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**Emotional Support Animals on Campus: An Analysis of Relevance, Benefits, and
Controversies**

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Emotional Support Animals on Campus: Relevance, Benefits, and Controversies

Introduction

In recent years, research surrounding the mental health of college students shows that young adults are struggling more than ever before. The Healthy Minds Study collects data from 373 universities nationwide and found that over 60% of college students meet the criteria for one or more mental health problems (Lipson et al., 2022). In another national survey, almost three-quarters of students report experiencing moderate or severe psychological distress, according to the National College Health Assessment (American College Health Association, 2021). College students today are facing significantly more stress, challenges, trauma, and loss, especially during a time of the COVID-19 pandemic. The adjustment that comes with learning to be independent while navigating academics, employment, and other responsibilities can easily prove to be too much.

Service animals have been used for decades to assist people with both physical and/or psychological disabilities to help them live a higher quality, more independent life. While service animals are subject to numerous regulations surrounding training, certification, documentation, etc., another type of assistance animal, the *Emotional Support Animal (ESA)*, has been becoming more popular. They provide comfort and assistance to persons with qualifying mental health conditions. ESAs have different regulations than service animals. While they do not share all of the same rights that a service animal has, they are still protected under the Fair Housing Act and receive more rights than a typical companion animal, or pet. Relevant to this analysis, emotional support animals can surpass regulations when it comes to housing. The Fair Housing Act states that ESAs have the legal right to live with their handler, even in non-pet-friendly communities, such as college campuses (FHA, n.d.). Thus, universities have been receiving increasing student

requests for ESAs in the past few years. The purpose of this analysis is to discuss research pertaining to the relevance, benefits, and controversies when it comes to emotional support animals on the college campus.

The Human-Animal Bond

As defined by the American Veterinary Medical Association's Committee, the human-animal bond is "a mutually beneficial and dynamic relationship between people and other animals that is influenced by behaviors that are essential to the health and well-being of both. This includes but is not limited to, emotional, psychological, and physical interactions of people, other animals, and the environment," (JAVMA, 1998). In 2020, the National Pet Owners Survey, conducted by the American Pet Products Association, found that around 85 million American families (or 67%) own some type of pet. The highest percentages of pet ownership are 38.4% [of households] own a dog and 25.4% own cats. For every 2.4 people, there is one cat or dog (Humane Society of the United States, 2018). Why are cats and dogs the most commonly chosen companion animals? Research suggests that this is because cats and dogs have the closest social organization and communication systems to humans of all companion animals. The human-animal bond is strongest when the two species can best understand each other. It creates a feeling of increasing trust over time (Robinson, 1995). The most surface-level perspective of having a pet might be that the animal fills space in one's life. Many people, especially those who are single and/or do not have children, express that they treat their pets similarly to how they would their children. Instead of coming home to an empty house, they are greeted by an animal whom they share a mutual bond with. However, animals provide much more than one might think.

Nearly 40% of American households own a dog, making them the most common companion animal of all. Dogs are known to be well-liked by most of the population, and this is

clear through the interactions seen every day. In recent years, social media brings forth even more proof of the bond shared between humans and dogs. Millions of heartwarming photos and videos have been shared online of dogs and their owners, and the overwhelmingly positive responses to this media demonstrate the way dogs bring people together. This is not a coincidence. The relationship between dogs and humans has been studied for many years, and this bond goes back thousands of years before the present day. The most commonly accepted date of dogs' domestication is placed around 14,000-10,000 years ago. Some anthropologists even suggest that the human-dog relationship may be almost as old as man himself. Over time, dogs have proven themselves to have unusually strong skills when it comes to reading human social and communicative behavior (Cirulli et al., 2011). "This so-called emotional evolution placed dogs in a new adaptive space in which they were able to interact with humans as comfortably with their conspecifics, and has laid a foundation for the establishment of the human-dog bond," (Cirulli et al., 2011). This relationship has strong analogies to the parent-child attachment.

The Biopsychosocial Benefits of the Human-Animal Bond

Several researchers have studied the impact that animals have on the brain's neurotransmitters. A significant study by Odendaal and Meintjes (2003) studied 18 subjects and the changes that petting and talking to their pet dogs had on their brain. The data showed their oxytocin levels almost doubled, as well as a significant decrease in cortisol levels. There was also an increase in beta-endorphins and dopamine production. There is also increasing evidence showing that pets are associated with more positive health outcomes in people. The most cited effects are lowered risk for cardiovascular disease, a higher chance of survival after myocardial infarction, less need for physician services during stressful life events, and a highly significant

reduction in minor health concerns within the first few months of acquiring a pet (Cirulli, 2011). Wilson (1987) also studied physiological responses that come from exposure to animals. He examined blood pressure (BP) and heart rate (HR) in college students while reading aloud, reading quietly, and petting a dog (not reading). Petting the dog was associated with less physiological response and diastolic BP was lower. Findings suggest that close affiliation with a pet often decreases autonomic arousal, and positive interaction with the dog was as relaxing as quiet book-reading.

