IMPLEMENTATION OF EMOTIONAL SUPPORT ANIMAL POLICIES ON COLLEGE CAMPUSES

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Implementation of Emotional Support Animal Policies on College Campuses

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Abstract

Stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). In addition, students are reporting decreasing emotional health (Higher Education Research Institute, 2011). This is one possible explanation why the number of requests for emotional support animals (ESAs) on campuses has been increasing (Bauer-Wolf, 2019) as ESAs can support a student's emotional health (Brennan & Nguyen, 2014). In response to student requests, regulations, resulting guidance, and litigation, many higher education institutions have created and implemented ESA policies. A void appears to exist regarding what policies and procedures have been enacted about ESAs and the resulting staff experiences. Therefore, a survey research design was used for this quantitative study to investigate: what is the relationship between enacted ESA policy components and resulting staff experiences; which policy components contributed to staff experiences; and what differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences. A strong ESA policy was found to be associated with staff being less concerned with a complaint being filed with the Office for Civil Rights or similar state or federal agency and supports staff responding to situations related to ESAs. While no one specific policy component contributed to staff experiences more than another and no institutional characteristics had practical significance regarding enacted policy components or resulting staff experiences, respondents' characteristics did. The results demonstrate that as the staff's knowledge of the policy increases, the policy helpfulness also increases. Additionally, one's self-rated knowledge of the ESA policy affected the overall policy rating.

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Chapter I: Introduction

Transitioning to college is a major life event which can be viewed within the context of stressful life changes (Lu, 1994). In addition, the number of college students feeling overwhelmed is increasing and students are reporting decreasing emotional health (Higher Education Research Institute [HERI], 2011). Stress, which is one aspect of decreasing emotional health, is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). The trend of decreasing emotional health and the related impact on retention raises concerns for the collegiate community at both the student and institutional levels. Compounding this trend, Huang et al. (2018) notes that the traditional college age is when common mental health concerns such as generalized anxiety are at their developmental peak.

While the number of students reporting decreasing emotional health has increased (HERI, 2011), so has the number of students reporting a disability[1] (U.S. Department of Education, 2012; U.S. Department of Education, 2019). Students with a mental, emotional, or psychiatric disability may have an emotional support animal (ESA) which assist them to participate in college since one benefit of an ESA may be reduced anxiety (Yamamoto & Hart, 2019). In addition to anxiety, ESAs "provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias, but do not have special training to perform tasks that assist people with disabilities" (Brennan & Nguyen, 2014, section III).

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[1] "Students with disabilities are those who reported that they had one or more of the following conditions: blindness or visual impairment that cannot be corrected by wearing glasses; hearing impairment (e.g., deaf or hard of hearing); orthopedic or mobility impairment; speech or language impairment; learning, mental, emotional, or psychiatric condition (e.g., serious learning disability, depression, ADD, or ADHD); or other health impairment or problem" (U.S. Department of Education, 2019).

ESAs are different than pets as they assist someone with a disability which a pet may not do. While a person with a disability may have a pet, the pet is only considered an ESA if the animal provides "emotional support that alleviates one or more identified effects of a person's disability" (U.S. Department of Housing and Urban Development [HUD], n.d.a, What Is an Assistance Animal? section). As ESAs do not need to have special training, this differentiates them from service animals as service animals must be trained to "perform tasks for the benefit of an individual with a disability" (Brennan & Nguyen, 2014, Section III).

Two trends associated with ESAs include the increasing number of students with a disability (U.S. Department of Education, 2012; U.S. Department of Education, 2019) and the increasing number of students reporting decreasing emotional health (HERI, 2011). The number of students reporting a disability[2] went from 10% in 2007 (U.S. Department of Education, 2012) to 18% in 2017 (U.S. Department of Education, 2019). This is a percentage increase of 80% in the number of students reporting a disability. This change could be explained by the fact that older Millennials have a higher prevalence of physical health issues (Blue Cross Blue Shield [BCBS], 2019). Additionally, Generation Z members, who are beginning to arrive on campuses (Mintz, 2019), have the highest incidence of major depressive symptoms and psychological stress over prior generations (Twenge et al., 2019).

For students with physical or mental disabilities, there is antidiscrimination legislation which provides protections. This legislation applies "to all programs or activities that are recipients of federal financial assistance, including indirect funding

[2] See footnote 1.

through the student financial aid system" (McClellan & Stringer, 2016, p. 548). Two of these legislations that impacted disability services in higher education are Section 504 of the Rehabilitation Act of 1973 (Section 504) and the American with Disabilities Act of 1990 (ADA) (McClellan & Stringer, 2016). Section 504 (n.d.) states that "No otherwise qualified individual with a disability…shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (Section 794.(a)). "Only if a private postsecondary institution received no government funds would it be excluded from the provisions of section 504" (Huss, 2012, p. 422).

The other key antidiscrimination legislation providing protections for people with disabilities is the ADA. The ADA "is the nation's first comprehensive civil rights law addressing the needs of people with disabilities, prohibiting discrimination in employment, public services, public accommodations, and telecommunications" (U.S. Equal Employment Opportunity Commission [EEOC], n.d.). In response to the ADA, postsecondary institutions initially considered physical barriers to access and made changes such as building ramps, widening doorways, and modified furniture and equipment (Von Bergen, 2015). Beyond physical barriers, institutions needed to respond to student requests for auxiliary aids such as note takers or readers (U.S. Department of Education, 1998).

The ADA also states that service animals must be allowed "to accompany people with disabilities in all areas where members of the public are allowed to go" (U.S. Department of Justice [DOJ], 2011). A service animal is "any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability,

including a physical, sensory, psychiatric, intellectual, or other mental disability" (Brennan & Nguyen, 2014, section II). Furthermore, service animals are trained to behave flawlessly in public (Von Bergen, 2015).

While the ADA does not define or address ESAs, the Fair Housing Act (FHA) does. The FHA "prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status…, and disability" (HUD, n.d.b, Fair Housing Act section). Until clarification via litigation, many campuses did not view campus residences as being covered by the FHA. However, in *U.S.A. v. University of Nebraska at Kearny*, the court concluded that the FHA applies to students with a disability who have ESAs and live on college campuses.

"Since the first set of regulations, the agencies responsible for various aspects of disability discrimination law have provided not only many sets of regulations, but substantial regulatory 'guidance'" (Rothstein, 2018, p. 5). Litigation ensued when individuals believed regulation or guidance was not followed. Litigation responded to concerns in a variety of areas such as procedural and enforcement issues, definition and documentation issues, architectural barriers, accommodations, campus housing, ESAs and service animals, technology issues, and food sensitivities and allergies among others (Rothstein, 2018).

There are a number of ESA related litigations in higher education. One example is from 2005 when a student at Our Lady of the Lake University desired to bring her pet ferret on campus to provide support during panic attacks (Von Bergen, 2015). She filed a complaint with the DOJ when her request was denied by the university (Von Bergen,

2015). While the DOJ did not act on this grievance, the college "lost financially due to the incurred legal expenses" (Von Bergen, 2015, p. 18). In *U.S.A. v. University of Nebraska at Kearny*, "the U.S. District Court for Nebraska held that the residence halls at the University of Nebraska at Kearny are subject to the Federal Housing Act and its regulations" and must allow ESAs to live with students ("FHA permits", 2013, p. 9). A third example is from 2013 when "Grand Valley State University in Grand Rapids, Michigan, agreed to pay $40,000 in a settlement but admitted no wrongdoing in response to a lawsuit that accused it of violating a federal housing policy by initially denying a student's request to live with a guinea pig" (Taylor, 2016).

The regulations and resulting guidance from the DOJ and the U.S. Department of Housing and Urban Development (HUD) as well as litigation support the right of a student with a disability to have an ESA in campus housing regardless of the animal policy. In order to respond to ESA requests, institutions created new policies. Two themes emerged from the research literature for institutions to address in ESA policies, documentation and student responsibilities.

Regarding documentation, the courts clarified in *Alejandro v. Palm Beach State College* (2011) and *U.S.A. v. University of Nebraska at Kearny* (2013) that burdensome or overly intrusive information should not be asked of students requesting a reasonable accommodation for a service animal or an ESA. The documentation needs to be sufficient to assist "in approving legitimate ESA requests while disapproving those that fail to establish a disability or fail to show how the ESA will ameliorate the substantial limitations from a disability in a way that provides equal use and enjoyment of campus

housing" (Masinter, 2016, p. 4). The FHA requires the documentation "to be provided by a licensed health care or mental health care provider" (Chandler, 2019, p. 53).

Concerning student responsibilities, campus policy should "place the responsibility for supervising, controlling and caring for animals on the users" (Shackelford, 2013). Some responsibilities include the student adhering to "state and local requirements regarding vaccination, licensure, leash control, cleanup rules, animal health, etc." (NACAU, 2011, p. 8). Furthermore, students can be held responsible for fumigation expenses due to fleas and ticks (Masinter, 2015).

The enacted ESA policy contributes to staff experiences responding to ESA requests. For example, one challenge staff experience is evaluating letters supporting ESAs for students as there are Internet sites that for a fee will write someone a letter stating that the person has a disability and requires an ESA (Masinter, 2019). Staff also need to respond to situations when students take their ESA outside of their residence inappropriately such as to class. Additionally, the number of ESA requests staff receive is increasing (Bauer-Wolf, 2019).

Statement of the Problem

In response to the described trends, regulations, resulting guidance, and litigation, many higher education institutions have created and enacted ESA policies and procedures. Journals focusing on disability and legal issues frequently describe what should be in the policy. However, only one research study, with a sole focus of counseling centers, was located that examined what is occurring around policy enactment. The study by Kogan et al. (2016) surveyed university counseling centers to ask if the center had policies related to ESAs, whether those policies were working, and

whether staff write letters for students indicating the need for an ESA. Due to the lack of studies surrounding ESA policies, a void appears to exist as to what policies and procedures have been enacted about ESAs and the resulting staff experiences.

Theoretical Framework

In order to investigate this apparent void, the Centers for Disease Control and Prevention's (CDC) evaluation framework for policy evaluation was used. After an extensive review of the literature, the CDC framework best matched the intent of the study and provided the best framework for examining enacted ESA policies and resulting staff experiences in comparison to other possible frameworks. The CDC describes policy evaluation as applying "methods to examine the content, implementation or impact of a policy" (CDC, n.d.a, p. 1).

Commonly used today, the framework provides the structure for the CDC evaluation process (Kidder & Chapel, 2018). The CDC (2017a) describes the framework as "a practical, nonprescriptive tool, designed to summarize and organize essential elements of program evaluation" (para. 1). As the focus of this study was to examine enacted ESA policies and their resulting impact, using the CDC framework, which can have a policy focus, was appropriate as a theoretical framework for this study.

Research Questions

As this study examined what ESA policies institutions implemented, the resulting staff experiences, and the relationship between them, the research questions focused on these concepts. Possible enacted policy components were determined from the regulations, resulting guidance, litigation, and journal article recommendations. Potential

staff experiences were developed from litigation, governmental guidance, and journal articles.

R1: What is the relationship between enacted ESA policy and resulting staff experiences?

H_1: Enacted ESA policy impacts staff experiences.

H_0: Enacted ESA policy does not impact staff experiences.

R2: Which enacted policy components contributed to staff experiences?

H_1: There are specific enacted ESA policy components which impact staff experiences.

H_0: There are not specific enacted ESA policy components which impact staff experiences.

R3: What differences, if any, exist by institutional and respondent characteristics in regard to enacted policy components or resulting staff experiences?

H_1: Differences exist by institutional characteristics regarding enacted policy components.

H_0: No differences exist by institutional characteristics regarding enacted policy components.

H_2: Differences exist by respondent characteristics regarding enacted policy components.

H_0: No differences exist by respondent characteristics regarding enacted policy components.

H_3: Differences exist by institutional characteristics regarding staff experiences.

H_0: No differences exist by institutional characteristics regarding staff experiences.

H_4: Differences exist by respondent characteristics regarding staff experiences.

H_0: No differences exist by respondent characteristics regarding staff experiences.

Institutional characteristics included the size of the institution based on the Carnegie size classification, the institution category from the Pennsylvania Department of Education, the highest degree granted, the percent of students with a reported disability, the percent of students that are not Caucasian, and the county class (population grouping) of where the institution is located. Respondent characteristics included the person's role, self-rated knowledge of the campus's ESA policy, how frequently the respondent references the policy, and length of time in current position.

Definition of Terms

To ensure clarity in exploring the research questions, differences among the terms, ESAs, service animals, and pets, require precise definitions. Each of the categories while closely related, have significantly different legal contexts. The definitions that appear in this section are intentionally succinct as the beginning of Chapter II contains a fuller description of the terms and compares and contrasts ESAs with pets and service animals.

Disability - A person with a disability is "any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with

a record of such impairment; or (3) individual who is regarded as having such an impairment" (HUD, n.d.b, Who Is a Person with a Disability? section).

Emotional Support Animal – "Emotional support animals provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias, but do not have special training to perform tasks that assist people with disabilities" (Brennan & Nguyen, 2014, section III).

Implementation Evaluation – A purpose of implementation evaluation is "Documenting and comparing different intensities or variations of policy" (CDC, n.d.c, p. 1).

Impact Evaluation – A purpose when conducting an impact evaluation of policy is attributing outcomes to enacted policy (CDC, n.d.d). Another purpose of impact evaluation is "Demonstrating the impact of the policy, by measuring changes in short-term, intermediate and long-term outcomes" (CDC, n.d.d, p. 1).

Institutional Characteristics –Institutional characteristics included the size of the institution based on the Carnegie size classification, the institution category from the Pennsylvania Department of Education, the highest degree granted, the percent of students with a reported disability, the percent of students that are not Caucasian, and the county class (population grouping) of where the institution is located.

Pet – To be considered a pet, an animal is singled out by a human being for pleasure and companionship (Grier, 2006). A pet may also be referred to as a companion animal (Yamamoto & Hart, 2019).

Policy Enactment – Policy enactment, or policy content, "focuses on identifying the specific policy elements that are likely to be effective" (Brownson et al., 2009, p. 1579).

For the purposes of this paper, policy enactment focuses on what should be included in ESA policies based on the regulations, litigation, and resulting guidance.

Policy Implementation – Policy Implementation focuses on what happens after a policy is enacted. Examining policy implementation provides insight into the impact of the enacted policy (Brownson et al., 2009). For the purposes of this paper, policy implementation focuses on staff experiences.

Respondent Characteristics - Respondent characteristics included the person's role, self-rated knowledge of the campus's ESA policy, how frequently the respondent references the policy, and length of time in current position.

Service Animal - A service animal is "any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability" (Brennan & Nguyen, 2014, section II).

Limitations

Limitations of the study include the following:

- The sampling strategy was carried out to maximize obtaining a representative sample; however, that may not have occurred depending on the availability of contact information and which institutions responded to the survey (Linder et al., 2017). Thus, the responses may not fully represent the desired population.
- The survey was a self-report of the policy components and staff experiences. As such, there is a possibility that respondents indicated their policy contained a particular component when it did not (Linder et al., 2017) which could have altered the results of the study.

- The enacted policy may not be followed which could impact staff experiences (CDC, n.d.d), thus altering the results of the study.

Summary

Student requests to have ESAs in campus housing is increasing (Bauer-Wolf, 2019). In addition, regulations and litigation have clearly stated that an ESA is a reasonable accommodation for students in campus housing. In response, many higher education institutions have created and enacted ESA policies and procedures. What is not clear is what is included in the policies and procedures and the resulting staff experiences.

Chapter II: Literature Review

Policy development typically involves the stages of problem identification, policy analysis, strategy and policy development, policy enactment, and policy implementation (CDC, n.d.a). These policy development stages are adapted to review the context and literature related to emotional support animal (ESA) policies on college campuses. As an introduction, the different categories of animals are reviewed which will aid in the reading of the other sections.

Animal Category Definitions

As the number of students requesting to have an animal on campus is increasing, one should understand the differences between ESAs, service animals, and pets. Each of the categories are closely related, but have significantly different legal contexts that need understood in order to respond within the legal requirements to each type of request. The order for defining each type of animal is based on the amount of regulation related to the particular classification of animal. The hierarchy of categories from little regulation to significant regulation is: pets, ESAs, and service animals. Each of these is defined along with pet therapy and therapy animals which fall between pets and ESAs regarding the amount of regulation.

Pet

A pet is singled out by a human being for pleasure and companionship (Grier, 2006). A pet may also be referred to as a companion animal (Yamamoto & Hart, 2019). The majority of institutional policies prohibit pets from living in residence halls. Common reasons for prohibiting pets in residence halls include: students with allergies to animals, students with fears of animals, the damage animals may cause to the residence

halls, the animals being neglected or abandoned, and the health and safety of the students (Hoover, 2003). However, about four percent of colleges and universities do allow pets on campus (Nova, 2018).

