/director, access to DHA facilities provided the training conforms to the requirements delineated in this DHA-PI. For medically supervised training programs wherein the trainer benefits from the act of training animals for service for other individuals, access to DHA facilities will be granted at the discretion of the DHA facility commander/director."

g. DoD-owned animals (i.e., Military Working Dog, lab animals), and other government-owned animals will be allowed access to DHA facilities for medical and ancillary services to include but not limited to diagnostic imaging, laboratory, pharmacy, morgue, and other specialized services, as needed.

3. TRAINING AND CERTIFICATION OF ANIMALS AND PROGRAMS

a. Service Animals. The DHA requires service animals for Service Members be trained by entities recognized by the Department of Veterans Affairs. For Service Members, registration of pets through any source not recognized by the Department of Veterans Affairs does not qualify the pet as a service animal. This requirement does not apply to service animals for employees, eligible beneficiaries, or other non-DoD visitors.

b. AAT/AAA Programs. Until standards are published, the installation veterinary services will maintain the certification for animals utilized in AAT/AAA programs as outlined in

Reference (d). All animals utilized in AAT/AAA must have a primary handler, trained and certified by the same organization certifying the animal.

GLOSSARYPART I. ABBREVIATIONS AND ACRONYMS

AAA	Animal-Assisted Activity
AAT	Animal-Assisted Therapy
ADA	Americans with Disabilities Act
DHA	Defense Health Agency
DHA-PI	Defense Health Agency-Procedural Instruction
OT	Occupational Therapist
PT	Physical Therapist

PART II. DEFINITIONS

These terms and their definitions are for the purposes of this DHA-PI.

AAA. Provide opportunities for motivation, education, or recreation to enhance quality of life. The activities are delivered in various environments by specially trained professionals, paraprofessionals, and volunteers in association with animals that meet specific criteria, such as having been trained to retrieve objects. Included are “meet and greet” activities involving pets and their handlers visiting people on a scheduled or spontaneous basis, as well as programs permitting family members or friends of facility residents to bring their own pet or the resident's pet for a visit. The same activity may be repeated with many individuals or be conducted in groups. Unlike therapy programs, these are not tailored to a particular person or medical condition. Visit content is spontaneous, and visits are as long or as short as necessary.

AAT. A goal-directed intervention in which an animal meeting specific criteria is an integral part of the treatment process. These programs are usually directed and delivered by human health or human services professionals with specialized expertise and within the scope of practice of their profession. AAT is designed to improve human physical, social, emotional, and cognitive (e.g., thinking and intellectual skills), function, and animals may be formally included in activities such as physical, occupational, or speech therapy. Therapy programs are provided in a variety of settings and may involve individuals or groups. In AAT, specified goals and objectives are determined for each patient, and each patient's progress is evaluated and documented.

American Assisted Intervention. A broad term that includes what is traditionally known as “AAT” or “AAA.”

Companion/Skilled companion animal. Not legally defined; accepted as another term for “pet.” emotional support animal fall under companion animal or pet.

DoD-owned animal. Animals that are owned by the DoD and authorized care by Army Veterinary Services. These include, but are not limited to: military working animals; authorized unit mascots; animals supported through appropriated and non-appropriated funds; stray animals on military installations in a DoD operated stray facility for the first 5 calendar days; animals used in biomedical research, education, training, and testing; and wild animals in confinement on military installations, such as deer (see also “military working animals”).

Government-owned animal. Government-owned animals include animals owned by the DoD and animals owned by other Federal agencies when existing agreements exist for the provision of care to these animals by the Army.

HAB program(s). Programs involving interactions between people and animals, their attachments, and the significance of the HAB in people’s mental, social, and physical health. HAB programs include AAA and AAT.

Hippotherapy. Programs involving the use of a horse’s movement as a treatment strategy by physical therapists (PTs), OTs, and speech/language pathologists to address impairments, functional limitations and disabilities in patients with neuromotor and sensory dysfunction. This treatment strategy is used as part of an integrated treatment program to achieve functional goals.

Military working animal. Animals that are owned by DoD, have a specific military mission, are considered active duty Service members for the purposes of medical care and support while on active duty. They include, but are not limited to, military working dogs, military working equids, and marine mammals.

OT. A licensed healthcare professional who employs the therapeutic use of everyday activities (occupations) to help patients participate in the activities they want and need to do. Common occupational therapy interventions include helping children with disabilities to participate fully in school and social situations, helping people recovering from injury to regain skills, and providing supports for older adults experiencing physical and cognitive changes.

PT. A licensed healthcare professional who helps patients reduce pain and either improve or restore mobility, without surgery in most cases, and often resulting in reduced long-term use of prescription medication(s). PTs can teach patients how to prevent or manage their condition to achieve long-term health benefits. After examining the patient, a PT develops a plan incorporating treatment technique to promote the patient’s ability to move, reduce pain, restore function, and prevent disability. A PT also works with patients to prevent mobility loss by developing fitness-and wellness-oriented programs that will enable a healthier, more active lifestyle.

Service animals. In accordance with Reference (f), the ADA uses animals individually trained to do work or perform tasks for people with disabilities: (i.e., Service Dog): a dog obtained from

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

Therapy animals. Not legally defined by federal law. Often these are animals that did not complete service animal or service dog training due to their health, disposition, trainability, or other factors but are made available as pets for people who have disabilities. These animals might or might not meet the definition of service animals.