Negative affective states such as depression and anxiety are associated with many health concerns. These include but are not limited to, increased risk of coronary heart disease, type 2 diabetes, disability, and even premature mortality. In contrast, positive affective states are protective, especially those arising from close social relationships (Stephoe et al., 2005). The presence of animals, or even the observation of them, buffers both the psychological and physiological responses to stress and anxiety. Domesticated animals fulfill the basic human need for attention and affiliation, and this is especially important for those who lack a close human support system. They possess an ability to break down barriers of isolation and reconnect people to the outside world (Serpell, 1996). The presence of pets also often serves as an icebreaker, as they catalyze communication and create opportunities for social engagement and shared interest. This produces a feeling of social integration for those who are otherwise feeling isolated (Cirulli et al., 2011). The human-animal bond is still being researched today, as there is still so much to be studied. However, through the current research so far, it is clear the benefits pets provide for the 67% of American families who are owners of them.

Differentiation Between Animal Categories

There are a variety of ways the human-animal bond is utilized, both formally and informally. Service animals, therapy animals, emotional support animals, and companion animals all have different purposes, and their titles are not always interchangeable. Each type of animal has different training requirements and rights of access (HEMHA, 2023). For this analysis, it is important to define the terminology, training, rights of access, and documentation/credentialing requirements for each category.

Companion Animals

Companion animals are the most common type of animal owned by the general public. Also known as “pets,” these animals are kept for pleasure and not specifically for utility purposes. The American Society for the Prevention of Cruelty to Animals generally recognizes dogs, cats, horses, rabbits, ferrets, guinea pigs, birds, small mammals and reptiles, and fish as appropriate companion animals. Companion animals are not trained for any specific function, but rather for simply the benefit of the human-animal bond. They do not require any documentation or credentialing to keep them as a pet. Local licensing laws and vaccinations are the only requirements to be followed.

Service Animals

Service animals are dogs that are specifically trained to work and perform tasks for individuals with disabilities. The tasks they perform are directly related to the disability and serve the function of assisting the person in living a more independent and high-quality life. Service dogs are required to be individually trained for their functions. Some examples of services provided may be guiding a blind individual, pulling a wheelchair, or retrieving items for a person with a disability. Their services may also be invisible to the naked eye, such as dogs that

assist with post-traumatic stress disorder, seizures, diabetes, and other mental illnesses (HEMHA, 2023). Service dogs may be trained by an organization that specializes in training, or by the individual independently. Regardless, they must be housebroken, well-behaved, and able to perform the necessary tasks. These animals do not require specific documentation when it comes to public access and housing.

The Americans with Disabilities Act (ADA) specifies that service animals may accompany people with disabilities wherever covered entities allow access. It is a violation of the ADA to question the owner regarding their disability, ask for the identification of the dog's training, or request a demonstration of its services (U.S. Department of Justice, 2011). Service animals must always be in control of the handler and have a harness, leash, or another tether to the person. Persons with disabilities utilizing a service dog may not be segregated from other consumers in any scenario. They cannot be denied access regardless of allergies or phobias. In these types of instances, both individuals must be accommodated. Fees relating to pets are also required to be waived, except in the instance of property damage. These regulations are significant to places such as university housing or other shared living spaces.

Therapy Animals

Therapy animals are pets that are extremely social and interact well with a wide variety of people (HEMHA, 2023). They are temperament tested and receive special training to interact safely with others in many different environments. Therapy animals may be seen in hospitals, schools, or rehabilitation facilities. They work well with people of all ages, from children to older adults. Dogs are also the most common type of therapy animal, but other domesticated species may be utilized. Therapy animals can be used for many purposes, such as animal-assisted interventions (AAI), animal-assisted activities (AAA), and animal-assisted therapy (AAT),

among other categories. Their work is directed towards a specific goal, and their handler, usually a credentialed professional, is thoroughly trained and educated on the type of activity being used. Therapy animals have no special rights of access; they are not covered under the ADA, Fair Housing Act, or Air Carrier Access Act. They may only enter spaces where invited and approved.