Animal-Assisted Activity

What most people refer to as pet therapy is actually considered an animal-assisted activity (AAA). The sessions "typically include brief meet-and-greet sessions where animals spend some time with specialized populations including sick children, geriatric patients, and college students" (House et al., 2018, p. 200). An AAA consists of a "human-animal team for motivational, educational and recreational purposes. There are no treatment goals for interactions" (International Association of Human-Animal Interaction Organizations [IAHAIO], 2014, p. 5). The human-animal team is typically composed of a volunteer, the human, and the volunteer's pet which is frequently a dog (Caring Hearts Pet Therapy, 2015).

Animal-Assisted Therapy

An AAA is often confused with animal-assisted therapy (AAT). AAT "is a goal directed intervention in which an animal meeting certain criteria is an integral part of the treatment process" (American Veterinary Medical Association [AVMA], n.d., para. 5) which is "delivered by health, education and human service professionals" (IAHAIO, 2014, p. 5). Examples of AAT include psychologists who use an animal to help calm patients during therapy sessions or a physical or occupational therapist who utilize an animal to facilitate patient exercises. AAT would not typically occur on a college campus unless a professional counselor was using the animal in providing services to students.

Emotional Support Animal

"Emotional support animals provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias, but do not have special training to perform tasks that assist people with disabilities" (Brennan & Nguyen, 2014, section III). "ESAs are not legally required to do work or perform tasks for their partners" (Yamamoto & Hart, 2019, p. 81). Often, ESAs assist people with disabilities by reducing anxiety for them (Yamamoto & Hart, 2019). ESAs can also help a person "cope with emotional symptoms associated with…depression, and post-traumatic stress" (Adams et al., 2017, p. 312). An ESA can be virtually any species of animal (Masinter, 2013).

Service Animal

A service animal, as defined by the American with Disabilities Act (ADA), is "any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability" (Brennan & Nguyen, 2014, section II). In addition to a dog, a miniature horse can also be a service animal (DOJ, 2011). "Service animals must generally be provided access to all campus locations" (Von Bergen, 2015, p. 20). In addition, "Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals" (DOJ, 2011, Inquiries, Exclusions, Charges… section).

Emotional Support Animal versus Service Animal

The main difference between a service animal and an ESA is that a service animal has training and an ESA may not (Kogan et al., 2016). The difference between a psychiatric service animal and an ESA becomes even more confusing as a psychiatric

service animal can also serve as an ESA (Tedeschi et al., 2015). However, an ESA cannot serve as a psychiatric service animal as by definition an ESA does not have training (Tedeschi et al., 2015). Another important difference between service animals and ESAs is that ESAs are not defined by the ADA and as such the ADA does not apply to ESAs (Von Bergen, 2015). However, the Fair Housing Act (FHA) does apply to ESAs (Von Bergen, 2015). This difference also creates a difference regarding where each category of animal is allowed. Under the ADA, service animals are generally allowed in all campus locations, however ESAs are generally only allowed in campus housing as that is where the FHA applies (Von Bergen, 2015). A similarity between service animals and ESAs is that both "Must be under effective controls at all times" (Kogan et al., 2016, p. 273).

Emotional Support Animal versus Pet

ESAs may be considered pets by their owners, but not all pets can be considered ESAs. A pet is only considered an ESA if the animal provides "emotional support that alleviates one or more identified effects of a person's disability" (HUD, n.d.a, What Is an Assistance Animal? section). "An ESA is not only a pet, but is also viewed as an animal that provides emotional support and/or therapeutic benefit to an individual with a verifiable mental or psychiatric disability" (Kogan et al., 2016, p. 271). In regard to legal protections, the FHA only applies to ESAs and as such institutions can legally prohibit students from having pets on campus.

Problem Identification

Problem identification is "how certain problems or conditions come to be regarded as problems worthy of governmental intervention" (Brownson et al., 2009, p. 1578). For the purpose of this study, problem identification consists of the trends of

students reporting decreasing emotional health (HERI, 2011) and the increasing number of students with disabilities. Without these trends, the number of ESA requests on campus would be minimal which would minimize the need for ESA policies. Physical and mental health trends are examined first by generation and then by trends over time.

Generational Trends

Millennials, those born between 1981-1996 (Pew Research Center, 2018) have left college campuses (Mintz, 2019). This means that Generation Z, those born 1997 and later (Pew Research Center, 2018), are arriving on campuses (Mintz, 2019). As such, examining health trends for these two generations is appropriate to understand possible influences on the health and disability trends campuses are experiencing.

A physical health trend that has been identified for Generation Z is that their life expectancy at birth has decreased slightly over the past few years (Centers for Disease Control and Prevention [CDC], 2018). This is the first generation that has not seen their life expectancy at birth increase over time (CDC, 2018). Millennials also differ from previous generations as "older millennials (age 34-36) have higher prevalence rates for nearly all of the top 10 conditions[3] than did Generation X members[4] when they were in the same age range (age 34-36)" (Blue Cross Blue Shield [BCBS], 2019, para. 2). In comparison to Generation X members, Millennials "have a higher prevalence of physical conditions, particularly cardiovascular disease and endocrine conditions, including diabetes" (BCBS, 2019, Exhibit 4).

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[3] The top 10 conditions include major depression, substance use disorder, alcohol use disorder, hypertension, hyperreactivity, psychotic conditions, Crohn's disease/ulcerative colitis, high cholesterol, tobacco use disorder, and type II diabetes (BCBS, 2019).

[4] Those born between 1965 and 1980 (Pew Research Center, 2018).

In regard to psychological trends, Twenge et al. (2019) examined the prevalence of mood disorder, major depressive symptoms, and suicide-related outcomes (thoughts, plans, attempts) by using a new statistical procedure called age-period-cohort analysis. "This relatively new statistical technique uses hierarchical linear modeling to separate the effects of age, time period, and cohort/generation" (Yang & Land as cited in Twenge et al., 2019, p. 186). This type of analysis examines whether trends are due to the aging process of individuals, period effects "that equally affect all age groups at a particular calendar time [or cohort effects which is from]…variations resulting from the unique experience/exposure of a group of subjects (cohort) as they move across time" (Columbia University Mailman School of Public Health, n.d., Description section).

In regard to serious psychological distress in the past month, the study by Twenge et al. (2019) found that Baby Boomers[5] and Generation Z had a higher incidence than the other generations and that the incidence has been increasing since the early 1980 birth years. For major depressive symptoms, a trend was seen in adolescents due to time period and for adults the trend was a cohort effect with Generation Z adults having the highest incidence of depressive symptoms (Twenge et al., 2019). The analysis for suicide-related outcomes "showed that the increase was primarily due to cohort" (Twenge et al., 2019, p. 191). "The results suggest that cultural trends in the last 10 years may have had a larger effect on mood disorders and suicide-related outcomes among younger people compared to older people" (Twenge et al., 2019, p. 194). One of the many concerns with this finding is that given the earlier onset of mood disorders, Generation Z may have greater odds of chronic psychological issues (Twenge et al., 2019).

[5] Those born between 1946 and 1964 (Pew Research Center, 2018).

Twenge et al. (2019) discuss multiple reasons why the rise in incidence for Generation Z is occurring. Possible reasons include later generations being more willing to admit mental health issues, increased opioid use, increased use of electronic communication and digital media, and the trend of decreasing sleep duration among U.S. adolescents (Twenge et al, 2019). The study concluded that psychological trends "are weak or nonexistent among adults 26 years old and over, suggesting a generalized shift in mood disorders and suicide-related outcomes rather than an overall increase across all ages" (Twenge et al., 2019, p. 185). In other words, there are increasing psychological trends of concern for Generation Z who are now beginning to attend college (Mintz, 2019).

Trends Over Time

Up to this point, physical and mental health trends have been examined by generation. However, there is also utility in examining trends over time. For example in 2007, 10% of all college students reported having a disability (U.S. Department of Education, 2012). A decade later in 2017, 19% percent of undergraduate students and 12% of graduate students reported having a disability which is 18% of all higher education students (U.S. Department of Education, 2019). This represents a percentage increase of 80% in the number of students reporting a disability. The most frequently reported disability is a learning disability followed by attention-deficit disorders, and then mental illness (Raue & Lewis, 2011).

As an ESA can support a person's emotional well-being and decrease anxiety (Yamamoto & Hart, 2019), focusing on the number of students that reported having anxiety is worthwhile. In 2018, 63.5% of college students reported having overwhelming

anxiety (American College Health Association [ACHA], 2018). This represents a 50.6% increase from 2011 (ACHA, 2011). However, how students defined overwhelming anxiety lacked clarity. Therefore, the percentage of college students diagnosed with or treated by a professional for anxiety is a more accurate number to consider in regard to estimating the number of students that may have a disability related to anxiety. In 2018, 22.1% of college students reported being diagnosed with or being treated for anxiety (ACHA, 2018) which is a percentage increase of 90% from 2011 when 11.6% of students reported being diagnosed with or being treated for anxiety (ACHA, 2011).

While about 20% of college students may be diagnosed with or treated for anxiety, that does not mean that their anxiety creates an impairment in functioning. In regard to academic performance, there was an increase from 7.1% of students in 2011 (ACHA, 2011) to 10.6% of students in 2018 (ACHA, 2018) reporting an impact on their academic performance due to anxiety. Students reported that their anxiety impacted them to the point that they received lower course grades, received an incomplete, or dropped a course (ACHA, 2018). The number of students who reported that anxiety impacted their exam score was 12.0% in 2011 (ACHA, 2011) and 15.8% in 2018 (ACHA, 2018).

Problem Identification Summary

These trends are significant as they provide evidence that the physical and mental health of Millennials and Generation Z are decreasing. In addition, the increasing number of students with anxiety and stress is concerning as stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). As one benefit of ESAs is reduced anxiety (Yamamoto & Hart, 2019), students with anxiety may request to have an ESAs to assist them with their disability.

Policy Analysis

Within the context of public health policy development, policy analysis refers to alternative practices that can address the issue (Brownson et al., 2009). For the purposes of this paper, policy analysis examines the benefits of the human-animal bond and the surrounding controversy. Controversial aspects about the benefits of ESAs are reviewed first followed by a discussion of the human-animal bond.

Benefit Controversy

Some people believe there are other ways to treat a person's disability other than with an ESA such as with medication and therapy (Phillips, 2016). However, for Jacob Gamble, his ESA, a pig named Ruxin, works better than medication and therapy (Harshman, 2016). Phillips (2016) contends that only using treatments other than ESAs is often a "misguided conception that comes from misinformation and a lack of education on mental health and disabilities" (p. 97).

For example, Herring (2017) contends that all students have anxiety, particularly test anxiety, and that having an ESA to alleviate the problem is "laughable" (p. 58). From Phillips' (2016) perspective, Herring indicates a lack of education about anxiety as a disability. Consider that a student with an anxiety disability has an impairment in functioning which means the student "requires services or accommodations not typically made for other individuals" in regard to areas such as work, school, relationships, and communication (State of Connecticut, Department of Social Services, n.d.). This does not describe a student who is only anxious about taking tests. Rather, a student who struggles controlling his or her anxiety and staying focused on daily tasks is described (National Institute of Mental Health, 2016). A Miami University freshman, Angela Ackerman,

finds her ESA, a dog named Raven, helps her to get focused, relax, and be in a better mood (Clark, 2017).

Controversy also surrounds ESAs as some argue the research is not conclusive that animals are helpful to humans (Brulliard, 2017). One reason for this perspective is that generally studies lack scientific control and rigor (Martin & Farnum, 2002). For example, in conducting a systematic review of companion animals and loneliness, Gilbey and Tani (2015) only found three randomized controlled studies and the methodological quality was low in each. Out of 18 studies included in their review, Gilbey and Tani concluded that only one study was not underpowered.

The Human-Animal Bond

The literature about the human-animal bond related to ESAs is limited (Yamamoto and Hart, 2019). This was confirmed when searching for research investigating the benefits of ESAs. Using the search terms of emotional support animal or emotional support animals, and benefits or advantages or positive effects or importance or impact, less than 300 results were returned. While a number of results investigated the impact of service or companion animals, i.e. pets, no research articles were found that reported on ESA impacts. As such, research about companion animals is examined as "some benefits of companion animals would also apply to ESAs" (Yamamoto and Hart, 2019, p. 81). In addition, AAA literature focused on college students is reviewed as the "reported psychological effects…may also be provided by ESAs" (Yamamoto and Hart, 2019, p. 90).

Pets. The human relationship with dogs can be traced back to ancient times and in various cultures worldwide as a partner in human survival, health, and healing (Walsh, 2009). For example, dogs are mentioned in Chinese legend and treated with respect in Egypt (Walsh, 2009). In ancient Greek and Roman empires, Coren describes how dogs were not only working dogs, but also beloved pets (as cited in Walsh, 2009). Dogs have served many purposes, "but perhaps the main one has always been to provide companionship and to increase personal status of the owner at home or in the hunt" (Clutton-Brock, 1995, p. 18). Dogs are considered special due to their displays of affection; loyalty and devotion to their human companions; lack of speech which means they cannot offer advice, judgement, or criticism; and ability to play (Hart, 1995).

Pets in today's society are commonplace as there are over 393 million pets in the United States, of which over 183 million are cats or dogs (American Pet Products Association [APPA], n.d.). National surveys by the American Pet Products Association (APPA) (n.d.) show an increase from 56% of U.S. households owning a pet in 1988 to 68% in 2017 which equates to about 84.6 million homes with a pet. In 2016, $66.75 billion was spent on food, medication, supplies, veterinary care, live animal purchases, and pet services such as grooming and boarding for pets in the United States (APPA, n.d.).

"Pet ownership has been associated with higher levels of physical activity, lower blood pressure, diminished responses to stress, improved lipoproteins and a reduced incidence or severity of depression" (Arhant-Sudhir et al., 2011, p. 734). In a 10-month prospective study with 71 adult pet owners and a comparison group of 26 non-pet

owners, Serpell (1991) found that pet owners had beneficial changes in health and behavior that non-pet owners did not have.

Petting a dog may also positively impact the immune system. Charnetski et al. (2004) compared Immunoglobulin A (IgA)[6] secretion in three groups: 1) sit quietly on a couch and pet a Shelti dog that was next to them, 2) sit quietly on a couch, or 3) sit quietly on a couch and pet a stuffed replica similar to the Shelti dog. Fifty-nine undergraduate students participated, were randomly assigned to one of the three groups, and completed the Pet Attitude Scale (Charnetski et al., 2004). There was a significant increase in IgA levels in the dog petting group (Charnetski et al., 2004). A correlation was noted between the students petting a stuffed animal and the Pet Attitude Scale suggesting that those with a more positive attitude towards pets may benefit from interaction with a stuffed animal (Charnetski et al., 2004).

Pet ownership has also been shown to buffer stress responses over that of a friend or spouse. The study by Allen et al. (2002) compared 120 heterosexual married couples, half of whom owned pets, to determine if "pet owners differ in cardiovascular basal or resting activity, reactivity to demanding task performance, and recovery from task performance levels compared with non-pet owners" (p. 728). For the couples that did not own a pet, each person was asked to invite a close same-sex friend that could participate in the experiment (Allen et al., 2002). Allen et al. found that pet owners had a lower resting heart rate and blood pressure; had smaller increases in reactivity due to a stressful

[6] IgA is an antibody that is present in all body secretions "and is the major antibody in the mucous membrane lining the intestines and in the bronchi, saliva, and tears" (Mosby's Medical, Nursing, & Allied Health Dictionary, 1994).

event of mental arithmetic or having a hand placed in ice water when a pet was present; and they recovered faster after a stressful event when a pet was present.

In regard to cardiovascular health in what Walsh (2009) considers a landmark finding, Friedmann et al. (1980) studied the one-year survival rate of 92 people with a myocardial infarction or angina pectoris in relation to the effects of social isolation or support. Friedmann et al. concluded that "social variables such as pet ownership can add significantly to the variance in survival explained by the severity of the cardiovascular disease" (p. 310). In a similar study with 369 patients who were part of the Cardiac Arrhythmia Suppression Trial (CAST), Friedmann and Thomas (1995) found that "dog ownership and social support made significant independent contributions to survival beyond the effects of the physiological measures of the severity of the cardiovascular disease…Dog ownership and amount of social support were independent predictors of survival" (p. 1216).

