

BOARD ADMINISTRATIVE PROCEDURE

Administrative Procedure

Administrative Procedure Number

Service Animals in Schools

706

Directional Policy

700 - Equity and Inclusive Education

Title of Administrative Procedure:

Service Animals in Schools

Date Approved:

April 8, 2025

Projected Review Date:

2030

Directional Policy Alignment:

The Service Animals in Schools Administrative Procedure is aligned with and reflects key tenets of the Equity and Inclusive Education Directional Policy 700 to achieve equitable and inclusive education that identifies and removes systemic barriers to student achievement, participation and well-being, and that fosters a learning and working environment free from oppression, discrimination and harassment. This policy reflects the seven guiding principles of Ontario's Equity and Inclusive Education Strategy, namely that equity and inclusive education:

- is a foundation of excellence;
- meets individual needs;
- identifies and eliminates barriers;
- promotes a sense of belonging;
- involves the broad community;
- builds on and enhances previous and existing initiatives;
- is demonstrated throughout the system.

Alignment with Multi-Year Strategic Plan:

This Service Animals in Schools Administrative Procedure informs priorities under the <u>PVNCCDSB Board Vision, Mission and Strategic Priorities</u>.

Purpose:

This Administrative Procedure identifies the process to be followed when a parent/guardian, a student who is 16 or 17 years old and has withdrawn from parental authority, or an adult student applies to the Board to have a Guide Dog or Service Animal accompany a student while they are attending school or school-related events.

Decisions regarding the use of a Guide Dog or Service Animal by students in the school environment are made on an individual basis in accordance with the Board's obligations under the Ontario Human Rights Code.

The Board has the authority to regulate the provisions of accommodation to meet the disability-related needs and/or needs of daily living of students while attending school.

The Board encourages any family considering the purchase of a Guide Dog, or Service Animal to meet with the School Principal or Superintendent before making any commitment.

Administrative Process:

- 1. A parent/guardian, a student who is 16 or 17 years old and has withdrawn from parental authority, or an adult student must submit the application and supporting documentation outlined in Appendix A (for Guide or Service Dogs) and Appendix B (for other Service Animals) to the School Principal.
- 2. The School Principal shall review the application for completeness and may request any additional information or clarification necessary to assess the request.
- 3. The School Principal will inform the Family of Schools Superintendent of this request. A case conference may be initiated.
- 4. The School Principal will render a decision within a reasonable time in accordance with this Administrative Procedure and advise the parent/guardian, the student who is 16 or 17 years old and has withdrawn from parental authority, or adult student of the decision.
- 5. Where the application is denied, the School Principal shall provide a rationale for their decision.

- 6. The parent/guardian or adult student may submit a written appeal to the School Principal within thirty (30) school days of receiving the decision regarding the application request.
- 7. As soon as possible thereafter, the School Principal will forward the application and supporting documentation to the Family of Schools Superintendent, who will consider the appeal in accordance with the Administrative Procedure. The Family of Schools Superintendent's decision is final. No other application may be submitted unless the student's circumstances have drastically changed.
- 8. Where the application is approved, the School Principal, the Family of Schools Superintendent and the parent/guardian, the student who is 16 or 17 years old and has withdrawn from parental authority, or the adult student will develop a Plan of Care for the Guide Dog or Service Animal and an accommodation plan for the student in accordance with this Administrative Procedure.
- 9. Copies of the licenses, certifications, vaccination, and liability insurance are required annually. It is the responsibility of the parent/guardian, the student who is 16 or 17 years old and has withdrawn from parental authority, or adult student to obtain and share them with the School Principal.
- 10. Parents/guardians, the student who is 16 or 17 years old and has withdrawn from parental authority or the adult student are required to submit an application every school year.
- 11. At any time, the Board may alter or revoke any decision made pursuant to this Administrative Procedure.

Due to risks to safety, and risks of disruption and distraction in the learning environment, the School Board does not permit training of potential Guide Dogs and Service Animals in the school setting or during school activities.

Review Process:

The School Principal is responsible to review the applications submitted, taking into account the following:

- a) The individual learning strengths and needs of the student;
- b) The student's IEP goals, safety support plan, medical plan of care, if any;

c) The relevant supporting documents (i.e. psychological assessments, occupational or physical therapy assessments, functional behaviour assessments, etc.);

d) The role of the Guide Dog or Service Animal at school and how the Guide Dog or Service Animal will provide an accommodation to a student for a disability-related learning needs and/or needs of daily living necessary while at school;

e) The information provided by a regulated healthcare professional supporting the request for a Guide Dog or Service Animal;

f) The presence or absence of training and certification of the Guide Dog or Service Animal;

g) The presence or absence of training of the student as a handler for the Guide Dog or Service Animal;

h) Whether training will be required for staff and/or the student;

i) The impacts of the accommodation on the student's dignity, integration and independence at school;

j) The impact of the Guide Dog or Service Animal on students and staff at school, including whether there are competing requests for an accommodation; and

k) The impacts of the accommodation on the learning environment (i.e. health and safety, classroom disruption or distraction, etc.).