Therapy animals are not required to have any specific certifications but are still certified, usually through nonprofit organizations. They undergo things like temperament and obedience testing to ensure they are fit to perform the work expected. They are required by law, however, to be up to date on vaccinations and in good health. Their handler is also required to have liability insurance in case of injury to (or by) the animal when working (HEMHA, 2023).

Emotional Support Animals

The last category to be discussed is emotional support animals, the main focus of this analysis. Emotional support animals (or ESAs) are pets that provide therapeutic assistance to individuals with qualifying medical, mental, or chronic health conditions that rise to the level of disability (HEMHA, 2023). These animals are excluded by the ADA but are covered under the Fair Housing Act. They are intended to utilize the human-animal bond to provide comfort and companionship. Their main purpose is to be present to the owner. To qualify for an ESA, a person must be diagnosed with a disability and have a supporting healthcare provider who can attest to the animal alleviating some of their symptoms.

ESAs are covered in their right not to face discrimination in housing. Under the Fair Housing Act of 2020, they are a “reasonable accommodation”, meaning they are exempt from animal size/breed restrictions, “no pets” rules, and fees in housing communities (HUD, 2020).

Property owners are legally able to ask for documentation of the accommodation and charge fees for any damages to housing caused by the animal. They may not, however, question the nature or severity of the disability being accommodated (HEMHA, 2023). The key difference between emotional support and service animals is that ESAs are not granted public access. Individuals may not bring their ESA into settings such as a classroom or dining hall. The Air Carrier Access Act also specifies that airlines may treat ESAs as any other pets.

A Mental Health Crisis for Young Adults

According to the National Alliance on Mental Illness (2020), one in three young adults (aged 18-25) has experienced mental illness. One in ten has experienced severe mental illness, and 3.8 million had serious thoughts of suicide. A study done by Twenge et al. (2010) found that in 2007, five times as many college students surpassed the clinical cutoff for various mental health categories, compared to decades before. This number has undoubtedly only increased significantly leading up to the present. What makes these statistics more profound is that only 48% and 62% received treatment for mental illness and serious mental illness, respectively. In the age of COVID-19, among the many other impactful and often traumatic national events, young adults are struggling more than ever with mental health. Another notable statistic is that 75% of chronic, lifetime mental disorders have their first onset within the typical college age range of 18-24 years (Kessler et al., 2005). “Some commentators have indicated that this intensification of students’ psychological and emotional needs suggest a mental health crisis,” (Von Bergen, 2015).

There are several reasons why the number of students with mental health conditions could be increasing so heavily. In recent years, the discussion about mental health has become significantly more open, with people feeling more comfortable disclosing their struggle with

mental illness or reaching out for help. There are also more services being offered to students with disabilities, such as specific departments for student disability services, university counseling, and other supportive services. Finally, the stressors of the transition from being dependent on one's family to attending college and being forced to become significantly more independent can lead to the development or onset of mental disorders. These statistics put universities in a position of need to accommodate students' psychological needs for them to be able to attend school successfully, which brings up the increasing relevance of emotional support animals.

Benefits of Emotional Support Animal Intervention for College Students: Analysis of a Mixed-Method Study

Kirnan et al. (2021) performed a research study to detail some of the benefits an ESA provides for college students' mental health and well-being. The study included qualitative interviews as well as a quantitative analysis of archived data. The archived data came from the Accessibility Resource Center, or ARC, on the campus of a medium-sized, four-year university in the northeast. It was used to gather information on students utilizing ESAs during the years 2014-2018. The ARC director transcribed data confidentially on student demographics, the process for obtaining the ESA, the reason for the ESA, and additional specifics about the animal (Kirnan et al., 2021). The data showed a few relevant details. Several students provided multiple reasons for requesting the ESA. Reasons (in order of prevalence) included anxiety, depression, general mental health, social anxiety, homesickness/adjustment, and anxiety attacks. The most common animals were dogs and cats. Requests for ESAs grew from one in 2014 to eight in 2018. This archived data supports the findings of many others: the increased prevalence of ESAs at

universities, common disorders that ESAs have been known to assist with, and the most common types of support animals.

Participants for the qualitative interviews included nine students who utilize an ESA at the same college the data retrieved from. Researchers found numerous benefits relating to having an ESA on campus. The most dominant benefits discovered were presence, social catalyst, symptom alleviation, and empowerment.