Two possible explanations for the cardiovascular benefits of owning pets, in particular dogs, are an increase in physical exercise due to walking the dog and the effect from touching a dog. Serpell (1991) found in a 10-month prospective study with 71 adult pet owners and a comparison group of 26 non-pet owners that one of the main factors that differentiated pet owners and non-pet owners was an increase in physical exercise from walking. To determine if a decrease in blood pressure is a result of being in the presence of a dog, talking to a dog, or touching a dog, Vormbreck and Grossberg (1988) recruited 60 undergraduate students who scored as dog lovers or dog neutral on the Pet Attitude Scale. The experiment consisted of the student's blood pressure and heart rate being taken in six conditions: 1) touching the dog, 2) talking to the dog, 3) touching and talking

to the dog, 4) talk with the experimenter with the dog present, 5) talk with the experimenter with the dog absent, and 6) sit and relax in silence (Vormbreck & Grossberg, 1988). The study found that "Resting and touching the dog were associated with the lowest BP [blood pressure] levels in the subjects, regardless of subjects' past exposure to dogs" (Vormbreck & Grossberg, 1988, p. 515).

There are also mental health benefits such as decreased loneliness, anxiety, depression, and stress (Friedmann & Thomas, 1985). One reason for these mental health benefits may be due to the non-judgmental nature of dogs "and the inability of the animal to bargain for its love [which makes]…relationships with pets less threatening than contact with people" (Friedmann & Thomas, 1985, p. 198). Socialization is one way to decrease loneliness. Mugford concluded that "the practical outcome of pet ownership, particularly ownership of dogs, is to increase the owners' extraversion and so promote social interactions within both the home and the community" (as cited in Hart, 1995, p. 167). Anthropomorphism, "defined as the 'attribution of human mental states (thoughts, feelings, motivations and beliefs) to nonhuman animals'" (Serpell, 2003, p. 83), provides a rationale for how humans experience socialization through animals. Serpell (2003) concluded that "anthropomorphism has provided the opportunity to use animals as alternative sources of social support and the means to benefit emotionally and physically from this" (p. 94).

McConnell et al. (2011) conducted two web-based survey research studies with community members and a third in-person study with undergraduate students to determine if pet ownership fulfills social needs. The studies by McConnell et al. found that: 1) pet owners had a greater well-being outcome measure than non-pet owners, 2) pet

owners “whose dogs filled social needs more effectively” (p. 1248) had a more pronounced well-being outcome measure, and 3) “one’s pet can offset negativity resulting from a rejection experience” (p. 1250). Pet ownership has also been shown to be beneficial for college students. College student pet owners were found to have higher empathy and interpersonal trust scores than non-pet owners (Hyde, Kurdek, & Larson, 1983).

Bolin (1987) found that recently widowed women who owned pets did not report an increase in despair, social isolation, or death anxiety after the death of their spouse whereas non-pet owners did. Bolin concluded that “the comfort and nurturing that a pet affords may have a mediating and therapeutic effect on the health of the widow” (p. 29). Depression may also be mitigated by pet ownership. In a national probability sample of Americans 65 or older, “strong attachment to a pet was associated with less depression” (Garrity et al., 1989, p. 41).

There are potential concerns with pet ownership. Pet ownership may place the owner at risk due to the transmission of diseases, allergic responses, or bites and scratches (Friedmann et al., 2015). New pet owners may be unprepared for the time and money investment that is required (Case as cited in Hart, 1995) and may not carefully match the new pet to their lifestyle (Hart, 1995). With over 68% of U.S. households having a pet in 2017 (APPA, n.d.), these risks do not seem to pose a concern or be a deterrent to many pet owners.

While the studies about pet ownership may not meet the definition of true experiments as there is no random assignment and participants self-select to own a pet and participate in research studies, there is still a preponderance of evidence that there are

benefits to pet ownership. Pets may impact an owner's physical health by positively impacting the immune system (Charnetski et al., 2004), buffering stress (Allen et al., 2002), and improving the survival rate of people diagnosed with cardiovascular disease (Friedmann et al, 1980; Friedmann & Thomsa, 1985). From a mental health perspective, pets may fulfill social needs (Serpell, 2003; McConnell et al., 2003), increase empathy and interpersonal trust (Hyde et al., 1983), buffer grieving of a spouse (Bolin, 1987), and mitigate depression (Garrity et al., 1989).

Animal-Assisted Activities. As the research about ESAs is limited and AAAs may provide similar psychological effects as ESAs (Yamamoto and Hart, 2019), the research about the benefits of AAAs for college students is reviewed. The benefits can be divided into the following categories: decreasing stress; decreasing test anxiety; and improving wellness which here includes anxiety, loneliness, and homesickness.

Stress. "The negative effect of stress on physical and psychological health outcomes in university and college students has been well documented" (Fiocco & Hunse, 2017). The results of a survey of 145 college students suggested "a relationship between perceived levels of stress among college students, their health habits, health status and self-esteem" (Hudd et al., 2000, p. 217). Health habits were described as reduced sleep, erratic eating habits and eating junk food (Hudd et al., 2000). Stress can also impact academic success as students with less stress typically receive higher grades (Stupnisky et al., 2013). The research is not clear on whether perceived stress by college students leads to stress related illness. However, the findings by Hudd et al. (2000) are sufficient reason to consider stress management techniques such as AAAs for college

students, especially since there is a growing body of literature that supports the benefits of AAAs in decreasing stress for college students.

A decrease in stress can be measured using blood pressure, various chemicals in saliva, or stress survey inventories. Delgado et al. (2017) evaluated stress by measuring blood pressure, cortisol levels in saliva, and results of a modified Perceived Stress Scale with 48 college students by measuring the items before and after one-to-one interaction with a dog. "The results of the study support that interactions with dogs can moderate the effects of stress in college students during a stressful time" (Delgado et al., 2017, p. 4). A limitation of the study by Delgado et al. is that most AAAs on college campuses happen in group settings, not as one-to-one sessions with a dog.

In a group AAA, Barker et al. (2017) evaluated the benefit of AAAs for college students by randomly assigning 74 students to either participate in an AAA session first and then complete the Family-Life Space Diagram or vice versa. The results suggested that group AAAs "may increase students' ability to cope with personal stressors and perhaps parental stressors as well" (Barker et al., 2017, p. 603). Although the study by Barker et al., did not have a comparison group, a strength was that there was randomization.

The strengths of the study by Dell et al. (2015) include: a large sample size (403 people completed questionnaires of which 90% were students); quantitative and qualitative data collection; and a follow-up questionnaire three months after the initial event. The purpose of the "study was to evaluate the SJA [St. John Ambulance] Therapy Dog program at three university campuses in Canada during a final examination period" (Dell et al., 2015, p. 338). As this was a pilot study and the intent was to determine the

success of the program, the survey asked questions about whether after the sessions people felt more relaxed and less stress, why they attended the event, and how they would describe their experience (Dell et al., 2015). Dell et al. concluded that the AAA sessions decreased stress as the students found support from the animals. “Support is understood as destressing and relaxing by interacting with the dogs and to a lesser extent the handlers” (Dell et al., 2015, p. 354).

While the three previously mentioned studies about AAAs for college students have each had their strengths, none had a true control group such as reading quietly to compare to a treatment group exposed to a dog. In pre and post measures of the Perceived Stress Scale in comparison to a control group, Binfet (2017) found that a single 20-minute group session of an AAA can significantly decrease perceived stress in first-year undergraduate students. The study was a randomized controlled trial with students being randomly assigned to either the treatment group, which participated in an AAA visit, or the control group, which had students study information from a course they were currently taking (Binfet, 2017). A strength of the study is that the design was a randomized controlled trial; however the control condition could have been enhanced by having students read quietly rather than study which may have created stress, thereby exaggerating the stress benefits.

Investigating both physiological and psychological stress, Crump and Derting (2015) found that psychological, but not physiological stress decreased in first-year female undergraduate students. A crossover design was used in the first part of the study where 27 participants were randomly assigned to participate in either the treatment condition, an AAA session, or the control condition, a non-stressful activity such as

reading or listening to music, first (Crump & Derting, 2015). As the order of the treatment was not significant in the first part of the study, the second part consisted of 61 participants being randomly assigned to either the treatment condition, an AAA session, or the control condition to participate in coloring or drawing (Crump & Derting, 2015). While Crump's and Derting's findings support the improvement of perceived psychological stress from an AAA session, a decrease in physiological stress, such as found by Delgado et al. (2017), was not supported.

The findings of decreased psychological stress, but no change in physiological stress was also found by Barker et al. (2016). The design was a randomized crossover study where 78 undergraduate students were randomly assigned which group they would participate in first; the treatment group, an AAA session, or control group, where they completed the Family-Life Space Diagram (Barker et al., 2016). Prior to randomization, after participating in the first group, and after participating in the second group, students completed the Perceived Stress Scale, Stress Visual Analog Scale, and had saliva taken to measure for salivary nerve growth factor and salivary alpha amylase (Barker et al., 2016). "The results provide evidence of a statistically and practically significant reduction in perceived student stress following a brief therapy-dog intervention" (Barker et al., 2016, p. 43).

The studies thus far have focused on whether perceived stress and physiological indicators of stress decrease after an AAA visit. Fiocco and Hunse (2017) took a different approach and wanted to determine if an AAA prior to a stress response would lessen the impact of a stress response. Sixty-one students were randomly assigned to either the treatment group, interaction with a dog in a seated position for 10 minutes, or the control

group, relax in a seated position for 10 minutes (Fiocco & Hunse, 2017). Participants completed the Perceived Stress Scale, the Positive and Negative Affect Schedule, and had their galvanic skin response read via elctrodermal activity at baseline, after completion of the treatment or control condition, and after the stressful event (Fiocco & Hunse, 2017). The stressful event was completion of the Paced Auditory Serial Addition Task (PASAT) which has "been shown to reliably induce a stress response" (Fiocco & Hunse, 2017, p. 4). Fiocco and Hunse stated that this "is the first study to show that interacting with a therapy dog for as little as 10 min may significantly buffer the stress response to a subsequent stressor" (Fiocco and Hunse, 2017, p. 7).

Shearer et al. (2016) randomly assigned 74 students to either treatment A, a mindfulness intervention; treatment B, time with a dog in a group setting; or the control condition where students were asked to complete the same questionnaires at the same times the treatment groups were held. Measures included in the study were the Spielberger State-Trait Anxiety Inventory, the Positive and Negative Affect Schedule, the Beck Depression Inventory, the Five Fact Mindfulness Questionnaire, and heart rate variability to measure stress adaptability (Shearer et al., 2016). The mindfulness intervention group showed a significant decrease in anxiety, less dysphoric affect, and a more adaptive response to stress than the control group while the dog group had a significant decrease in anxiety and less dysphoric affect and no difference in regard to adaptive response to stress in comparison to the control group (Shearer et al., 2016).

Even though the study by Shearer et al. (2016) provides evidence that mindfulness is beneficial and claims that in comparison to an "active, ecologically valid control intervention" there was a significant reduction in subjective stress (Shearer et al.,

2016, p. 250), the implementation of the dog group is questionable. Shearer et al. state that “a therapy dog” was brought into the room (p. 241). In other studies evaluating AAAs, multiple dogs were used if a group of students were interacting with the dogs at the same time. Also, there is not clarity if the dog was certified as an AAA dog. AAA studies typically indicate if the dog is certified, or at least evaluated to be friendly, and sometimes include how long the dogs have been involved with AAAs. In addition, Shearer et al. did not mention whether the handler was present, only that a facilitator was present. Not having a clear picture of how the AAA was implemented creates challenges in fully accepting the conclusion that a mindfulness intervention had a significant effect on decreasing anxiety, a less dysphoric affect, and a more adaptive response to stress than an AAA intervention.

While each of the studies reviewed about AAAs decreasing stress in college students have different methods and procedures, there is a preponderance of evidence that AAAs can decrease perceived stress for college students. There is contradictory evidence as to whether AAAs can decrease physiological stress as some studies provided evidence that AAAs do decrease physiological stress (Delgado et al., 2017) and others found no such evidence (Barker et al., 2017; Crump & Derting, 2015).

Test anxiety. As test anxiety has been shown to have a significant inverse relationship with grade point average (Chapell et al., 2005), finding ways to assist students to deal with test anxiety may help improve academic performance. “Regardless of the fairness and appropriateness of an exam and a student’s motivation to do well on it, TA [test anxiety] may be severe enough to impair exam performance in some students” (Broderson, 2017, p. 135). In a qualitative interview, a staff person who arranges AAAs

for a campus described how an AAA seemed to increase exam scores for a group of students (King, 2017).

Young (2012) measured text anxiety with the Spielberger Test Anxiety Index. Both the control group and the treatment group, who interacted with the researcher's dog as they wished on the days of scheduled exams, showed a decrease in test anxiety, but the results were not statistically significant (Young, 2012). However, anecdotal evidence was included from students as to how interacting with the dog prior to taking an exam improved their grades (Young, 2012).

Wellness. Studies evaluating anxiety or loneliness for college students and AAAs often investigated these feelings at the same time. Therefore, anxiety and loneliness are grouped together under the heading of Wellness.

Binfet and Passmore (2016) found that AAA visits for 45 minutes over eight weeks for 44 undergraduate students self-identified as feeling homesick improved homesickness ratings and satisfaction with life. The study design included random assignment to either a treatment condition, the AAA, or a control condition, a waitlist for participation in an AAA session (Binfet & Passmore, 2016). Students in the treatment group also reported feeling a connection to others that participated in the AAA and that they met other students they would not have otherwise met (Binfet & Passmore, 2016). Students in the control group actually reported an increase in homesickness feelings by the end of the study (Binfet & Passmore, 2016).

Stewart et al. (2014) found a significant decrease in self-reported anxiety and loneliness in 55 undergraduate students after attending an AAA session in a pre-post test design. Crossman et al. (2015) found similar results in a randomized controlled trial with

67 students or residents at a School of Medicine as there was a significant decrease in anxiety and negative mood and an increase in positive mood. In addition to anxiety and mood inventories which occurred pre and post intervention, participants were also asked about their expectations of the intervention, attitudes toward the intervention, and experiences with dogs prior to the intervention (Crossman et al., 2015). Participants were assigned to one of three conditions: 1) experimental where they had one-on-one time with a dog supervised by the handler, 2) no-interaction control where they looked at pictures of the same dog in the experimental condition, and 3) a no-treatment control (Crossman et al., 2015). Participants participated in the experimental and no-interaction control conditions for at least 7 minutes (Crossman et al., 2015). Participants that were assigned to the no-interaction and no-treatment control groups were offered the opportunity to interact with the dog after they were debriefed (Crossman et al., 2015). In regard to prior experiences with dogs and expectations and attitudes toward the intervention, "The effects we observed were not limited to those with experience with dogs or greater expectations regarding the effectiveness or credibility of the therapy dog" (Crossman et al., 2015, p. 656).

Muckle and Lasikiewicz (2017) used a quantitative quasi-experimental design to determine if an AAA session could decrease anxiety in 62 undergraduate Singaporean Chinese students. Although two groups were compared, the students were not randomly assigned to a group. The treatment group participated in an AAA session while students in the comparison group read quietly. The comparison group was a subset of the students that participated in an AAA session which occurred on different days than the AAA and in a counterbalanced order (Muckle & Lasikiewicz, 2017). Students in the treatment

condition had a significant decrease in anxiety in comparison to students in the control condition (Muckle & Lasikiewicz, 2017)

Adamle et al. (2009) concluded in their study about a pet therapy program for college freshmen that "pet therapy may be a catalyst to establish new social relationships among college students" (p. 547). The results of these studies demonstrate that AAAs could be used to support social connections for college students. In addition, AAA anecdotally helps with test anxiety (Young, 2012). AAAs may also help college students deal with stress and loneliness (Stewart et al., 2014).

Mental health problems such as depression "can affect all aspects of the student's physical, emotional, cognitive, and interpersonal functioning…[and] may also have a negative impact on academic performance, retention, and graduation rates" (Kitzrow, 2009). Sanford (2015) found in 14 undergraduate students that depression symptoms, as measured by the Counseling Center Assessment of Psychological Symptoms-34 (CCAPS-34) Version 2009, decreased after weekly one-on-one interactions with a dog. Students involved in the study were provided a training on how to interact with a dog and were able to take a dog out of the study area for the session (Sanford, 2015). While the sample size was small and a group setting was not used, this study suggests that AAAs may decrease depression symptoms in college students.

Animal-Assisted Activities Summary. There is a body of literature that supports that AAAs can help decrease stress and improve wellness in college students. While each of the studies reviewed about AAAs and college students has different strengths, limitations, methods, and procedures, there is a preponderance of evidence that AAAs can decrease perceived stress for college students (Binfet, 2017). While there is not

empirical evidence that AAAs decrease test anxiety, there is anecdotal evidence (Young, 2012). AAAs have also been shown to be a catalyst for new social connections (Adamle et al., 2009), a way to decrease anxiety and loneliness (Stewart et al., 2014) and possibly a way to decrease depression symptoms (Sanford, 2015).

