Service Dogs in the Chemistry Laboratory: Some Considerations

Obviously a service dog....
According to the ADA:

- A service dog must be individually trained to perform a task specifically related to its partner’s disability.
- Its partner may have a physical, intellectual, psychiatric, or sensory disability.
- The dog does not need certification or identification.
- The dog may be trained by an organization or by an individual.
- In some cases, the service animal may be a miniature horse.
Sometimes confused with service dogs are:

- Emotional support animals (dogs and many other species), which provide comfort to their partners but don’t perform any physical task;
- Therapy dogs, which interact with a number of individuals in hospitals, libraries, residential facilities, etc.

What can you ask to determine if it is a service dog?

1. Is the dog required because of a disability?

2. What task(s) has the dog been trained to carry out?
Americans with Disabilities Act, Titles II and I, March 15, 2011:

• A service dog is allowed to accompany its partner into any public area.
• A public area is an area where members of the public are allowed, even in private businesses.
• Reasonable accommodations must be made to allow the service dog access.

Access can be restricted if:

• The presence of the dog would cause safety or health hazards;
• The dog is not under control;
• The dog is not housebroken.
What do you have to consider?

- The need of the dog’s partner for its services during the lab;
- The possible exposure of the dog to hazardous chemicals and procedures;
- The safety of others in the laboratory.

Compare the protection for this dog and the students:
Is complete protection necessary?

A more practical approach:
Potential hazards for the dog in a chemistry laboratory:

- Dripping, spilled, or splashed chemicals
- Broken glass or spilled chemicals on the floor
- Heavier-than-air vapors
- Dropped glassware
- Solids brushed off a bench
- Noises
- Moving equipment

Possible locations for a dog:

- By the chemist's bench area
- In a recessed “wheelchair access” under a lab bench or under a table
- Against the wall
- Under a coat rack
- In a portable kennel inside the lab
- Outside the lab
- An adjacent non-lab room
Considerations for access:

- What services will the dog provide during the lab?
- Is there an acceptable alternative way of providing those services during the lab?
- How does the dog interact with and/or alert its partner?
- What emergency procedures are needed for the dog and its partner?

Further considerations:

- What areas of the lab are safe or potentially hazardous for the dog?
- What are the potential hazards due to chemicals used and operations conducted in the lab?
- What protective equipment and/or clothing is appropriate for the dog?
- What is necessary to minimize or prevent negative impact on others in the lab?
Recommended steps for the institution:

- Develop a written policy for service dogs, not only in the lab but for all parts of the institution:

**AREAS OFF-LIMITS TO SERVICE ANIMALS**

Teaching Laboratories: The natural organisms carried by dogs and other animals may negatively affect the outcome of experiments. At the same time, the chemicals and/or organisms used in the experiments may be harmful to service animals.

Mechanical Rooms/Custodial Closets: Mechanical rooms, such as boiler rooms, facility equipment rooms, electric closets, elevator control rooms and custodial closets are off-limits to service animals. The machinery and/or chemicals in these rooms may be harmful to animals.

Areas Where Protective Clothing is Necessary: Any room where protective clothing is worn is off-limits to service animals.

Areas Where There is a Danger to the Service Animal: Any room, including a classroom, where there are sharp metal cuttings or other sharp objects on the floor or protruding from the surface; where there is hot material on the floor; where there is a high level of dust; where there is moving machinery is off-limits to animals.

**EXCEPTIONS**

- A laboratory director may open his or her laboratory to all service animals.
- A laboratory director or instructor in a classroom or teaching laboratory with moving equipment may grant permission to an individual animal/partner team to enter the classroom or teaching laboratory with moving machinery. Admission for each team will be granted or denied on a case-by-case basis. The final decision shall be made based on the nature of research or machinery and the best interest of the animal. Example: The machinery in a classroom may have moving parts at a height such that the tail of a large dog could easily get caught in it — this is a valid reason for keeping large dogs out. However, a very small hearing dog may be shorter than any moving part and therefore may be considered for admission to the classroom.
- Access to other designated off-limits areas may be granted on a case-by-case basis.
- To be Granted an Exception: A student who wants her or his animal to be granted admission to an off-limits area should contact his/her Disability Advisor. An employee should contact the Director of Human Resources. Visitors should contact the Disability Resource Coordinator.

Include a procedure for exceptions:
Also include emergency procedures for the entire campus, not just for laboratories.

EMERGENCY SITUATIONS

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

A shorter statement of policy

C. Removal of a Service or Support Animal

1. University employees may request a handler remove a service or support animal from University areas for the following reasons:
   c. If the animal poses a substantial and direct threat to the health and safety of others, as determined by the University, and the threat cannot be reduced or eliminated by a reasonable accommodation.
      1) This determination requires an individualized assessment of the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications will mitigate the risk.
      2) Situations that may qualify as a direct threat include, but are not limited to, bringing a service animal into laboratories, animal research facilities, medical facilities and food preparation areas.

2. If an individual requests that a service or support animal be removed due to a medical condition that is affected by a service or support animal (i.e. respiratory disease, asthma, or severe allergies), the University will perform an individualized assessment of the situation and consider the needs of all parties in meeting its obligation to provide reasonable accommodations. The individual asking for the service or support animal to be removed due to a medical condition may be asked to provide medical documentation.
Most important:
Assess the entire laboratory environment and the necessary accommodations with:
- the dog’s partner
- the laboratory supervisor
- institutional representatives charged with the responsibility for meeting the needs of students (or faculty and staff) with disabilities

Thanks are extended to:
- Puppy raisers and graduate teams, especially from Canine Companions for Independence
- Colleagues on the ACS Committee on Chemical Safety
- Colleagues on the ACS Committee on Chemists with Disabilities
- Peer reviewers for the Journal of Chemical Health and Safety and Accessibility in the Laboratory
For further information:

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- Redden, P and Sweet, C., Service Dogs in the Chemistry Laboratory, *Accessibility in the Laboratory, ACS Symposium Series 1272*, 2018, pp 89-97

- Redden, P. Service Dogs in the Chemistry Laboratory, *Journal of Chemical Health & Safety*, 2016, 23(1), 32-34

- [http://www.ada.gov/service_animals_2010.htm](http://www.ada.gov/service_animals_2010.htm)