Responsibilities:

The Board of Trustees is responsible for:

- ensuring alignment with the Equity and Inclusive Education Directional Policy; and
- reviewing the Service Animals in Schools Administrative Procedure as part of its regular policy and procedures review cycle.

The Director of Education is responsible for:

• designating resources for ensuring the implementation of and compliance with this Administrative Procedure.

Superintendents of Schools and System Portfolios are responsible for:

 reviewing and revising the Service Animals in Schools Administrative Procedure as necessary;

- supporting staff with the implementation of the process for service animal accommodation;
- conferring with principals of their families of schools upon receipt of request for a service animal; and
- reviewing a written appeal in accordance with this Administrative Procedure.

Principals and Vice-Principals are responsible for:

- informing the Requester of the Board's Administrative Procedures regarding the use of Guide Dogs and Service Animals;
- reviewing the application submitted by the Requester to ensure completeness and request any additional information or clarification when necessary;
- as applicable, inform staff, parents/guardians and students, using the letters at Appendix D as a guideline, of the possibility that a Guide Dog or Service Animal will be present in the School and invite staff, parents/guardians and students to provide their observations and to raise any concerns (e.g., allergies) within five (5) school days.
- if the application is approved, the School Principal shall invite the following persons to meet in order to develop a Plan of Care for the Guide Dog or Service Animal and, where required, an accommodation plan for the student:

The parent/guardian, the student, the student's Teacher(s), the Family of Schools Superintendent, the Special Education Teacher and any School or Board staff whose participation is deemed relevant, the student's regulated healthcare provider, and a representative from the animal training facility (if applicable).

- coordinating the establishment of a Plan of Care for the Guide dog or Service Animal to provide for details on transportation, care, hygiene and feeding of the animal, along with any other relevant information.
- communicating, the Plan of Care for the Guide Dog or Service Animal and the accommodation plan for the student to school staff that will be in contact with the student (e.g., teacher, educational assistant, etc.).
- developing strategies to address the following, as the case may be:
 - health and safety concerns (i.e. allergies, asthma, phobia, etc.);
 - transportation needs of the student with a Guide Dog or Service Animal;

- supporting staff and students in their interactions with the Guide Dog and Service Animal, including in the form of training;
- signage within the school;
- fire and emergency evacuation plans; and
- lockdown, hold and secure and safe school plans.
- refusing to admit to the school or any classroom a person, guide dog or service animal whose presence in the school or classroom would be detrimental to the physical or mental well-being of the students.

Teachers and Staff are responsible for:

- being familiar with and adhering to this Administrative Procedure in keeping with all other accommodations to learning for all students of the Board.
- ensuring that an appropriate and dignified explanation is given to students regarding the accommodation that is provided by guide dogs and service animals;
- ensuring the appropriate plans are followed within the school environment; and
- raising competing human rights interests to the attention of the School Principal in a timely manner.

The Requester (parent/guardian or adult student) is responsible for:

- submitting a complete application in accordance with Appendix A (for Guide or Service Dogs) and Appendix B (for other Service Animals), which includes:
 - providing confirmation of municipal license for the dog (to be updated annually),
 - providing confirmation of certificates of training not older than 6 months from an Accredited Training Organization attesting that the dog and student Handler have successfully completed training and may safely engage in a public setting without creating a risk of safety or a risk of disruption within a school setting;
 - providing a diagnosis from a registered pediatrician, psychologist, psychiatrist (or other regulated health professional as determined by the School Board) with a recommendation for the use of a Guide Dog/ Service Dog;
 - providing a description of the services provided by the Guide Dog/ Service Animal to the student, and how those services will accommodate the

student's disability-related needs and assist the student in achieving their learning goals and/or goals of daily living while at school;

- providing a certificate not greater than three (3) months old from a veterinarian qualified to practice veterinary medicine in the Province of Ontario attesting that, the dog is an adult; identifying the age and breed; does not have a disease or illness that might pose a risk to humans; has received all required vaccinations; and is in good health to assist the student (to be updated annually);
- obtaining general liability insurance providing coverage in an amount specified by the Board [1] in the event of an injury or death as a result of the Guide Dog / Service Animal's attendance on school property or on a school-related activity (to be updated annually)[2];

[1] Note usually \$2 million in general liability insurance coverage is requested and shall add the PVNCCDSB as an insured. This requirement might need to be waived on the basis of equity in the event that it causes financial hardship for a family. [2] Note insurance should not pose a barrier to the provision of accommodation as a result of socio-economic factors.