Policy Analysis Summary

Two controversies about ESAs is that one can pursue other treatment options other than using an ESA to assist with a disability (Phillips, 2016) and that the research is not conclusive that animals are helpful to humans (Brulliard, 2017). In regard to the treatment options, Phillips (2016) argues that the controversy is due to a "misguided conception that comes from misinformation and a lack of education on mental health and disabilities" (p. 97). While the studies about the benefits of pet ownership and AAAs each have different strengths, limitations, methods, and procedures, there is a preponderance of evidence that people experience benefits from the human-animal bond.

Strategy and Policy Development

This stage of the policy development process is referred to by Brownson et al. (2009) as politics. This stage is when "factors both inside and outside government…influence the policymaking process" (Brownson et al., 2009, p. 1578). When new regulations and court decisions are being made, one could argue that factors within government, such as current laws, are considered. In addition, new beliefs and the current norms of society, those things outside of government, are also considered. As such, for the purposes of this paper, the policy development stage of strategy and policy development examines the various acts and litigation related to ESAs and campuses.

From a legal perspective, recent regulations related to fair access, employment, and housing for people with disabilities mention ESAs and limit what questions an institution can ask about the disability. The main regulations to consider are the ADA, Section 504 of the Rehabilitation Act, and the FHA. In addition, there have been a number of legal cases involving students challenging decisions by institutions denying student requests to have ESAs on campus. These legal cases provide additional guidance for institutions in regard to ESAs.

Regulations

While the FHA was initially passed in 1968 prior to the ADA and Section 504 of the Rehabilitation Act, for the purposes of this discussion, the ADA will be discussed first, followed by Section 504 of the Rehabilitation Act, and then the FHA. The reasoning for this order, rather than using a date order, is that the ADA defines service animals, but not ESAs. However, an understanding of service animals as defined by the ADA is needed to fully understand how Section 504 of the Rehabilitation Act and the FHA apply to institutions regarding ESAs. As the U.S. Department of Housing and Urban Development (HUD) (2013) has issued the same guidance in regard to ESAs covered under Section 504 of the Rehabilitation Act and the FHA, each regulation will be defined separately and then the two regulations will be discussed together in regard to ESAs.

Americans with Disabilities Act. The ADA "is the nation's first comprehensive civil rights law addressing the needs of people with disabilities, prohibiting discrimination in employment, public services, public accommodations, and telecommunications" (EEOC, n.d.). In response to the ADA, postsecondary institutions initially considered physical barriers to access and made changes such as building ramps,

widening doorways, and modified furniture and equipment (Von Bergen, 2015). In Title II and Title III of the ADA, a service animal is defined "as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability" (Brennan & Nguyen, 2014, section II). The only other animal that can be considered a service animal is a miniature horse "as long as it has been individually trained to do work or perform tasks for the benefit of the individual with a disability" (ADA National Network, n.d.a, Miniature Horses section).

The two key takeaways from the ADA regarding defining service animals are: 1) the animal can only be a dog or a miniature horse, and 2) the animal must have specific training to do something to benefit the person with a disability (ADA National Network, n.d.a). These are important to note as prior to 2010, "little distinction existed between the legal definition of a 'service animal' and an 'emotional support animal'" (Grieve,2014, para. 2). In addition, the ADA indicates that:

> Service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work or the individual's disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls. (DOJ, 2011, Service Animals Must Be Under Control section).

Furthermore, a service animal should be allowed in all areas "where members of the public, program participants, clients, customers, patrons, or invitees are allowed" (ADA National Network, n.d.a, When and Where a Service Animal is Allowed Access section).

In order to be in compliance with the ADA, institutions must find ways to provide reasonable accommodations for students who have a service animal unless there is undue hardship (Dayton, 2015). "'Undue hardship' is defined as an 'action requiring significant difficulty or expense' when considered in light of a number of factors" such as the nature and cost of the accommodation in relation to the resources of the institution (ADA National Network, n.d.b, para. 1). "Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals" (DOJ, 2011, Inquiries, Exclusions, Charges… section). In these situations, the DOJ (2011) has stated that both people should be accommodated by assigning them "to different locations within the room or different rooms in the facility" (Inquiries, Exclusions, Charges… section).

Section 504 of the Rehabilitation Act. While the ADA "applies to employment, public services, public accommodations, and telecommunications" (EEOC, n.d.), Section 504 of the Rehabilitation Act of 1973 (n.d.) applies to any program or activity receiving Federal financial assistance. Specifically, Section 504 states that "No otherwise qualified individual with a disability…shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (Section 504 of the Rehabilitation Act of 1973, n.d., Section 794.(a)). "Only if a private postsecondary institution received no government funds would it be excluded from the provisions of section 504" (Huss, 2012, p. 422).

Fair Housing Act. The FHA "prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color,

national origin, religion, sex, familial status…, and disability" (HUD, n.d.b, Fair Housing Act section). The original Act was passed in 1968 as part of the Civil Rights Act and was amended in 1988 to protect people with disabilities from housing discrimination (Huss, 2012). While administrators may attempt to argue that campus housing is not a dwelling as defined by the FHA, "recent activity by HUD and the DOJ…provides clear evidence that campus housing will be considered a dwelling" (Huss, 2012, p. 431).

Section 504 of the Rehabilitation Act and Fair Housing Act. The FHA and Section 504 of the Rehabilitation Act of 1973 (Section 504) apply to people with a disability who have ESAs and live on college campuses as campus housing is considered a dwelling by both Acts. While the ADA clearly describes what a service animal is, these Acts use the term assistance animal which is much broader. In a 2013 letter, HUD states that an assistance animal is not a pet and is an "animal that works, provides assistance, or performs tasks for the benefit of a person with a disability, or provides emotional support that alleviates one or more identified symptoms or effects of a person's disability" (HUD, 2013, p. 2). Therefore, both Acts apply to service animals and also to other animals that in some way help a person with a disability. A key difference though is that an assistance animal, for the purposes of Section 504 and the FHA, is not required to have special training (Kogan et al., 2016).

In regard to defining a person with a disability, Section 504 and the FHA follow the definition from Federal nondiscrimination laws which define a person with a disability as "any (1) individual with a physical or mental impairment that substantially limits one or more major life activities; (2) individual with a record of such impairment; or (3) individual who is regarded as having such an impairment" (HUD, n.d.b, Who Is a

Person with a Disability? section). There are two key points in the definition: 1) someone with an impairment, and 2) the impairment limits one or more life activities. In regard to a physical or mental impairment, disabilities may be observable such as mobility impairments or be invisible such as mental illness, drug addiction, and alcoholism (HUD, n.d.b). “The term ‘major life activities’ includes those activities that are important to daily life” such as working, learning, and caring for oneself (HUD, n.d.b, Who Is a Person with a Disability? section). Another way to define an impairment in a major life activity is that the person “requires services or accommodations not typically made for other individuals” in regard to areas such as work, school, relationships, and communication (State of Connecticut, Department of Social Services, n.d.).

If a student requests to have an ESA on campus, the guidance from HUD is that two questions can be asked to determine if a reasonable accommodation must be made: 1) Does the student have a disability that substantially limits one or more major life activities, and 2) “Does the animal work, provide assistance, perform tasks or services for the benefit of a person with a disability, or provide emotional support that alleviates one or more of the identified symptoms or effects of a person’s existing disability?” (HUD, 2013, p. 3). If the answer to both of these questions is yes, then a reasonable accommodation must be made (HUD, 2013).

A request for an assistance animal can only be denied if the specific animal: 1) “poses a direct threat to the health or safety of others that cannot be reduced or eliminated by another reasonable accommodation” or 2) “would cause substantial physical damage to the property of others that cannot be reduced or eliminated by another reasonable accommodation” (HUD, 2013, p. 3). In addition, housing providers should not base a

decision on the breed, size, or weight of the assistance animal (HUD, 2013). Housing providers cannot apply restrictions or conditions to assistance animals that may be applied to pets such as a pet deposit (HUD, 2013).

The guidance from HUD about the FHA and Section 504 is clear that reasonable accommodations must be made for students requesting ESAs in campus housing. However, there is confusion regarding where an ESA can go on campus as a service animal can go just about everywhere.

Litigation

As Section 504 and the FHA use a broader definition than the ADA in regard to how an assistance animal is defined and there is a difference between the FHA and the ADA in regard to where an assistance animal is allowed, litigation regarding ESAs has resulted. While there are a number of cases related to ESAs, the focus of this review is the 1994 case supporting ESAs in housing with a no pets policy which is considered a landmark case (Field, 2006) and on litigation specifically focused on ESAs at institutions of higher education.

HUD v. Riverbay. *HUD v. Riverbay* (1994) is considered a landmark case in support of ESAs in housing with a no pets policy (Field, 2006). The case is about Exelberth who had been served an eviction notice for having a Yorkshire terrier in an apartment building which had a no pets rule (*HUD v. Riverbay*, 1994). After the eviction notice had been served, Exelberth presented the apartment management a letter from her treating psychiatrist that she had a mental disability, which was well documented for years, and that Exelberth needed the Yorkshire terrier for emotional needs (*HUD v. Riverbay*, 1994). When management did not accept the letter, Exelberth filed a complaint

with HUD who then decided to file suit against the apartment management, Riverbay (*HUD v. Riverbay*, 1994).

The fact that Exelberth had a documented history of mental illness which limited one or more life functions was important evidence in the case. In addition, Exelberth's treating psychiatrist and a reviewing psychiatrist both agreed that the Yorkshire terrier was beneficial for Exelberth. In addition, testimony by the treating psychiatrist described specific examples of how the dog was beneficial to Exelberth. As the requirements of the FHA were met since Exelberth had a disability which impacted one or more life functions and the dog helped to alleviate symptoms of her disability, Judge Chaitovitz found that Riverbay "engaged in a discriminatory housing practice" and that Exelberth was "entitled to appropriate relief" (*HUD v. Riverbay*, 1994).

Judge Chaitovitz ordered Riverbay to make an accommodation under the FHA for Exelberth and to not implement or enforce the no pets policy (*HUD v. Riverbay*, 1994). In addition, Judge Chaitovitz awarded Exelberth $2,500 for emotional distress (HUD v. Riverbay, 1994). Riverbay was also ordered to pay a civil penalty of $5,000 to HUD (*HUD v. Riverbay*, 1994). Additional orders by Judge Chaitovitz required Riverbay to notify all tenants of their rights in regard to disabilities and the FHA, training of employees about tenant rights under the FHA, and submission of regular reports to HUD about complying with the orders (*HUD v. Riverbay*, 1994).

Our Lady of the Lake University. Even though the complaint filed with the U.S. Justice Department's Civil Rights Division against Our Lady of the Lake University did not result in litigation (Field, 2006), the situation is important to consider due to the importance of understanding the difference between a service animal under the ADA and

an ESA under the FHA. In 2005, a student at Our Lady of the Lake University desired to bring her pet ferret on campus for panic attacks and filed a complaint with the DOJ when her request was denied by the university (Field, 2006). While there is not clarity as to why the request was denied by the DOJ, one reason may be that the claim, as described by Field (2006), was based on the ferret being described as a service animal. As the ADA is clear that a service animal must be trained and can only be a dog or miniature horse, the claim was denied by the DOJ. What is unknown is whether the claim would have been further investigated if the ferret was an ESA.

Unfortunately, the student "struggled academically and socially, and suffered frequent panic attacks" and left for academic reasons (Field, 2016). Regrettably, there is only speculation about whether the student might have succeeded that first semester in college if the student had been allowed to have her ferret in housing with her. While the DOJ did not take action on this grievance, the college "lost financially due to the incurred legal expenses" (Von Bergen, 2015, p. 18).

Alejandro v. Palm Beach State College. Even though *Alejandro v. Palm Beach State College* is about reasonable accommodation for a service animal, there are relevant points in the opinion when considering reasonable accommodations for an ESA. As such, the case is included in this review.

While attending college, Alejandro was diagnosed with "post-traumatic stress disorders, major depressive disorder, attention deficit hyperactivity disorder, and a learning disorder" (*Alejandro v. Palm Beach State College*, 2011, p. 2). Alejandro trained her dog, Ambrosius, to "establish eye contact, nip her fingers, or snort when he perceives imminent panic attack" (*Alejandro v. Palm Beach State College*, 2011, p. 2). Even though

Alejandro provided Palm Beach State College with evidence of her disability and a description of what Ambrosius was trained to do as a service animal, the college denied Alejandro from having Ambrosius on campus with her, escorted her off campus multiple times, and filed disciplinary proceedings against her (*Alejandro v. Palm Beach State College*, 2011).

Alejandro filed suit against Palm Beach State College asking for an injunction to allow Ambrosius on campus as a service animal, to remove a failing grade from her record, to reimburse tuition for the failed course, and to have defendants pay her attorney's fees (*Alejandro v. Palm Beach State College*, 2011). While the court denied ordering the grade removal, tuition reimbursement, and payment for attorney's fees, the court did grant the injunction to allow Alejandro to have her dog on campus as Alejandro has a disability and the dog is trained as a service animal (*Alejandro v. Palm Beach State College*, 2011).

One of the arguments of Palm Beach State College was that Ambrosius was a disruption to the learning environment because students wanted to pet him during class and therefore allowing Alejandro to have Ambrosius as a service animal was an unreasonable accommodation (*Alejandro v. Palm Beach State College*, 2011). The court found that any potential harm or disruption caused by the presence of the service dog was minimal in comparison to the benefit experienced by the student, and, therefore, its presence was considered a reasonable accommodation" (Grieve, 2014).

While *Alejandro v. Palm Beach State College* (2011) was filed due to a violation of the ADA, there are two important points in regard to ESAs. The first is the need for a

medical professional to describe how an animal alleviates a person's disability. In Judge Middlebrook's opinion, the following was included about the psychologist's testimony.

> Plaintiff's psychologist states that without her service dog, Plaintiff appears to experience severe and debilitating anxiety as a result of her disability." (DE 20-4 at 1). The psychologist also states that Plaintiff's service dog makes a clinical difference for Ms. Alejandro, and has proved to be a crucial accommodation, enabling her, for the most part, to study and learn without experiencing debilitating anxiety." (1d. at 2). Furthermore, it is apparent that Plaintiff s dog allows Plaintiff to recognize her symptoms of anxiety by establishing eye contact with Ms. Alejandro, emitting a snort, and/or nipping her fingers gently, which allows her to take precautionary measures to avert further distress." (DE 20-4 at 1). (*Alejandro v. Palm Beach State College*, 2011, p. 10)

While Ambrosius qualified as a service animal, the above quote from the court's decision reinforces the need to demonstrate that the person has a disability and how the animal helps to enable the person to participate fully. These points are important for students with ESAs to demonstrate as well.

The other point that Judge Middlebrook made clear was what questions can be asked of a person with a disability. Judge Middlebrook cited the Federal Nondiscrimination on the Basis of Disability in State and Local Government Services regulation, 28 C.F.R. j 35.136(9 (201 1), that:

> A public entity may ask if the animal is required because of a disability and what work or task the animal has been trained to perform. A public entity shall not require documentation, such as proof that the animal has been certified, trained, or

> licensed as a service animal. (as cited in Alejandro v. Palm Beach State College, 2011, p. 9)

Again, while this is specifically related to a service animal as covered by the ADA, the same applies to ESAs as will be reviewed in *U.S.A. v. University of Nebraska at Kearny* (2013).

Velzen v. Grand Valley State University. *Velzen v. Grand Valley State University* found that an ESA should be allowed in campus housing. Velzen had been diagnosed with depression four years prior to attending college and relied upon her guinea pig, Blanca, to help her manage her depression (*Velzen v. Grand Valley State University*, 2012). In addition, two years prior to attending college, Velzen had a pacemaker inserted (*Velzen v. Grand Valley State University*, 2012). Velzen provided a letter to Grand Valley State University from her therapist describing her depression, heart condition and the need for Blanca. Judge Bell included portions of the letter in the opinion for the case.

> The use of a comfort object, such as Blanca, is a necessary means of controlling stress and managing symptoms." (Id. at ¶ 37.) Graham added that "[t]he presence of Blanca provides Ms. Velzen with continued emotional support and attachment (thereby reducing symptoms of depression), physiological benefits (such as decreased heart rate), and psychological benefits (such as increased Oxytocin levels, which directly impact the sense of life satisfaction)." (Id.) (*Velzen v. Grand Valley State University*, 2012)

While the therapist describes that Velzen's guinea pig is beneficial to her, there is not quite as much clarity in regard to her depression and whether one or more life activities

are impacted. Grand Valley State University initially denied Velzen's request and then, according to Velzen, allowed Blanca for a temporary period of time (*Velzen v. Grand Valley State University*, 2012).