For many participants in the study, simply the presence of their animal was a significant benefit. One student noted that the predictability of the animal always being there was helpful to her. She expressed that while she only can see a licensed mental health professional once a week (or less), her ESA is there every day of the week. Other students interviewed said that if they were not able to have their ESA present, they would have commuted to campus or even taken a gap year (Kirnan et al., 2021). This is significant because the support animal is contributing to the student being able to attend the university and function appropriately.

Several students expressed that having their ESA on campus facilitates their socialization and encourages them to step outside their comfort zone, rather than isolate themselves (Kirnan et al., 2021). Mental illness often puts individuals in a place of feeling lonely or unmotivated, leading to social isolation, which heavily contributes to the worsening of symptoms.

The students being interviewed shared that their support animals perform specific tasks to help alleviate symptoms of their mental health conditions. One of the students described his experience with an ESA and being diagnosed with post-traumatic stress disorder. He noted that his cat can actually realize when he is experiencing PTSD symptoms. The cat will come over to him, start purring, and let him hold onto him until he realizes his owner is okay again. The

student stated that the purring sounds of his cat help reduce the physical symptoms of PTSD (Kirnan et al., 2021). This is true; a cat's purr has real healing power. Cats purr at a frequency between 25 and 150 Hertz. Research in this area has shown that sound frequencies in this range can promote physical healing (CMA, 2012). It is believed to help with infections, swelling, pain, muscle and tendon repair, and joint mobility. It also lowers stress. Dr. Leslie A. Lyons, Ph.D., explained that a purring cat has a calming effect, decreasing symptoms of dyspnea (difficulty breathing), lowering blood pressure, and reducing heart disease risk. Due to this, cat owners have, on average, 40% less risk of having a heart attack (Young, 2018).

Finally, the last major benefit reported by the participants was empowerment. Several students shared that their ESA motivates them and taught them to be responsible. One explained that their dog gives them the drive to get out of bed each day. They said that caring for the dog forced them to get out on campus and challenged them due to the many responsibilities of caring for an animal. Another student noted that she feels more mature and independent because she has proven to herself that she can take care of both her cat and herself (Kirnan et al., 2021). As mentioned previously, the struggle with sudden independence and responsibility is a major factor in the increase in mental illness among college students. The study found that having an ESA facilitated the students to manage more responsibility through something they care about (the support animal).

The main purpose of an ESA is to provide comfort and psycho-social support. The findings in the study support this idea. The study is strong in the way it includes three smaller studies combined into one discussion. The qualitative interviews provide detailed responses from the participants and cover a wide range of aspects relating to ESAs and their effects. A limitation of this study is the small sample size and lack of input from students at other universities or

locations. However, the researchers discuss that their findings do not vary from other similar studies. Their findings are comparable with the themes discovered in a multitude of other research.

Emotional Support Animals and University Housing

Universities have been accommodating animal-assisted interventions for students for decades. Traditionally, this included service animals that are specifically trained to work for individuals with disabilities. In recent years, schools have received more and more requests to bring support animals to campus as accommodation. Research shows that the human-animal bond provides a wide range of benefits to physical, social, and emotional health. Emotional support animals can make institutions more accessible for students with mental health disorders and disabilities, along with enriching educational communities by more students being accommodated (Phillips, 2016). It is relevant to mention the previous study, as several students expressed that being denied their ESA on campus would have pushed them to commute to school rather than live on campus, and some students noted that they may not be able to attend college at all. “The inability for a student to utilize their service animal or ESA for the benefit of their college education is a detriment to their college success and negates the leveling of the ‘playing field’ for optimal learning,” (Phillips, 2016). Rights to an ESA are enforced by the Fair Housing Act, ADA amendments, and some state laws. Access to them for students who are legally entitled is crucial to their academic and overall success. However, while many benefits come from ESAs, there are also controversies and barriers to obtaining an ESA that arise within the discussion of support animals and university housing.

Suggestions for General University Policies Surrounding ESAs

The rise in emotional support animal requests has led to discussion within universities about the risks and controversies of ESAs on campus. One of the main concerns when it comes to ESAs is the fact that they are not required to be trained, temperament tested, or properly socialized in a variety of situations. Compared to a service or therapy animal, ESAs are significantly less regulated, which can be cause for concern due to a few reasons. The Higher Education Mental Health Alliance discusses that ESAs have the potential to: “(1) harm or interfere with the duties of a trained service animal; (2) cause distress for members of the public; or (3) be exposed to stressors detrimental to the ESA,” (HEMHA, 2023). It is essential to avoid these scenarios that can negatively impact both the student and the animal.