- working collaboratively with the School to ensure the success of the accommodation process.
- assuming all costs related to the Guide Dog or the Service Animal including, but not limited to, the animal itself, food, grooming, harness, crate and/or mats, training, insurance, licences and veterinarian services.

Students are responsible for (where the application has been granted):

- acting as the animal's primary handler and caregiver while at school;
- demonstrating the ability to control and care for the Guide Dog or Service Animal in accordance with the training received;
- ensuring that the Guide Dog or Service Animal is always wearing a vest and leash or harness when the dog is not in its crate;
- ensuring the Guide Dog or Service Animal does not disrupt the learning of others with unnecessary movement, vocalization or other behaviour, including aggressive or threatening behaviour;
- ensuring that the Guide Dog or Service Animal's biological needs are addressed;
- transitioning and maintaining at all times the Guide Dog/Service Dog on a leash, harness, mat and/or crate; and

 complying with an accommodation plan that addresses the competing rights of others.

Progress Indicators:

Data Collection:

The Board shall collect data regarding the implementation of the Administrative

Procedure, including:

a. Total number of requests for students to be accompanied by guide dogs or service animals (including number of requests for elementary and secondary, the student's grade and the handler);

b. The number of requests approved and denied:

i. If denied, the rationale for the decision, including a description of other supports and/or services provided to the student to support their access to the Ontario Curriculum;

ii. Species of service animals requested and approved; and

iii. Types of needs being supported.

Definitions:

For the purpose of this Procedure the following definitions apply:

Accredited training organization is a guide dog or service dog trainer that is accredited by:

International Guide Dog Federation ("IGDF"): which develops and ensures compliance with the standards by which Guide Dogs for the blind/low vision are trained by its member organizations; or

Assistance Dogs International ("ADI"): which develops and ensures compliance with the standards by which Guide, Hearing and Service Dogs are trained by its member organizations; or

A Guide Dog or Service Dog trainer that attests to compliance with the Meghan Search and Rescue Standard in Support of Accessibility: Persons with a Disability Teamed with Service Dogs standard for training (MSAR).

Adult student shall be defined to mean a student who is 18 years of age or older or 16 or 17 years of age and has removed him/her/themselves from the care and control of their custodial parent

Disability means,

- a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b. a condition of mental impairment or a developmental disability,
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d. a mental disorder, or
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the <u>Workplace Safety and Insurance Act.</u> <u>1997</u>;

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations pursuant to the Blind Persons' Rights Act;

Handler refers to the individual trained by an Accredited Training Organization who is managing the Guide Dog / Service Dog and in most cases will be the student for whom the Guide Dog / Service Dog is provided;

Parent shall be defined to mean a custodial parent of the student or a guardian pursuant to the Education Act;

Requester shall mean the person who submits the application on behalf of the student (i.e. the parent/guardian or adult student);

Service Dog means a dog which has been certified after successfully completing a training program provided by an Accredited Training Organization.

Service Animal means an animal that provides support relating to a student's disability-related needs and/or needs of daily living, assist that student in meaningfully assessing education and, where appropriate, has been certified after successfully completing a training program provided by an Accredited Training Organization.

References:

Human Rights Code, RSO 1990, c.H.19

Education Act, RSO 1990, c.E2, s. 170(1), s.265(1); O. Reg. 298, s.11

PPM 163 School Board Policies on Service Animals

J.F. v. Waterloo Catholic District School Board, 2017 HRTO 1121 (CanLII)

Accessibility for Ontarians with Disabilities Act, 2005, SO 2005, c.11

Blind Persons' Rights Act, RSO 1990, c.B7,

Dog Owners' Liability Act, RSO 1990, c.D16

Health Protection and Promotion Act, RSO 1990, c.H7

Food Safety and Quality Act 2001, SO 2001, c.20

Related Forms and Letters:

Appendix A Application Request for Guide Dog / Service Dog Appendix B Application Request for Service Animal Appendix C Checklist for Principals Appendix D (Sample Letters)

- Sample Letter to Employees & School Permit Holders
- Sample Letter to the School Community
- Sample Letter to the Parents of Students on the School Bus
- Sample Letter to Parents of Students in the Class(es)
- Sample Letter Approving the Guide Dog/Service Animal
- Sample Letter Denying the Guide Dog/Service Animal