As Velzen was concerned about the university rescinding the decision to allow Blanca in housing, she sought an injunctive relief under the FHA and an injunctive relief and compensatory damages under Section 504 (*Velzen v. Grand Valley State University*, 2012). Grand Valley State University claimed that since Velzen did not have a physical disability and since Blanca did not fit the definition of a service animal under the ADA, no reasonable accommodation was required for the guinea pig and requested that all claims be dismissed by the court (*Velzen v. Grand Valley State University*, 2012). Judge Bell's decision to allow the claims for injunctive relief under the FHA and an injunctive relief and compensatory damages under Section 504 pursuant to the failure to accommodate theory to remain was clear that while the ADA may not apply, the FHA and Section 504 do.

U.S.A. v. University of Nebraska at Kearny. *U.S.A. v. University of Nebraska at Kearny* (2013) was filed because the University of Nebraska at Kearny denied Brittany Hamilton's request to have her dog in campus housing as a therapy dog which is the term used by the court. Hamilton had been diagnosed with depression and anxiety and prescribed a therapy dog which had been trained to respond to her anxiety attacks (*U.S.A. v. University of Nebraska at Kearny*, 2013). The University of Nebraska at Kearny denied Hamilton's request to have her dog in campus housing on the basis that residence halls and campus apartments are not dwellings under the FHA (*U.S.A. v. University of Nebraska at Kearny*, 2013). What's interesting about this particular case is the claim was

not made that Hamilton's dog was a service animal. While not specifically stated in the opinion, one would assume the dog fits the definition of an ESA and not a service animal. One reason this conclusion may be made is that the claim was that the University of Nebraska at Kearny discriminated against Hamilton in regard to housing which is covered under the FHA. In addition, there was no mention of the ADA in the opinion.

Two important points came from *U.S.A. v. University of Nebraska at Kearny* (2013). First, "The U.S. District Court for Nebraska held that the residence halls at the University of Nebraska at Kearny are subject to the Federal Housing Act and its regulations" and must allow ESA to live with students ("FHA permits", 2013, p. 9). While current guidance about the FHA clarifies that campus housing is considered a dwelling for purposes of the FHA, that was not always the case. This particular opinion provided clarity that campus housing is subject to the FHA.

The second point that came from *U.S.A. v. University of Nebraska at Kearny* (2013) was in regard to what can be asked of a student to document their disability and the need for an ESA. The "DOJ determined that the university discriminated against the student by requiring 'detailed disability information that goes beyond what is needed to review a request for reasonable accommodation in housing'" (Von Bergen, 2015, p. 19).

Strategy and Policy Development Summary

The regulations and resulting guidance from the DOJ and HUD as well as litigation have supported the idea that a person with a disability that limits one or more major life activities has a right to have an ESA in campus housing regardless of the pet policy. Clarity was also provided in *Alejandro v. Palm Beach State College* (2011) and *U.S.A. v. University of Nebraska at Kearny* (2013) that burdensome or overly intrusive

information should not be asked of students requesting a reasonable accommodation for a service animal or an ESA. If the disability is not observable, the institution may:

> Request disability related information that first verifies the condition as any that substantially limits one or more of the person's life activities; second, describes the need for the requested accommodation; and finally, demonstrates the relationship between the resident's disability and the need for a reasonable accommodation. (Von Bergen, 2015, p. 26).

Policy Enactment

Policy enactment, or policy content, "focuses on identifying the specific policy elements that are likely to be effective" (Brownson et al., 2009, p. 1579). For the purposes of this paper, policy enactment focuses on what should be included in ESA policies based on the regulations, litigation, and resulting guidance. First, general policy considerations will be examined, followed by documentation recommendations, and then student responsibilities.

General Policy Considerations

The FHA does not require that housing providers have formal policies in place for accommodation requests (DOJ & HUD, 2004). However, institutions should have a policy so that there is a process to review accommodation requests for ESAs. The need for a policy was demonstrated when the DOJ filed a lawsuit against Kent State University in 2014 when a request for an ESA was denied based upon the service animal policy as no ESA policy existed (Sutton, 2016). One aspect of the settlement was that Kent State's policy was revised to include ESAs as well as service animals and this was posted in housing and on housing websites (Sutton, 2016). The policy may mirror the service

animal policy, however there are distinct differences for ESA requests to consider (Huss, 2012). One should also remember that "federal laws provide a floor, not a ceiling" (National Association of College and University Attorneys [NACUA], 2011, p. 6).

In creation of a policy, institutions may approach the process differently. However, there are most likely some commonalities such as who is involved in the committee creating the policy. "The following should be considered for inclusion on the committee: university general counsel, accessibility services (for students and employees), the office that addresses discrimination complaints, the counseling center, campus police, and departments that utilize animals for academic…[and] research purposes" (Kogan et al., 2016, p. 278). The counseling center should be involved as staff may be involved with supporting students in the decision process about requesting to have an ESA on campus or may be asked to write letters indicating the need for an ESA (Adams et al., 2017). This committee could also then be used as a consultative body when requests are made outside the realm of existing policies (Kogan et al., 2016).

The differences between a service animal, ESA, and pet therapy can create confusion. As such, having the policy establish a common language and define these terms as well as the term disability would be wise (Kogan et al., 2016). Institutions may also desire to describe, and possibly compare and contrast, where service animals and ESAs are allowed to go particularly if there are differences in the institution's policy (NACUA, 2011). Including frequently asked questions and the pros and cons of having an animal on campus may also be helpful for students to understand the responsibilities of having an animal on campus (Kogan et al., 2016).

Including staff training in the policy is recommended for a number of reasons. One reason is that the "law surrounding accommodation of animals is complex" (NACUA, 2011, p. 7). There is also often skepticism about an animal when the disability is not obvious (NACUA, 2011). Training for staff is also recommended as campus visitors may bring animals onto campus (Hope, 2017). As such, staff need to know what they are able to ask (Hope, 2017).

Training for staff has also been included in litigation settlements. In *Hud v. Riverbay* (1994), the judge ordered that employees of the apartment building receive training about tenant rights under the FHA. Portland State University's settlement with a deaf student also included training for employees about the ADA and FHA (Green, 2019). While the lawsuit against Portland State University was related to a service animal being allowed in a carpeted dorm (Green, 2019), the settlement still demonstrates the need for staff to understand what is a reasonable accommodation. Salminen and Gregory (2018) also suggest training students requesting an ESA about the campus' ESA policy and their responsibilities if the request is approved.

ESA requests and resulting accommodations for an ESA should be made on a case by case basis which is similar to how service animal requests are determined (Masinter, 2015; NACUA, 2011). A key difference though between the ADA and FHA is that the FHA does not restrict the type of assistance animal (Huss, 2012). However, animals could be limited to domesticated animals and not include more exotic species (Huss, 2012). One reason for this is that exotic animals often pose a direct threat to others which is a valid reason for denying the request (Masinter, 2015; NACAU, 2011).

"Simply stated, monkeys and wild animals have no place in campus residence halls; they pose a danger to every resident and to physical property" (Masinter, 2017, p. 3).

In addition, the policy can include requirements that the animal be housebroken and able to reasonably live with others (NACUA, 2011; Masinter, 2015). Additional animal requirements could be based on the size of the animal and whether vaccinations are up to date (Masinter, 2015). While limitations can be placed on the type of animal that is allowed, students who request to have an ESA on campus cannot be limited to a particular residence hall (Hope, 2016).

Documentation

The courts clarified in *Alejandro v. Palm Beach State College* (2011) and *U.S.A. v. University of Nebraska at Kearny* (2013) that burdensome or overly intrusive information should not be asked of students requesting a reasonable accommodation for a service animal or an ESA. In *U.S.A. v. University of Nebraska at Kearny*, the "DOJ determined that the university discriminated against the student by requiring 'detailed disability information that goes beyond what is needed to review a request for reasonable accommodation in housing'" (Von Bergen, 2015, p. 19). An example of intrusive information is asking for the student's disability when all that is needed is to know the student has a disability (Chandler, 2019). Therefore, ESA policies should not require burdensome documentation, but should assist "in approving legitimate ESA requests while disapproving those that fail to establish a disability or fail to show how the ESA will ameliorate the substantial limitations from a disability in a way that provides equal use and enjoyment of campus housing" (Masinter, 2016, p. 4).

However, the FHA "does require emotional support animal documentation to be provided by a licensed health care or mental health care provider, as well as for the recipient of the documentation to be under the care of the provider" (Chandler, 2019, p. 53). The documentation should focus on whether the student meets the FHA's definition of a person with a disability, describe the needed accommodation, and demonstrate the relationship between the disability and the accommodation (DOJ & HUD, 2004). For an ESA request, the documentation should indicate that the "student has a disability for which the animal is needed; how the animal assists the student…[and] the nexus between the student's disability and the assistance that the animal provides" (NACAU, 2011, p. 7). In addition, the letter should indicate the student is under the provider's care (Chandler, 2019). This should provide sufficient information to determine if the animal meets the definition of an ESA (NACUA, 2011).

In order to obtain this information, institutions can request students submit a school verification form to the student's provider attesting to the student's need for an ESA (Masinter, 2016). In addition, the form can reasonably ask for the professional license number of the person attesting the student's need for an ESA (Masinter, 2016). "Some schools also include a question asking how long the provider has been working with the student, and whether the provider prescribed the particular ESA" (Masinter, 2016, p. 4). Professionals may place a time limit on the validity of the documentation and require follow up visits by the student (Chandler, 2019).

The policy can indicate that students must notify the disability office at least 30 days prior to the desired date for the animal to reside with the student (NACUA, 2011). A delay in decision by the institution "may be deemed to be a failure to provide reasonable

accommodation" (DOJ & HUD, 2011, p. 11). The consent decree in *U.S.A. v. University of Nebraska at Kearny* (2015) states that within seven days of receiving the documentation the university will determine if an accommodation is needed or inform the student the documentation is insufficient to request additional information.

Student Responsibilities

Campus policy should "place the responsibility for supervising, controlling and caring for animals on the users" (Shackelford, 2013). This can be enforced via a contract with the student which describes the expectations (Adams et al., 2017). Some of the responsibilities include the student adhering to "state and local requirements regarding vaccination, licensure, leash control, cleanup rules, animal health, etc." (NACAU, 2011, p. 8). In addition, the contract can state that the animal may not be left overnight, "whether alone or in the care of a roommate" (Masinter, 2015, p. 7). The contract may also indicate that the school can inspect for fleas and ticks and bill the student for fumigation (Masinter, 2015).

An animal can be removed, following due process as applicable, in a number of situations. A breach of contract by the student should initiate the consequences described in the policy (Adams et al., 2017). In addition, an animal that is mistreated or abused can be immediately removed (Masinter, 2015). Another possible reason for removal is if the animal is extremely disruptive or the student is unable to mitigate disturbances (Salminen & Gregory, 2018). While the animal can be removed from campus, the student has a right to stay (O'Brien, 2019) which could be explained in the contract. While institutions cannot charge any fees for an ESA in campus housing (DOJ & HUD, 2004), fees may be assessed for damages caused by the animals (Masinter, 2015).

One aspect of having an animal on campus is ensuring the animal's safety. As such, the policy can ask students how the ESA will be cared for, or who should be contacted in case of emergency or if the student is incapacitated (Kogan et al., 2016). In addition, the contract can free the school "from responsibility for removing or caring for the animal during an emergency" (Masinter, 2015, p. 7) such as a fire. To mitigate this, the policy can suggest students voluntarily place some sort of indication on their door for first responders in case of emergency (Kogan et al., 2016).

While documentation must be kept confidential (DOJ & HUD, 2004), "Students must consent to some limited sharing with other students/others about the animal's presence" (Hope, 2016, p. 4). In addition, if the ESA is no longer needed or no longer on campus, the student should be required to notify the institution (*U.S.A. v. University of Nebraska at Kearny*, 2015). If an ESA is replaced with a different animal, the student can be required to follow the request procedures again for the new animal (*U.S.A. v. University of Nebraska at Kearny*, 2015).

Policy Enactment Summary

There are many aspects to developing an ESA policy. Considerations include forming a committee to develop the policy and to act as a consultant body once the policy is implemented (Kogan et al., 2016), training for staff (NACUA, 2011) and students requesting accommodations (Salminen & Gregory, 2018), and indicating that only domesticated animals are allowed (Huss, 2012). In regard to documentation, undue burden should not be placed on the student (Von Bergen, 2015), but asking for documentation from a licensed provider that is currently caring for the student is acceptable (Chandler, 2019). The documentation should indicate the student has a

disability, that the animal is needed, and demonstrate the relationship between the disability and the accommodation (DOJ & HUD, 2004). Finally, there are student responsibilities such as complying with local vaccination requirements, licensure, leash control, cleanup rules, and the animal's health (NACAU, 2011).

Policy Implementation

The section focuses on what happens after the ESA policy is enacted. Examining policy implementation is important to understand the impact of the enacted policy (Brownson et al., 2009). The reviewed impacts include the number of ESA requests, false claims and documentation, misconceptions about ESAs, conflicts between requests, and student experiences. As appropriate, suggestions for policy enactments are made to mitigate potential issues.

Emotional Support Animal Requests

The National Service Animal Registry (n.d.) provides education related to service and emotional support animals and maintains a service dog registry. The number of ESA registrations by the National Service Animal Registry increased from 2,400 in 2011 to almost 200,000 in 2019 (Stockman, 2019). Yamamoto et al. (2015) found that the percentage of dogs registered in California as providing emotional support went from 0 in the registration period of 2000-2002 to 53, which is 19% of the registered assistance animals, in the 2010-2012 registration period.

The number of college students who have an ESA is not easy to determine. Based on a national survey, Clark (2017) reported a 358% increase in the number of college students reporting that they use an ESA. However, this number could not be confirmed. What is known is that a number of institutions have been quoted as to the number of

ESAs on their campuses. For example, Miami University's Oxford campus was quoted as stating they have 36 ESAs on campus (Clark, 2017), Washington State University went from two to three requests in 2011 to 60 to 75 requests in 2019 (Bauer-Wolf, 2019), Northern Arizona University went from a few requests a year to 85, Oklahoma State has 66 ESAs on campus (Gose, 2016), the University of Pittsburgh was quoted as having 10 ESAs, and Washington and Jefferson College as having six (Levine, 2018). These increases could be due to people with disabilities recognizing how dogs can support them or due to misconceptions about the differences between service animals, ESAs, and pets (Rust & Wise, 2017).

False Claims and Documentation

An Internet search for "emotional support animal" returns multiple results of websites that for a fee will write a letter describing how a pet is an ESA. Gose (2016) estimated that the cost of a letter from a website averages $150. Some people believe these websites are a scam that are irresponsible and opportunistic particularly since the FHA does not require registration of ESAs (Chandler, 2019). These websites are thriving due to confusion around the requirements for an animal to be an ESA under the FHA (Salminen & Gregory, 2018). The challenge with these websites is that misrepresenting pets as an ESA trivializes people with disabilities who rely upon an ESA (Rust & Wise, 2017). In response to these websites, Jane Jarrow, an educational disabilities consultant, created a watch list of practitioners who provide letters to students for a fee after completing a form or a quick 'therapeutic' session (Taylor, 2016).

In addition, "people have learned that they can get away with taking their emotional support animals just about anywhere, even though they have no legal right to

do so" (Chandler, 2019, p. 53). As such, students may claim they have trained an ESA as a psychiatric service animal so they can take the animal to classes (Masinter, 2019). Additionally, students have rehearsed fraudulent answers to the two allowed questions so one ends up accepting the animal as a service animal (Masinter, 2019). Some states have made falsely claiming an animal as an ESA or service animal a criminal offense (Masinter, 2019). However, these offenses are not usually prosecuted due to other priorities (Masinter, 2019).

Jamie Axelrod, a director of disability services, stated, "In a sense, we are dependent on the ethical commitment of the providers who are giving out these letters" (Gose, 2016). At the same time, physical and mental health care providers are struggling with writing these letters due to professional ethics and the associated legal liability (Salminen & Gregory, 2019). However, an online survey to determine perceptions about service animals, ESAs, and therapy dogs found that most people "reported feeling the majority of people are not taking advantage of the system" (Schoenfeld-Tacher et al., 2017, p. 1). While the majority of students claiming a pet is an ESA will be dissuaded by the documentation requirements, policies should anticipate the occasional dishonest student (Masinter, 2019). However, if a false claim is made, there is a need to distinguish between a false claim and an unknowledgeable student as the ADA and FHA protect against retaliation (Masinter, 2019).

Misconceptions

Schoenfeld-Tacher et al. (2017) conducted an online survey to determine perceptions about service animals, ESAs, and therapy dogs. They found that there are "misconceptions about definitions, rules, regulations, and rights associated with each type

of animal" (Schoenfeld-Tacher et al., 2017, p.1). As such, the increase in the number of ESAs could be due to people wanting their pets with them and not understanding the various definitions and legal requirements (Rust & Wise, 2017). This is why an ESA policy should clearly describe each type of animal.