For universities interested in creating solid policies surrounding ESAs, a few general guidelines can be applied when it comes to preventing some of these issues on campus. First, public health policies are necessary. This would include things such as designating areas for pet relief and waste disposal, requiring vaccinations to prevent diseases, and preventative treatment for parasites including ticks, fleas, etc. Another major concern at many universities is allergies and phobias within the student body, and how both ESAs and other students can be accommodated. This can be done by creating housing forms. It is important to protect the rights of students with documented disabilities and ensure they can live with their ESA in an environment that will not harm the health of other students. College campuses may need to request information from incoming students about their openness to living near an animal. This information will prevent placing a student with an allergy or phobia in the same housing as another’s support animal. “By asking all students about their interests, the IHE can prevent disclosure of a student’s disability and right to bring an assistance animal to campus,” (HEMHA, 2023). The consequence that goes along with this, though, is that inquiring about all students’

preferences for living with an animal, may imply to some that the campus is animal-friendly when it is not.

Finally, one more issue that may arise is animal aggression. Because ESAs are not required to go through much of the training a service dog would, aggressive animals are a potential concern. In the case of an animal becoming aggressive, there must be procedures in place on how to diffuse and handle the situation. Consequences for a student bringing an aggressive animal on campus should be explicitly written in policies and the animal approval contract (HEMHA, 2023). Students should also be routinely reminded of the circumstances that qualify the university to require them to remove their animals from campus. Training, when it comes to identifying/removing aggressive animals, is necessary for housing staff, as well as knowledge about ESA policies and rights.

University Housing Concerns Relating to ESAs

As stated previously, support animals are protected within the Fair Housing Agreement, and students are legally obligated to receive reasonable accommodation for their ESA on campus. “Housing providers cannot refuse to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling,” (HUD, n.d.). ESAs are protected under disability status. Universities need to understand the legal guidelines surrounding them, otherwise, they may run into significant troubles. In *United States v. Nebraska Kearney*, a student with depression and anxiety sought ESA accommodation to assist with some of her needs. The university denied the request and the student sued. The decision was overturned with a ruling that included the college paying \$140,000 (Hutchens, 2014). The university was required to amend its rules to note that on-campus housing is considered a “dwelling,” and thus subject to

FHA provisions, which ESAs are protected under. While support animals may not have all the same rights as service animals, they have some similarities, especially when it comes to living environments. See the table below from the *Journal of College Student Psychotherapy* for a comparison of rights relating to service animals and ESAs. Regardless, many universities are still learning to navigate processes and policies regarding ESAs and on-campus housing.

Table 1. Comparison of Service Animal and Emotional Support Animal Characteristics and Regulations.

	Service Animals	Emotional Support Animals
Definition	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.	Provide necessary emotional support to individuals with disabilities, and alleviate one or more identified symptoms of a person's disability.
Disability	Individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one or more major life activities.	Individuals with disabilities are defined as persons with a physical or mental impairment which substantially limits one or more major life activities.
What can be asked	Is this a service animal? What service/skill/task does the animal do?	The student is required to submit a letter from a mental health professional that addresses the question as to how the emotional support animal alleviates symptoms associated with their disability.
Type	Dog or miniature horse.	Any species of animal that is permitted under state law and local ordinances.
Training	Trained to perform tasks for the benefit of an individual with a disability.	None required
Where permitted	All places of public accommodation— campus buildings, residence halls, and anywhere on campus they are needed to assist an individual with a disability to participate in educational programs and other campus activities.	Residence halls Classrooms—case-by-case basis determination
Regulations	Must be under effective control at all times Follow all state laws and local ordinances	Must be under effective control at all times Follow all state laws and local ordinances

When a student receives approval for their ESA, there should be a formal contract created between the Institute of Higher Education (IHE) and the student, outlining protocols, rules, and other necessary information regarding their animal and its care. Residence life staff should be

trained in all policies surrounding ESAs, and a few new responsibilities may need to be put in place. For example, the possibility of an abandoned animal is realistic. Staff might need to start checking for animals during their rounds before university breaks, holidays, or closings to prevent neglect. They should also be knowledgeable about scenarios where animal welfare is at risk. Within universities, there is always a concern about neglect or abuse of students' animals. Intentional cruelty, neglect, abuse, lack of veterinary care, abandonment, and inadequate shelter are all possibilities.