Students are also sometimes confused about where they are allowed to take their ESA. Consider this example about Kelly, a freshman living in a dorm (Tedeschi et al., 2015). Kelly received an accommodation to have an 8-moth-old lab puppy in her residence as an ESA (Tedeschi et al., 2015). "During the first week of classes, Kelly took her dog to class with her" (Tedeschi et al., 2015, p. 327). When a professor asked about the dog, Kelly responded that "he is a 'service dog' and the university has approved his presence on campus" (Tedeschi et al., 2015, p. 327). While the dog was approved to be on campus, Kelly should not have taken the dog to class as the dog was approved under the FHA (Tedeschi et al., 2015). This type of situation can be avoided by clearly defining in the policy where an ESA is allowed.

As an ESA is limited to the dwelling unit under the FHA (Hope, 2016), an ESA policy can deny access to other parts of the campus such as dining halls, academic buildings, and the campus itself (Salminen & Gregory, 2018). If a student desires to take an ESA to other parts of the campus, the "disability services office should make that determination independently, applying the ADA and Section 504 standards" (Masinter, 2015, p. 3). This was made clear in an Office of Civil Rights (OCR) investigation of a complaint filed against Delaware Technical Community College ("Review Rulings," 2019). A student filed a complaint as the college refused to let the student's ESA other places than campus housing pursuant to the FHA ("Review Rulings," 2019). The

resulting letter from OCR clarified that even though “comfort animals aren’t considered service animals under the ADA, they may be considered as a necessary accommodation under Section 504” (“Review Rulings,” 2019, p. 16).

Conflicting Situations

There most likely will be students on campus who object to animals in campus housing and “other buildings based on allergies, phobias, or other psychological or physiological problems with animals” (Von Bergen, 2015, p. 28). “Many studies over the previous two to three decades have suggested that allergic diseases have increased in frequency. Most notable has been the increase in asthma” (Ownby & Johnson, 2016). As “allergies are the 6th leading cause of chronic illness in the U.S. [and that] more than 50 million Americans suffer from allergies each year” (CDC, 2017b), one can assume that there are students on campus who are allergic to animals.

In regard to phobias, about 11% of the United States population is afraid of dogs (Brewer, 2001). Therefore, one should assume that about 11% of the campus population will also have a fear of dogs. In regard to religious concerns about dogs, Muckle and Lasikiewicz (2017) stated that signs indicating dogs would be on campus for an AAA was required in Singapore due to “religious reasons as some students may wish to avoid the sites where dogs would be present” (p. 77). Whether the concern is related to a phobia, religious reason, or allergy, there is a need to consider that there may be students on campus who wish to avoid dogs.

The DOJ (2011) is clear on the issue that:

> Allergies and fear of dogs are not valid reasons for denying access or refusing services to people using service animals. When a person who is allergic to dog

> dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility. (Inquiries, Exclusions, Charges… section).

While the focus is on a service animal, one can reasonably assume the same logic would hold true for ESAs.

The DOJ (2011) guidance though does not address what to do when both students have a disability and the animal exacerbates the other student's disability. This occurred at Ohio State University. When an ESA request was approved for one student, another objected due to a documented disability of Crohn's disease which the student self-reported was made worse by anxiety due to an allergic reaction to dogs (Masinter, 2018). As the student with Crohn's disease secured housing first, the university asked the student with the ESA to change housing (Masinter, 2018). The student refused and then sued the university under Section 504, the ADA, and the FHA. The court did not disagree with the logic to give priority to the first student to secure housing (Masinter, 2018). What the court disagreed with was accepting the self-report of the allergy from the student as there was no supporting documentation other than the self-report of the allergy (Masinter, 2018). Therefore, "when requests for accommodations conflict, self-reports of nonvisible disabilities are not sufficient to resolve potential conflicts" (Masinter, 2018, p. 3).

In addition, the consent decree of *U.S.A. v. University of Nebraska at Kearny* (2015) indicates that the student requesting the ESA

> must provide written consent for Disability Services to disclose information regarding the request for and presence of the Assistance Animal to those individuals who may be impacted by the presence of the animal…and shall not include information related to the individual's disability. (p. 5)

As such, institutions can learn about potential conflicts before the ESA is actually residing in campus housing.

Student Experience

Examining the student experience has two perspectives. One perspective is that of the student with the ESA. The other perspective is that of other students who have contact, either directly or indirectly, with the ESA.

Student with ESA Perspective. One goal of ESA policies is to comply with regulations. However, the primary goal is student success. The hope is that students with a disability who find support from an ESA will be able to participate and be successful in college due in part to the therapeutic effect of the ESA. For a Miami University freshman, Angela Ackerman, that appears to be the case as her ESA, a dog named Raven, helps her to get focused, relax, and be in a better mood (Clark, 2017).

The challenge is the literature about the human-animal bond related to ESAs is limited (Yamamoto and Hart, 2019). This was confirmed when searching for research investigating the benefits of ESAs. While a number of results investigated the impact of service or companion animals, no research articles were found that reported on ESA impacts for college students. As such, there is a need for research about the benefits college students experience from ESAs.

There are possible detriments to students having ESAs on campus. Having an animal, particularly a dog, is demanding as the animal needs fed, taken out to go to the bathroom, may get sick, etc. (Yamamoto & Hart, 2019). Another potential detriment is unwanted attention (Yamamoto & Hart, 2019) as other students will see the student with the ESA. Finally, animal death is a possible detriment as "the stronger the attachment, the more likely it is that people will experience difficulty in overcoming the separation" (Yamamoto & Hart, 2019, p. 92). In addition, the animal's death may be "the first significant loss they have experienced in their life to that point" (Adams et al., 2017, p. 312).

Other Student Perspective. Other students on campus may come into contact with ESAs either directly or indirectly. Direct contact occurs from being the roommate of the student with an ESA or engaging with the ESA when the animal is outside for exercise. Indirect contact occurs when an ESA makes noise, there is an odor due to the ESA, the ESA damages something, or ESA feces is not removed by the student. Meredith College in North Carolina states that handling complaints and roommate issues as a result of ESAs takes a significant amount of time (Meredith College, personal communication, January 17, 2020).

Policy Implementation Summary

The focus of this section was about what happens after the ESA policy is implemented. There is evidence that institutions are facing a growing number of requests for ESAs. One challenge with the increasing number of requests is misconceptions about when an animal is considered an ESA and where the animal can go on campus. In addition, some requests may use letters supporting the student's need for an ESA from

unreputable sources. Even when the policy mitigates misconceptions and false claims, there can still be conflicts due to allergies, phobias, and competing priorities between students with disabilities. While the main goal of allowing ESAs on campus for students with disabilities is so that they can be successful, there is a need for research about the benefits college students experience from ESAs. There are also possible detriments to students having ESAs on campus as animals place demands on students and may cause unwanted attention (Yamamoto & Hart, 2019, p. 92).

Literature Review Summary

The stages of policy development as suggested by the CDC (n.d.a) were adapted to examine the literature regarding ESAs. In regard to policy identification, there are concerning trends that provide evidence that the physical and mental health of Millennials and Generation Z are decreasing. In addition, the increasing number of students with anxiety and stress is concerning as stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014).

The policy analysis stage examined both sides of two controversies about ESAs, that other treatment options can be pursued (Phillips, 2016) and that the research is not conclusive that animals are helpful to humans (Brulliard, 2017). In regard to the treatment options, Phillips (2016) argues that the controversy is due to a "misguided conception that comes from misinformation and a lack of education on mental health and disabilities" (p. 97). While the studies about the benefits of pet ownership and AAAs each have different strengths, limitations, methods, and procedures, there is a preponderance of evidence that people experience benefits from the human-animal bond.

The strategy and policy development stage focused on regulations and resulting guidance from the DOJ and HUD as well as litigation that have supported the notion that a person with a disability that limits one or more major life activities has a right to have an ESA in campus housing regardless of the pet policy. Clarity was also provided in *Alejandro v. Palm Beach State College* (2011) and *U.S.A. v. University of Nebraska at Kearny* (2013) that burdensome or overly intrusive information should not be asked of students requesting a reasonable accommodation for a service animal or an ESA.

The policy enactment section examined the various aspects of an ESA policy. Considerations included forming a committee to develop the policy and to act as a consultant body once the policy is implemented (Kogan et al., 2016), training for staff (NACUA, 2011) and students requesting accommodations (Salminen & Gregory, 2018), and indicating that only domesticated animals are allowed (Huss, 2012). In regard to documentation, undue burden should not be placed on the student (Von Bergen, 2015), but asking for documentation from a licensed provider that is currently caring for the student is acceptable (Chandler, 2019). The documentation should indicate the student has a disability, that the animal is needed, and demonstrate the relationship between the disability and the accommodation (DOJ & HUD, 2004). Finally, student responsibilities were reviewed such as complying with vaccination needs, licensure, leash control, cleanup rules, and the animal's health (NACAU, 2011).

The final stage, policy implementation, explored some of the impacts of ESA policies. For example, there is evidence that institutions are facing a growing number of requests for ESAs which has created a number of challenges. One challenge is misconceptions about what an ESA is and where the animal can go on campus. In

addition, some requests may use letters supporting the student's need for an ESA from unreputable sources. Even when the policy mitigates misconceptions and false claims, there can still be conflicts due to allergies, phobias, and competing priorities among students with disabilities. While the main goal of allowing ESAs on campus for students with disabilities is so that they can be successful, there are also possible detriments to students having ESAs on campus as animals place demands on students and may cause unwanted attention (Yamamoto & Hart, 2019, p. 92).

Chapter III: Methodology

Students with mental health disabilities may have emotional support animals (ESAs) which assist them to participate in college. Benefits associated with ESAs have included: to reduce anxiety (Yamamoto & Hart, 2019) and to "provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias" (Brennan & Nguyen, 2014, section III). As ESAs mitigate the impact of a disability, college campuses receive requests for ESAs and the number of requests to have ESAs living on campus has increased (Bauer-Wolf, 2019).

In response to the ESA trends, regulations, resulting guidance, and litigation, many higher education institutions have created and implemented ESA policies and procedures. Journals focusing on disability and legal issues frequently describe what should be in the policy. However, a void seems to exist regarding what ESA policies and procedures have been enacted and the resulting staff experiences.

This chapter discusses the theoretical framework, research questions and design, research ethics and human subjects protection, sample, instrumentation, data collection and analysis, and limitations of the study.

Theoretical Framework

The current research uses the CDC's evaluation framework for policy evaluation, see Figure 3.1. Policy evaluation applies "methods to examine the content, implementation or impact of a policy" (CDC, n.d.a, p. 1). Commonly used today, the framework provides structure to the CDC evaluation process (Kidder & Chapel, 2018). The CDC (2017a) describes the framework as "a practical, nonprescriptive tool, designed to summarize and organize essential elements of program evaluation" (para. 1). After an

extensive review of the literature, the CDC framework best matched the intent of the study and provided the best framework for examining enacted ESA policies and resulting staff experiences in comparison to other possible frameworks.

Figure 3.1

Policy Development and Evaluation Stages

Note. Adapted from CDC (n.d.a).

The three types of policy evaluation included in the CDC framework are content, implementation, and impact (CDC, n.d.a). Content evaluation focuses on evaluating the policy stages of problem identification, policy analysis, and strategy and policy development. Implementation evaluation focuses on the policy stage of policy enactment. Furthermore, impact evaluation is primarily focused on the policy stage of policy implementation.

Content evaluation examines the "substantive information and material contained within a policy" (CDC, n.d.b, p.1). As this was not a focus for this study, content evaluation was not examined. However, implementation and impact evaluation both relate to the purpose of this study. As such, the framework supported development of the research questions.

Research Questions

This study examined what ESA policies campuses implemented and the resulting staff experiences. Possible enacted policy components were determined from the regulations, resulting guidance, litigation, and journal article recommendations. Potential staff experiences were developed from the review of litigation, governmental guidance, and journal articles. As this study examined what ESA policies campuses implemented, the resulting staff experiences, and the relationship between them, the research questions focused on these concepts.

R1: What is the relationship between enacted ESA policy and resulting staff experiences?

H_1: Enacted ESA policy impacts staff experiences.

H_0: Enacted ESA policy does not impact staff experiences.

R2: Which enacted policy components contributed to staff experiences?

H_1: There are specific enacted ESA policy components which impact staff experiences.

H_0: There are not specific enacted ESA policy components which impact staff experiences.

R3: What differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences?

H_1: Differences exist by institutional characteristics regarding enacted policy components.

H_0: No differences exist by institutional characteristics regarding enacted policy components.

H_2: Differences exist by respondent characteristics regarding enacted policy components.

H_0: No differences exist by respondent characteristics regarding enacted policy components.

H_3: Differences exist by institutional characteristics regarding staff experiences.

H_0: No differences exist by institutional characteristics regarding staff experiences.

H_4: Differences exist by respondent characteristics regarding staff experiences.

H_0: No differences exist by respondent characteristics regarding staff experiences.

Institutional characteristics included the size of the institution based on the Carnegie size classification, the institution category from the Pennsylvania Department of Education, the highest degree granted, the percent of students with a reported disability, the percent of students that are not Caucasian, and the county class (population grouping) of where the institution is located. Respondent characteristics included the person's role, self-rated knowledge of the campus's ESA policy, how frequently the respondent references the policy, and length of time in current position.

Research questions one and two both stem from impact evaluation of the policy. The first research question answers whether staff experiences can be attributed to the policy which is one purpose of impact of evaluation (CDC, n.d.d). The second research question examines outcomes of the policy in staff experiences which is another purpose

of impact evaluation, “measuring changes in short-term, intermediate and long-term outcomes” (CDC, n.d.d, p. 1).

The third research question relates to implementation evaluation. One purpose of implementation evaluation is to document and compare “different intensities or variations of policy” (CDC, n.d.c, p. 1). This type of comparison assists in interpreting the results accurately (CDC, n.d.c).

Research Design

This study utilized a survey research design which “provides a quantitative or numeric description of trends, attitudes, or opinions” (Creswell, 2014, p. 13). A survey method allows one “to generalize from a sample to a population so that inferences can be” made (Creswell, 2014, p. 157). As the sample was from a large geographic area, an Internet survey was used to collect the data.

Ethical Considerations

Immaculata University’s Research Ethics Review Board (RERB) approved the study prior to the survey being deployed (Appendix A). Approval by the RERB ensured that the study and survey met Immaculata University’s guidelines, policies, and procedures and was “in compliance with the guidelines, policies, and regulations of the Office for Human Research Protections (OHRP)” (Immaculata University, n.d., Purpose section). Respondents experienced minimal risks from participating in this study. Completing the survey could have caused discomfort in regard to looking at a monitor and using a mouse and keyboard. Completing the online survey could have caused respondent fatigue. Hence, respondents were encouraged to stop, rest, and restart the online survey at a later time as needed.

Survey respondents were limited to the primary disability services and residence life staff at postsecondary institutions in Pennsylvania with campus housing. Common titles for these roles include Residence Life Director and Disability Services Director. Exclusion criteria included the respondent being under 18 years of age or not employed on a campus with housing. Respondents consented to participating in the study by answering affirmatively to being over 18 years of age and voluntarily agreeing to participate in the study.

The researcher does not have a conflict of interest arising from employment, personal experience, or family circumstances. However, the researcher does have personal experience as a pet owner and has volunteered as an animal-assisted activity (AAA) team with a pet dog on a college campus. While the researcher believes that AAAs might be beneficial to certain audiences, the researcher's view includes a counter-balancing recognition that some people may not benefit from AAAs and others may be fearful of or allergic to AAA animals. Since this research focuses on ESAs, the researcher's personal experiences with animals fell outside the scope of this study.

Instruments

A relevant survey to answer the research questions could not be found in a comprehensive review of the current literature. Therefore, the ESA Policy and Staff Experiences Survey was researcher-developed. The ESA Policy and Staff Experiences Survey consisted of two sections: 1) components included in the campus's enacted policy, and 2) resulting staff experiences.

The literature review served as the basis for questions in both sections of the survey instrument. As the ESA Policy and Staff Experiences Survey was researcher-

developed, an expert panel reviewed the survey to examine validity. Then, the survey was piloted to identify problems in the survey instrument (Dillman et al., 2014) and to assess reliability.

Expert Panel

After development of the pilot survey, an expert panel reviewed the survey to determine the survey's validity. The expert panel consisted of three purposefully recruited people with ESA policy experience. Usry et al. (2018) suggest at least two experts to establish validity. Two panel members represented residence life and disability services from a small private institution while the third panel member represented disability services at a larger public institution. A fourth person, a consultant who "provides technical assistance and professional development activities to various segments of the higher education community surrounding issues of accommodation and support for students with disabilities" (Jarrow, 2017) provided feedback regarding question grouping and wording.

Validity and Reliability

When designing a new survey, validity and reliability need evaluated. "Validity is the accuracy of a measure or the extent to which a score truthfully represents a concept" (Zikmund et al., 2013, p. 303). The expert panel members reviewed the survey for face and content validity. Face validity is whether the survey seems to measure what was intended (Zikmund et al., 2013). And, content validity is the degree that the survey captures the scope, but not beyond, of what is to be measured (Zikmund et al., 2013).

"Reliability is an indicator of a measure's internal consistency" (Zikmund et al., 2013, p. 301). Cronbach's alpha was calculated from the pilot data to determine if there is

internal item reliability for the survey, see Pilot Survey Data Analysis. “The alpha formula is one of several analyses that may be used to gauge the reliability (i.e., accuracy) of psychological and educational measurements” (Cronbach & Shavelson, 2004, p. 392). “The coefficient demonstrates whether or not the different items converge…Coefficient alpha ranges in value from 0, meaning no consistency, to 1 meaning complete consistency” (Zikmund et al., 2013, p. 302). The desire is to have at least a .70 correlation which is considered a good reliability (Zikmund et al., 2013). “A coefficient between .80 and .95 are considered to have very good reliability (Zikmund et al., 2013, p. 302).

Pilot Survey

When a new survey instrument is developed, a pilot study is often essential (Dillman et al., 2014). A pilot study tests the survey in an attempt to identify problems such as nonresponse rates for questions and to identify questions that do not make sense to participants (Dillman et al., 2014). Specifically for Internet surveys, a pilot provides an opportunity “to test the entire survey process from start to finish and to assess its success in a number of useful ways” (Dillman et al., 2014, p. 343). One aspect is to test the ability to send participant specific survey links and reminder emails (Dillman et al, 2014).

The primary disability and residence life staff persons at 17 institutions in Ohio received the pilot survey recruitment email (Appendix B). Ohio was selected over other contiguous states to Pennsylvania as there were more similarities between Pennsylvania and Ohio when comparing data available from the U.S. Census Bureau (n.d.). A list of postsecondary institutions with on campus housing in Ohio was downloaded from the Integrated Postsecondary Education Data System (U.S. Department of Education,

National Center for Education Statistics, Integrated Postsecondary Education Data System, n.d.). Each institution received a random number using Microsoft Excel's random number function. Sorting of the list of institutions occurred based on the random number in ascending order. Each institution's website was reviewed to locate the email address of the primary residence life and disability services staff persons. If the institution did not have campus housing or both email addresses could not be found, that institution was not included in the pilot study. Email addresses continued to be collected until there were two email addresses for 17 institutions.

Determining the size of the pilot varies based on the author. A few flat rules of thumb include those by Browne (1995), Julious (2005), and Connelly (2008). Browne suggests a sample size of 30 for a pilot test whereas Julious suggests a sample size of 12. Connelly suggests using 10% of the sample for the project. As Browne suggests a larger pilot sample size, 15 institutions, or 30 people, were selected as the sample for the pilot survey. The pilot sample size was increased to 17 institutions, or 34 people, as specific email addresses for either the residence life or disability services staff for three intuitions could not be located which meant generic office email addresses needed to be used.

Data collection occurred via an Internet survey platform. The recruitment email (Appendix B) contained a link to the pilot survey (Appendix C) unique to each possible respondent. Respondents had three weeks to complete the pilot survey, from July 16, 2020 to August 6, 2020. Three participants fully completed the survey and one partially completed the survey within the first week. As Dillman et al. (2014) recommends sending reminder emails to increase response rates, one week after the recruitment email was sent, participants who had not yet completed the survey received the first reminder

email (Appendix D) which prompted two additional respondents to complete the survey. The second reminder email (Appendix E) was sent two weeks after the initial invitation which prompted one additional respondent to complete the survey. A final reminder (Appendix F) was sent two days prior to the closing of the survey which prompted one additional respondent to complete the survey for a total of seven completed responses. All emails were sent from a personal university email address rather than through the survey platform. This avoided the issue of emails going to SPAM folders as was experienced by Walsh (2020).

Pilot Survey Data Analysis. Analysis of the pilot survey consisted of examining the response rate, reliability of the survey, and respondent suggested changes.

Response Rate. The basic response rate calculation divides the number of completed responses by the number of eligible participants (Zikmund et al., 2013). Zikmund et al. (2013) continue on to explain, "Typically, the number in the denominator is adjusted for faulty addresses and similar problems that reduce the number of eligible participants" (p. 219). However, the American Association for Public Opinion Research (AAPOR) (2016) recommends further categorization of eligible participants.

The AAPOR (2016) describes six possible response rate calculations of which two are appropriate for the pilot study. Response Rate 1 (RR1) only considers completed responses in the numerator and eligible responses in the denominator (American Association for Public Opinion Research [AAPOR], 2016).

$$RR1 = \frac{\#\text{ completed}}{(\#\text{ completed} + \#\text{ partially completed}) + (\#\text{ refusals} + \#\text{ non-contact} + \#\text{ other}) + (\#\text{ undeliverable} + \#\text{ other})}$$

However, Response Rate 2 (RR2) includes the number of completed and partially completed in responses in the numerator (AAPOR, 2016).

$$RR2 = \frac{\#\text{ completed} + \#\text{ partially completed}}{(\#\text{ completed} + \#\text{ partially completed}) + (\#\text{ refusals} + \#\text{ non-contact} + \#\text{ other}) + (\#\text{ undeliverable} + \#\text{ other})}$$

The AAPOR (2016) defines the categories in the formulas as follows:

- Completion
    - Completed surveys – The respondent clicked the [Submit] button at the end of the survey (AAPOR, 2016).
    - Partially completed surveys – The respondent abandoned the survey prior to clicking the [Submit] button (AAPOR, 2016).
- Eligible, not returned
    - Refusals – The respondent "replies to the e-mail invitation stating that he or she does not want to participate in the survey" (AAPOR, 2016, p. 46).
    - Non-contact – The researcher receives an out of office email reply from the respondent's email account or "the questionnaire was returned after the close of the field period" (AAPOR, 2016, p. 46).
    - Other – This category "is reserved for all other eligible but non-completed cases" (AAPOR, 2016, p. 46).
- Unknown eligibility
    - Undeliverable – The researcher receives an email that the email address does not exist and as such the survey invitation is not able to be delivered (AAPOR, 2016).

  - Other – This category is deliberately broad to capture situations when the researcher is unsure of a respondent's eligibility and no questionnaire is returned (AAPOR, 2016).

- Not eligible – AAPOR (2016) describes the not eligible category as a respondent later found to be ineligible via a screening, duplicate listings, and quotas being met. For the purposes of the pilot survey, this refers to respondents who were ineligible due to no longer working for the institution.

The primary disability services and residence life staff at 17 institutions received the invitation email. There was one reply email indicating the respondent had left the institution as such that respondent was marked as ineligible. A total of seven respondents began the survey, six completed the survey and one respondent had a partially completed response. Based on the AAPOR (2016) formulas and the categories of returned surveys in Table 3.1, the RR1 and RR2 for the pilot survey were 18.2% and 21.2%.

Table 3.1

Pilot Survey Responses

Responses	Disability Services	Residence Life	Total
Emailed surveys			
Person specific address	12	16	28
Generic address	5	1	6
Total	17	17	34
Completion			
Completed	3	3	6
Partial	1		1
Total	4	3	7
Eligible, not returned			
Refusals		1	1
Non-contact			

Responses	Disability Services	Residence Life	Total
Other	11	12	23
Total	11	13	24
Unknown eligibility			
Undeliverable	1	1	2
Other			
Total	1	1	2
Not eligible	1		1
Response Rate 1	18.8%	17.6%	18.2%
Response Rate 2	25%	17.6%	21.2%

Disability services and residence life staff both completed the pilot survey. Email invitations (Appendix B) included the person's name as one way to personalize the invitation which can increase responses (Dillman et al., 2014). However, six email invitations were sent to generic, not person specific, email addresses so personalization was not possible. Two of the six generic email addresses completed the pilot survey. RR1 and RR2 for invitations sent to generic email addresses were both 33.3% which is greater than the overall response rates.

Two other factors may have impacted the response rate to the survey. The first is that the pilot survey occurred in July which is a popular vacation time. A total of nine out-of-office email replies were received indicating the respondent was on vacation. However, no respondent was out-of-the office for the entire period the survey was available. Disruptions caused by COVID-19 may also have impacted the response rate.

Reliability Results. Several statistical calculations produce a reliability, or internal consistency, measure (Cronbach & Shavelson, 2004; Helms et al., 2006). Using

Cronbach's alpha to determine reliability has become common practice in medical education research (Tavakol & Dennick, 2011), and psychological and social science research (Schmitt, 1996). As alpha "describes the extent to which measurements from a specific sample of respondents are replicated or consistent across a set of items " (Helms et al., 2006, p. 633), interpretation "does not describe the consistency of individuals' scores within a sample but rather the sample's response pattern as a whole" (Helms et al., 2006, p. 633).

Therefore, alpha was calculated on sets of survey questions rather than the entire survey for two reasons. One, the length of the survey may impact alpha; the longer the survey, the larger alpha becomes (Tavakol & Dennick, 2011). Secondly, alpha measures interrelatedness or internal consistency, not unidimensionality (Cronbach & Shavelson, 2004; Helms et al., 2006; Tavakol & Dennick, 2011). "Internal consistency refers to the interrelatedness of a set of items, whereas homogeneity refers to the unidimensionality of the set of items. Internal consistency is certainly necessary for homogeneity, but it is not sufficient" (Schmitt, 1996, p. 350). As the survey contains two distinct sections, enacted policy components and resulting staff experiences and distinct groupings within each section, multiple alphas were calculated in order to group similar constructs as shown in Table 3.2.

Table 3.2

Pilot Survey Reliability Measures

Construct	Pilot Survey Question Numbers	Number of Included Statements/ Questions	Number of Responses	Alpha
Enacted Policy Components	8, 11, 12, 17, 19, 20	47	5	.89
General Policy Components	8	7	7	.02
FAQs	11	3	7	.71
Animal Characteristics	12	9	7	.45
Documentation – Licensed Practitioner	17	8	5	.88
Documentation - Student	19	5	6	.47
Student Responsibilities	20	14	6	.90
Staff Experiences	38, 39, 45, 47, 49	33	5	.93
Staff Experiences	38	15	5	.91
Helpfulness of Policy in Responding to Situations	39	15	6	.96
Overall Experiences	45, 47, 49	3	6	.76

In order to calculate alpha, there must be more than one survey question in the construct and "a minimum of two people must have responded" (Helms et al., 2006, p. 634). Additionally, the included questions in the calculation must have a scaled response (Helms et al., 2006; Schmitt, 1996; Tavakol & Dennick, 2011). Therefore, not all questions from the pilot survey were included in the reliability analysis.

The statistical package used for analysis, Minitab, ignores a respondent's answers if any value in the construct is missing (Minitab 18 Support, n.d.). As not all respondents answered all questions, the number of included responses for each construct appears in the table. Additionally, the standardize variable option was selected for all calculations to prevent unequal weighting of questions due to varying scales (Minitab 18 Support, n.d.).

Zikmund et al. (2013) suggest that an alpha coefficient of at least .70 indicates a good reliability between the items in the construct. This occurs for six of the nine constructs. In regard to the three constructs that have an alpha coefficient less than .70, further consideration of the constructs demonstrates this was not of concern. For example, the general policy construct consists of questions investigating which categories of animals are defined in the policy, whether a student with an ESA is required to live in a particular residence hall, and if training is available to faculty and staff. While these questions are all grouped together under the construct of general policy, they measure different aspects of the policy. As such, having a low alpha coefficient is not concerning. Additionally, while the alphas did not meet Zikmund's recommendation, Schmitt (1996) suggests that constructs with lower alpha coefficients can still be quite useful.

Examination of the constructs with higher alpha coefficients (documentation – licensed practitioner, student responsibilities, staff experiences, and helpfulness of policy in responding to situations), shows each has a higher number of questions included in the analysis and as such the alpha coefficient may be inflated. As the intent was not to assign a score to these individual constructs or the survey as a whole, a possibly inflated alpha coefficient was not concerning.

The final construct of overall experiences consists of three questions and has a good reliability with an alpha coefficient of .76. This demonstrates for the pilot survey that the ratings from these three questions could be combined for analysis as there is internal consistency. However, as "alpha is a property of the scores on a test from a specific sample of testees" (Tavakol & Dennick, 2011, p. 53), the alpha coefficient for

the overall experiences construct needed calculated on the survey results to confirm the reliability was acceptable with that data and is included in Chapter IV.

Respondent Suggested Changes. The pilot survey requested respondents to provide feedback and recommendations about the survey for each section, enacted policy components, and staff experiences. The feedback and recommendations did not prompt changes to the survey. Pilot survey respondents also had the opportunity to describe any technology issues with the survey; no issues were reported. In addition, a prompt on the survey landing page asked respondents to note the time as the last question on the survey asked about how many minutes were needed to complete the survey. The reported completion time was compared to the time recorded by Survey Gizmo. This information spurred a change in regard to the estimated length of time to complete the survey, from approximately 30 minutes to approximately 15-30 minutes.

ESA Policy and Staff Experiences Survey Instrument

The ESA Policy and Staff Experiences Survey was developed as a relevant survey to answer the research questions could not be found in a comprehensive review of the current literature. The final survey instrument, see Appendix G, was based on the literature review, feedback from the expert panel, and the results of the pilot survey. For a crosswalk of each survey question to the literature source of the question, see Appendix H.

Questions in the first section of the survey focused on general ESA policy components such as how the policy was created, whether different categories of animals are defined, if an FAQ is available for students, etc. Additionally, questions about documentation requirements and student responsibilities were asked. Respondents

answered these questions using a scale of unsure, no, and yes. This section of the survey finished with respondents rating their campus's ESA policy on a five-point Likert scale of: very poor, below average, average, above average, and excellent.

The next section of the survey focused on staff experiences since ESA policy enactment. Example areas which emerged from the literature review include the number of ESA requests, false claims and documentation, misconceptions about rules by students, conflicting accommodation requests by students, and student benefits. Respondents first rated these experiences by how often they have experienced them on a scale of: never, very rarely, rarely, occasionally, frequently, and very frequently. Respondents then indicated how helpful the campus's ESA policy was in responding to the various situations on a scale of have not experienced the situation, not at all helpful, slightly helpful, moderately helpful, very helpful, and extremely helpful.

Three general ratings about staff experiences concluded the survey. One question asked respondents to rate how concerned they are about having complaints filed with the Office of Civil Rights or similar state or federal agency about the campus's ESA policies on a scale of: extremely concerned, moderately concerned, somewhat concerned, slightly concerned, or not at all concerned. A second question asked respondents how much time ESA requests, questions, and issues take up in comparison to other accommodation requests on a scale of: much less time, slightly less time, about the same of, slightly more time, and much more time. The final overall question asked respondents to rate whether they found the campus's ESA policy helpful in regard to responding to questions and situations on a scale of: not at all helpful, slightly helpful, moderately helpful, very helpful, and extremely helpful.

Data collection occurred via the same Internet survey platform as the pilot survey, Survey Gizmo which changed names to Alchemer between survey administrations. The recruitment email (Appendix I) contained a link to the survey unique to each possible respondent. Respondents had a little over three weeks to complete the survey, from October 20, 2020 to November 13, 2020. As with the pilot survey, reminder emails were sent at one week (Appendix J) and two weeks (Appendix K) after the initial email as way to increase response rates (Dillman et al., 2014). A final reminder (Appendix L) was sent two days prior to the closing of the survey. All emails were sent from a personal university email address rather than through the survey platform to avoid emails going to SPAM folders as was experienced by Walsh (2020).

Population

The population for this study included the primary disability services and residence life staff persons at postsecondary education institutions in Pennsylvania with campus housing. First, all open colleges/universities in Pennsylvania were identified via Pennsylvania's Department of Education website which lists all postsecondary and higher education degree-granting institutions that are approved to operate in Pennsylvania. Institutions with a category of administrative office, community college, other college and university, private licensed school, specialized associate degree, and theological seminary were removed from the list. These institutions were removed as they typically do not have on-campus housing. In addition, any institution with a county indication of out of state or only a satellite campus in Pennsylvania were removed. One-hundred and fifty-two possible campuses with housing remained.

Each campus's website was examined to determine if the campus did indeed have housing on campus and whether residence life and disability services staff were assigned to the campus. This was needed as in some instances satellite campus's residence life and disability services were administered through the main campus. The final number of postsecondary institutions in PA was 120 which included satellite locations with campus housing. Two institutions had co-directors, therefore a total of 242 people received an invitation email.