Aggression between animals living on campus is also a risk. Animals have species-specific behaviors and needs. Outlined by HEMHA (2023), these include prey and predator drives, socialization needs, and unique personalities that influence behavior. Multiple ESAs being on campus creates the opportunity for complications of incompatible species. For example, one student's rabbit ESA may be prey for another's dog or snake. Anyone working in an environment where students may bring their ESA should be able to recognize and report animal cruelty immediately if seen. One more concern within on-campus housing would be roommate conflicts. For many people, living with an animal may be appealing at first. However, in the context of shared housing such as a dorm, students may be unprepared for the issues that can occur. Conflicts between roommates may arise due to smells, animal caretaking, or property destruction (Foster et al., 2020). Room changes may be necessary in some cases. Housing staff must be able to help dissolve roommate conflicts while maintaining the confidentiality of disability-related information surrounding the student and their ESA. Solutions must also be intact with legal regulations regarding ESAs and reasonable accommodation.

University Counseling Centers' Perceptions and Experiences Pertaining to Emotional Support Animals: A Study by Kogan et al. (2016)

A study performed by Kogan et al. (2016) aimed to collect data on the experiences of university counseling centers (UCCs) relating to emotional support animals. An online survey was created and sent to the directors of counseling centers at 737 various institutions. The survey consisted of questions about how often they receive requests to write letters in support of students' needs for an ESA, how they handle these requests, and how they handle requests from students to diagnose a disability that qualifies for an ESA. It also had a few inquiries about university and UCC policies for ESAs. 248 respondents completed the survey.

Requests for writing letters to support a student's need for an ESA were most commonly "almost never" (56.9%), followed by several times a year (31.05%), at least once per month (9.68%), and more than once a week (2.42%). The few questions that followed related to how the UCC handles client requests to write ESA letters of support. Directors were asked if they have an "in-house" policy (and if it is working), or if they recommend other resources. Most commonly, respondents stated that they do not have an "in-house" policy (38.02%) or that they recommend another resource (38.02%). Comments written by respondents who say they recommend other resources often discussed that they felt it was outside their mission and refer students to disability resources on campus, or to off-campus resources such as private practitioners who will diagnose disabilities (Kogan et al., 2016). Something to mention within this topic is that a common issue with UCCs is that staff are often not trained in the realm of writing letters of support for ESAs and are not currently knowledgeable enough on the topic to properly navigate the situation. It is outside their scope of practice. A positive step would be to start incorporating training on ESA guidelines, procedures, and policies, so counseling centers can support more students.

Next in the survey, participants were asked how their UCC handles student requests to diagnose a disability to obtain an ESA. The most common response here was that they do not diagnose disabilities (47.18%), and 29.44% indicate they diagnose disabilities only on a case-by-case basis, and it appears to be working. Generally, those who stated they have an “in-house” policy replied that the policy is to not diagnose. 20.16% responded “other” to this prompt, typically writing in that they very infrequently will diagnose students (usually only for long-term clients, and even then, do not tend to support ESA requests). Only four schools out of the 248 who responded stated that they diagnose students and will recommend ESAs (Kogan et al., 2016).

Lastly, respondents were asked about current ESA policies at their universities. A high 81.3% stated that they have no current policies (Kogan et al., 2016). This is a cause for concern, as recent studies surrounding ESA requests on college campuses indicate that they are only increasing over time. A lack of policy around ESAs has the potential to cause many issues; it creates unclear expectations and minimal understanding when it comes to legal obligations and regulations. Universities must start thinking about how they will handle this rise in expressed student need for support animals.

Implications for Western Michigan University (WMU)

When researching current policies around emotional support animals at WMU, the university does have a well-outlined “Animals on Campus” policy. As found in the study by Kogan et al. (2016) earlier, numerous campuses around the country do not yet have any ESA guidelines in place, so this is a step in the right direction for WMU. Policy number 18-01 outlines “requirements for the location, behavior, and treatment of animals on campus and explains the responsibilities of people who seek to bring animals onto University property,”

(WMU, 2022). Specifically, the policy also discusses assistance animals such as service animals, emotional support animals, and therapy animals, as well as answers common questions regarding their rights on campus.

Key Definitions to Understand Within the Policy

Some of the key definitions significant to the policy include descriptions of the various types of assistance animals (these are similar to definitions referenced in previous sections of this analysis), *controlled spaces*, *major bodily functions*, *major life activities*, *reasonable accommodation (RA)*, and both *qualified students* and *qualified employees*. *Controlled spaces*, as defined by the university, are indoor areas owned or controlled by WMU, and outdoor areas owned or controlled by WMU that have limitations around use and access such as practice fields, stadiums, etc. (WMU, 2022). *Major bodily functions* are relevant when it comes to assistance animals and their purposes. They include things like functions of the immune system, cell growth, neurological, respiratory, circulatory, and endocrine functions (WMU, 2022). *Major life activities* are tasks and activities necessary to a person's daily functioning. The university lists some of these as caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, learning, concentrating, thinking, communicating, and working (WMU, 2022), among many others. A *reasonable accommodation* at WMU is defined as:

any change in the workplace, course of instruction, program, or the way things are customarily done, that provides Qualified Individuals with an equal opportunity to participate and that does not impose an undue hardship on the University or fundamentally alter the workplace, education, or other University Program (WMU, 2022).

Finally, following that, the meaning of a *qualified student or employee* is important to understand because they are persons with a disability who, with or without reasonable accommodation, can perform essential functions to participate in a work position or the university's academic programs (WMU, 2022).

WMU Policies Regarding Animals on Campus

The policy describes basic rules and regulations surrounding animals being on campus. Similar to ideas previously mentioned, animals qualified to be on campus (such as assistance animals) are required to be harnessed, leashed, tethered, etc., and be in the control of the handler at all times. Handlers are financially responsible for any actions of the animal that cause harm to property or others. Handlers must also abide by any current laws and regulations on licensing, vaccinations, and other animal requirements.

Animals in Housing. Qualified students receiving reasonable accommodation for their support animal are legally obligated to be allowed to have them in university housing. Requests for ESAs are taken on a case-by-case basis. They are expected to not impose any undue financial burden, fundamentally alter housing policies, pose any threat to the health and safety of others, or cause significant property damage (WMU, 2022). ESAs are only allowed in their housing facility; they do not have the right to be in other controlled spaces. ESAs also are required to be properly cared for in university housing.

ESA Approval. Both Disability Services for Students (DSS) and Residence Life must approve the ESA for on-campus housing. After receiving DSS approval (based on reasonable accommodation policies), Residence Life will also approve the animal. Factors considered are the size of the animal in relation to housing space, how the animal's presence will affect others in

housing, and the previous behavior of the animal. Generally, only animals commonly kept in households are allowed to be considered.

Removal of an ESA. There are a few scenarios where an ESA may be required to be removed from housing. Scenarios include if the animal is posing a direct threat to others' health and safety, if significant property damage is occurring, if the qualified student does not comply with the policy, or if the presence of the animal is creating an unmanageable disturbance to the community (WMU, 2022).

DSS Procedure for Assistance Animal Accommodation. Any student requesting an emotional support animal must be registered with Disability Services for Students. The student needs documentation from a licensed professional such as a counselor, psychologist, psychiatrist, or general care practitioner. Documentation must state diagnoses, the length of time the student has been working with the professional (minimum of three months), and the symptoms of the assistance animal alleviates for the student (WMU, 2022). After receiving documentation, the director of DSS will bring the request to the DSS Assistance Animal Committee to be considered.

Student Experience with Emotional Support Animals at Western Michigan University: Research Study Setup

It would be beneficial to conduct a research study here at Western Michigan University (WMU) to compile feedback from students who have requested emotional support animals and/or currently have them. Sometimes, students can face many obstacles in the process of having their ESA approved. For example, many students move to campus from other cities, states, and countries. It may be difficult for them to see an off-campus health professional to

receive proper documentation, especially for at least three months. Or, they may not have the financial status to pay for all of the required appointments and documentation. Obstacles like these, and not being able to have their ESA approved, can create many difficulties for students who would highly benefit from an assistance animal.

This feedback could help WMU see the benefits and challenges concerning their accommodation policies for assistance animals. It would also give insight into students with support animals' opinions on the idea of having a pet-friendly residence hall to remove some of the challenges faced throughout the approval process. In theory, data would likely be collected from WMU's Disability Services for Students (DSS) surrounding students and ESAs. The data would provide information such as the number of students with an ESA, the number of requests per month/year, the policies for ESAs, and the university counseling center approach to support animals and student diagnosing procedures (if any). The data would be transcribed to be confidential and protect any information about students' disabilities or reasoning behind the ESA. A voluntary survey could then be sent out to these students, asking for their participation in a research study that would benefit the university's understanding of student experiences with their support animal. A few suggested survey questions will be listed below. The questions pertain to topics like the benefits of one's ESA, basic information about the animal (such as species), and obstacles surrounding obtaining documentation for the ESA/their approval process at WMU. Notice that each question has the option to refrain from responding. The survey would be completely voluntary, and students would not be obligated to answer every question, in the instance that any cause discomfort.

Sample Survey Questions for a Study on Student Experiences with ESAs at Western Michigan University

1. There are many types of animals being utilized as ESAs. What type of animal is your ESA?

- a. Dog
- b. Cat
- c. Rabbit
- d. Other (please specify below)
- e. Prefer not to answer

2. ESAs can benefit a person in multiple ways depending on their individual situation. In what ways do you feel your ESA benefits you? (Check all that apply)

- a. Mental health
- b. Physical health
- c. Social health
- d. Academics
- e. Motivation
- f. Personal and/or spiritual values
- g. Other (please specify below)
- h. Prefer not to answer

3. Have you seen a positive change in your academic success while having an approved ESA in your environment?

- a. Yes
- b. No
- c. Somewhat
- d. Prefer not to answer

4. If desired, please share the ways your ESA contributes to your academic success.
5. Documented proof of a qualifying disability from a licensed healthcare professional must be presented in order for your ESA to be approved on (and off) campus under the Fair Housing Act. How difficult was it for you to receive this documentation?
 - a. Not difficult at all
 - b. Somewhat difficult
 - c. Very difficult
 - d. Could not become approved
 - e. Prefer not to answer
6. Did you experience any major obstacles in getting your ESA approved?
 - a. Yes
 - b. No
 - c. Prefer not to answer
7. If desired, please share what parts of the approval process were most challenging, or if you were not able to be approved, what obstacles did you face?
8. Some students experience major difficulties throughout the ESA approval process, which brings forth the idea of integrating a pet-friendly residence hall (pets, not just ESAs) to simplify the approval process and remove some common obstacles. Which of the following do you feel that WMU would benefit from, if any?
 - a. A pet-friendly residence hall
 - b. A pet-friendly campus
 - c. Neither
 - d. Other (please specify below)

- e. Prefer not to answer
9. If desired, please share any other feedback related to your experience with your ESA that you feel is significant.

Survey Discussion

This survey, or one similar, would provide many important details about the experiences of students with ESAs, the approval process, and any difficulties experienced along the way. Universities need to consider student feedback regarding their experiences and opinions. While it may not be feasible to incorporate all student feedback into university policies surrounding ESAs, it would give the university insight into what they can do to best support the student body. For many students, their ESA has been found to greatly benefit them throughout their college experience, and ESAs make college campuses more accessible to students with disabilities (especially non-visible ones).

Conclusions

After completing an analysis of numerous studies and pieces of literature, it is clear the benefits that an ESA provides for qualifying students. Studies such as Odendaal & Meinjes (2003), Wilson (1987), and Cirulli et al. (2011) detail some of the biopsychosocial benefits the human-animal bond provides. An increase in oxytocin, beta-endorphins, and dopamine, as well as a decrease in the stress response, were found in participants after interacting with a dog (Odendaal & Meinjes, 2003). A decrease in blood pressure and autonomic arousal response was recorded after participants pet a dog; this was equivalent to the physiological response after silent reading (Wilson, 1987). Finally, Cirulli et al. (2011) found that the presence of an animal serves as an icebreaker and can promote social integration for those otherwise feeling isolated. The

human-animal bond is healing and promotes well-being, especially for those with mental health conditions. Thus, ESAs are extremely beneficial to those who qualify.

As mentioned previously, young adults specifically are struggling with their mental health more than ever before. A large percentage of college students reported feeling moderate or severe psychological distress, according to the Healthy Minds Study in 2021. This is one of the reasons why student requests for ESAs on campus are increasing exponentially. Universities need to understand the legal guidelines attached to ESAs and other assistance animals to properly accommodate their students. Through this research, it was found that many universities nationwide seem to be unprepared for this rise in requests. Universities must adapt their policies and stay up to date on new information to avoid legal troubles. When looking into Western Michigan University's regulations pertaining to assistance animals and ESAs on campus, the college proved itself to have a decently outlined policy. There are still many ways this research can be utilized in the future to continue serving all students, regardless of their differences and/or needs when living on campus. The survey study outlined previously would be a good place to start in terms of acquiring student input and experiences.

In conclusion, access to ESAs on campus is essential for students who qualify, and it's necessary for universities to be prepared and knowledgeable on the topic. The ESA provides numerous benefits to college students and promotes not just academic success, but the ability to thrive in all aspects of life.

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