Data Analysis

Data analysis followed the steps suggested by Creswell (2014) and response rates were calculated using the AAPOR (2016) definitions. The two variables of the survey, ESA policy rating and the helpfulness of the campus's ESA policy in responding to questions and situations that arise, were considered interval level data. These variables met the definition of an interval scale as there were equal intervals between the number of items selected and the differences are meaningful (Howell, 2017, p. 600). Treating ratings on a Likert scale as interval level data is often done when there are five or more categories of response as "the differences between the different levels become so small…that only tiny errors could be introduced by assuming each interval is the same" (Zikmund et al., 2013).

Since both variables were on the interval scale and therefore continuous variables, the Pearson product-moment correlation could be calculated (Zikmund et al., 2013). A correlation coefficient is calculated to "measure of the relationship between the variables" (Howell, 2017, p. 598). A correlation coefficient answered research question

one examining if there is a relationship between enacted policy components and the resulting staff experiences.

While correlation analysis requires data to be interval in nature, regression "can accommodate less-than interval independent variables [however] the dependent variable must be continuous" (Zikmund et al., 2013, p. 561). As the majority of questions about policy enactment are ordinal variables, multiple regression analyses were performed to analyze whether particular policy components contributed to the overall experience after implementation, research question two.

Analysis of variance (ANOVA) was used to examine the impact of institutional and respondent characteristics on responses to ESA policy ratings and helpfulness of the ESA policy in responding to questions. ANOVA was used to examine this research question as it is "a statistical technique for testing differences in the means of several groups" (Howell, 2017, p. 598),

Limitations

Limitations of the study include the following:

- The sampling strategy was carried out to maximize obtaining a representative sample; however, that may not have occurred depending on the availability of contact information and which institutions responded to the survey (Linder et al., 2017). Thus, the responses may not fully represent the desired population.

- The survey was a self-report of the policy components and staff experiences. As such, there is a possibility that respondents indicated their policy contained a particular component when it did not (Linder et al., 2017) which could have altered the results of the study.

- The enacted policy may not be followed which could impact staff experiences (CDC, n.d.d), thus altering the results of the study.

Summary

Table 3.3 provides a summary of the theoretical framework components, research questions, survey questions, and anticipated analysis.

Table 3.3

Summary of Research Questions and Analysis

Theoretical Framework Component	Research Question	Survey Question	Analysis
Impact Evaluation - Establish a link between the enacted policy and experiences after implementation (CDC, n.d.d).	What is the relationship between ESA enacted policy components and resulting staff experiences? H_1: Enacted ESA policy impacts staff experiences. H_0: Enacted ESA policy does not impact staff experiences.	**Enacted policy components:** Question 27: On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campus's ESA policy? **Resulting staff experiences:** Question 48: How helpful have you found the campus's ESA policy in responding to questions and situations that arise?	Pearson product-moment correlation
Impact Evaluation - "Demonstrating the impact of the policy, by measuring changes in short-term, intermediate and long-term outcomes" (CDC, n.d.d, p. 1)	Which policy components contributed to staff experiences? H_1: There are specific enacted ESA policy components which impact staff experiences. H_0: There are not specific enacted ESA policy components which impact staff experiences.	**Enacted policy components:** Questions 2, 8, 10, 11, 12, 15, 19, 20, 21 **Resulting staff experiences:** Question 48. How helpful have you found the campus's ESA policy in responding to questions and situations that arise?	Multiple regression analysis

Theoretical Framework Component	Research Question	Survey Question	Analysis
Implementation Evaluation - "Documenting and comparing different intensities or variations of policy" (CDC, n.d.c, p. 1)	What differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences? H_1: Differences exist by institutional characteristics regarding enacted policy components. H_0: No differences exist by institutional characteristics regarding enacted policy components. H_2: Differences exist by respondent characteristics regarding enacted policy components. H_0: No differences exist by respondent characteristics regarding enacted policy components. H_3: Differences exist by institutional	**Institutional characteristics:** institution size, category, percent of students with a reported disability, percent of students that are not Caucasian, and county class **Respondent characteristics:** self-rated knowledge of the campus's ESA policy, how frequently the respondent references the policy, and length of time in current position **Each compared to:** **a) Enacted policy components:** Question 27: On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campuses ESA policy? **b) Resulting staff experiences:** Questions 32, 37, 48	Analysis of variance

Theoretical Framework Component	Research Question	Survey Question	Analysis
	characteristics regarding staff experiences. H_0: No differences exist by institutional characteristics regarding staff experiences. H_4: Differences exist by respondent characteristics regarding staff experiences. H_0: No differences exist by respondent characteristics regarding staff experiences.		

Chapter IV: Findings

In response to the trends, regulations, guidance, and litigation described in the literature review, many higher education institutions have created and enacted ESA policies and procedures. Journals focusing on disability and legal issues frequently describe what should be in the policy. However, a void seems to exist regarding what ESA policies and procedures have been enacted, the resulting staff experiences, and the relationship between them.

This void resulted in the following research questions being posed:

R1: What is the relationship between enacted ESA policy and resulting staff experiences?

H_1: Enacted ESA policy impacts staff experiences.

H_0: Enacted ESA policy does not impact staff experiences.

R2: Which enacted policy components contributed to staff experiences?

H_1: There are specific enacted ESA policy components which impact staff experiences.

H_0: There are not specific enacted ESA policy components which impact staff experiences.

R3: What differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences?

H_1: Differences exist by institutional characteristics regarding enacted policy components.

H_0: No differences exist by institutional characteristics regarding enacted policy components.

H_2: Differences exist by respondent characteristics regarding enacted policy components.

H_0: No differences exist by respondent characteristics regarding enacted policy components.

H_3: Differences exist by institutional characteristics regarding staff experiences.

H_0: No differences exist by institutional characteristics regarding staff experiences.

H_4: Differences exist by respondent characteristics regarding staff experiences.

H_0: No differences exist by respondent characteristics regarding staff experiences.

As there was no instrument available to survey institutions to answer these research questions, the ESA Policy and Staff Experiences Survey has been researcher-developed. This chapter examines the findings from the survey by first examining descriptive statistics and then presenting an analysis of the research questions.

Descriptive Statistics

Descriptive statistics describe a set of data (Howell, 2017). The descriptive statistics examined for this survey research include the response rate, institutional and respondent characteristics, and survey responses.

Response Rate

Initially, 242 email addresses were sent the survey invitation email. Six people responded indicating they were no longer in a role with disability services or residence life and provided contact information for their replacement. As such, the number of possible respondents did not change. When possible, email messages returned as undeliverable were updated with correct email addresses. This left only one email invitation that was undeliverable out of the 242 sent.

Automatic replies were received for two people who left their position for whom no replacement could be located on the campus's website. Two additional automatic replies were received indicating the person would be out of the office the entire length of the survey period. These respondents were classified as non-contacts. Six people replied indicating they would not be able to complete the survey and as such were coded as refusals.

Out of the 242 emails sent, 90 people completed the survey and 31 people began but did not complete the survey. Using the American Association for Public Opinion Research (AAPOR) (2016) formulas and the categories of returned surveys as shown in Table 4.1, Response Rate 1 (RR1) for the survey was 37.2% and Response Rate 2 was 50.0%. Since respondents could withdraw from the study at any time without any penalty by not submitting their response, partially completed surveys were not analyzed. Therefore, RR1 of 37.2% was used as the response rate for the survey which considers only completed responses in the numerator.

Table 4.1

Survey Responses

Responses	Disability Services	Residence Life	Total
Emailed surveys			
Person specific address	112	109	221
Generic address	9	12	21
Total	121	121	242
Completion			
Completed	50	40	90
Partial	12	19	31
Total	62	59	121
Eligible, not returned			
Refusals	5	1	6
Non-contact	1	1	2
Other	52	58	110
Total	58	60	118
Unknown eligibility			
Undeliverable	1	0	1
Other	0	0	0
Total	1	0	1
Not eligible	0	2	2
Response Rate 1	41.3%	33.1%	37.2%
Response Rate 2	51.2%	48.8%	50.0%

As with the pilot survey, a small number of email addresses were generic email addresses not associated with a person's name. Twenty-one email invitations were sent to generic, not person specific addresses. Eleven respondents with a generic email address completed the survey and one respondent partially completed the survey. RR1 and RR2 for invitations sent to generic email addresses were 47.6% and 52.4%, respectively. As the generic email address response rates are greater than the overall response rates, no

concerns existed regarding the use of generic email addresses not associated with a person's name.

Institutional Characteristics

The institutional population consisted of 120 institutions in Pennsylvania that had campus housing. Respondents represented 77 of those 120 institutions. Table 4.2 lists the institutional characteristics obtained from the Integrated Postsecondary Education Data System. The county class of where the institution was located was obtained from the County Commissioner's Association of Pennsylvania. Table 4.2 includes the information for the institutional population, institutions represented by the respondents, and the total number of respondents.

Table 4.2

Institutional Characteristics

Institutional Characteristics	Institutional Population	Institutions with at Least One Respondent	Total Number of Respondents
Institutional Size			
Very Small (under 1,000)	24	12	13
Small (1,000 – 4,999)	74	54	65
Medium (5,000 – 9,999)	13	6	7
Large (10,000 – 19,999)	4	2	2
Very Large (20,000 and above)	5	3	3
Total	120	77	90
Institution Category			
College of Technology	1	1	1
Private College and University	80	56	65
Private State-Aided Institution	5	3	3
Private Two-Year College	1	1	1
State University	14	8	9
State-Related Commonwealth University	19	8	11
Total	120	77	90

Institutional Characteristics	Institutional Population	Institutions with at Least One Respondent	Total Number of Respondents
Highest Degree Granted			
Associate	4	3	3
Baccalaureate	44	25	33
Special Focus Four-Year	8	6	6
Master	46	31	34
Doctoral	18	12	14
Total	120	77	90
Percentage of Students with a Disability*			
3% or less	20	13	15
4% up to 7%	37	19	21
7% up to 10%	32	22	23
10% or greater	31	23	31
Total	120	77	90
Percentage of Minoritized Students*			
14% or less	27	17	20
15% up to 22%	33	25	31
22% up to 30%	29	17	20
30% or greater	31	18	19
Total	120	77	90
County Class**			
First	14	8	8
Second	30	20	23
Third	44	28	33
Fourth	13	9	11
Fifth	8	3	4
Sixth	9	7	8
Seventh	2	2	3
Eighth	0	0	0
Total	120	77	90

* Quartiles were calculated to create the ranges.
** See Appendix M for the population size of each county class.

To determine if more responses were received in a particular institutional characteristic category, a chi-square analysis was performed as the data is categorical in nature. No statistical significance was found for any of the institutional characteristic categories. As such, one can assume that a particular characteristic within a category is not overrepresented by either the institutions with at least one respondent or by the total number of respondents.

Respondents' Characteristics

The survey invitation was emailed to the primary residence life and disability services staff at 120 institutions. As one institution had residence life co-directors and one had disability services co-directors, the population consisted of 242 people. Table 4.3 lists the institutional characteristics by the respondent population, role, and total respondents.

Table 4.3

Respondent's Institutional Characteristics

Institutional Characteristics	Population	Respondents		
		Disability Services	Residence Life	Total Respondents
Institutional Size				
Very Small (under 1,000)	49	6	7	13
Small (1,000 – 4,999)	149	36	29	65
Medium (5,000 – 9,999)	26	4	3	7
Large (10,000 – 19,999)	8	2	0	2
Very Large (20,000 and above)	10	2	1	3
Total	242	50	40	90
Institution Category				
College of Technology	2	1	0	1
Private College and University	162	33	32	65

Institutional Characteristics	Population	Respondents		
		Disability Services	Residence Life	Total Respondents
Private State-Aided Institution	10	1	2	3
Private Two-Year College	2	1	0	1
State University	28	6	3	9
State-Related Commonwealth University	38	8	3	11
Total	242	50	40	90
Highest Degree Granted				
Associate	8	3	0	3
Baccalaureate	89	16	17	33
Special Focus Four-Year	17	1	5	6
Master	92	21	13	34
Doctoral	36	9	5	14
Total	242	50	40	90
Percentage of Students with a Disability*				
3% or less	41	9	6	15
4% up to 7%	74	14	7	21
7% up to 10%	64	14	9	23
10% or greater	63	13	18	31
Total	242	50	40	90
Percentage of Minoritized Students*				
14% or less	54	10	10	20
15% up to 22%	67	18	13	31
22% up to 30%	58	11	9	20
30% or greater	63	11	8	19
Total	242	50	40	90
County Class**				
First	29	3	5	8
Second	60	14	9	23
Third	89	18	15	33
Fourth	26	7	4	11
Fifth	16	2	2	4
Sixth	18	4	4	8
Seventh	4	2	1	3

Institutional Characteristics	Population	Respondents		
		Disability Services	Residence Life	Total Respondents
Eighth	0	0	0	0
Total	242	50	40	90

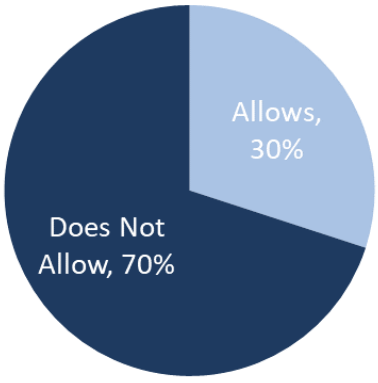
* Quartiles were calculated to create the ranges.
** See Appendix M for the population size of each county class.

To determine if more responses were received in a particular institutional characteristic category, a chi-square analysis was performed. No statistical significance was found for any of the institutional characteristic categories. As such, one can assume that a particular characteristic within a category is not overrepresented by either their role or by the total number of respondents.

The ESA Policy and Staff Experiences Survey asked respondents if their campus allowed dogs and/or cats in the residence halls. As shown in Figure 4.1, 30% of the respondents indicated that their institution does allow dogs and/or cats in the residence halls. As the number of responses was not statistically significant by the respondent's role, Figure 4.1 is based on the total number of responses.

Figure 4.1

Percentage of Respondent's Campuses that Allow Dogs and/or Cats



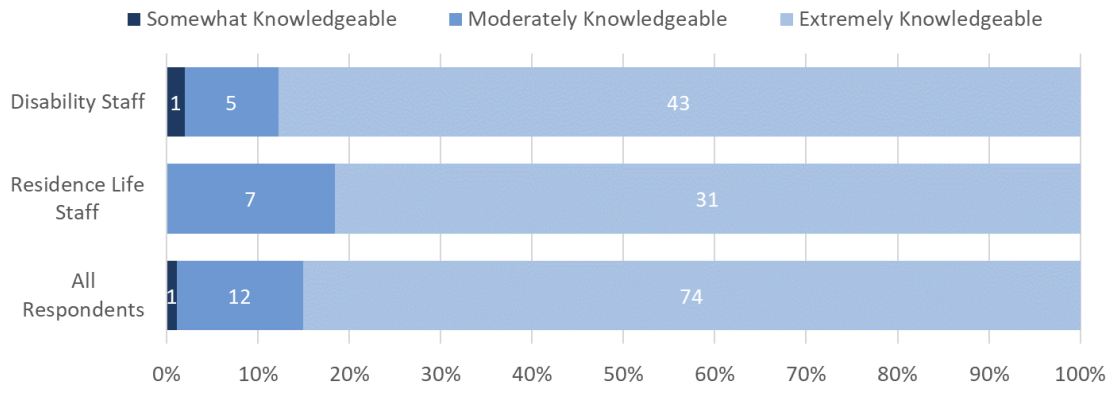
Two questions in the beginning of the survey did not allow respondents to complete the survey. The first question asked whether the respondent's institution had an ESA policy. Two respondents, one with the role of disability services and one with the role of residence life answered 'No' to this question. Of the two campuses that reported not having an ESA policy, one stated they were not "aware of policies and laws around this area" and the other stated their institution deals with the issue on a case by case basis.

The second question that did not allow respondents to continue completing the survey asked about their knowledge of the campus's ESA policy which was evaluated a five-point scale. If the respondent answered 'Not at All Knowledgeable' or 'Slightly Knowledgeable', the survey ended. One respondent with the role of residence life selected 'Slightly Knowledgeable' and as such was not allowed to continue the survey. With the survey ending for these three respondents, the number of respondents who completed the entire survey was 87.

Of the 87 respondents who completed the entire survey, 49 represented disability services and 38 represented residence life. The majority of respondents indicated that they are extremely knowledgeable about their campus's ESA policies as shown in Figure 4.2. No significant difference via a chi-square analysis was found between respondents' roles and knowledge level.

Figure 4.2

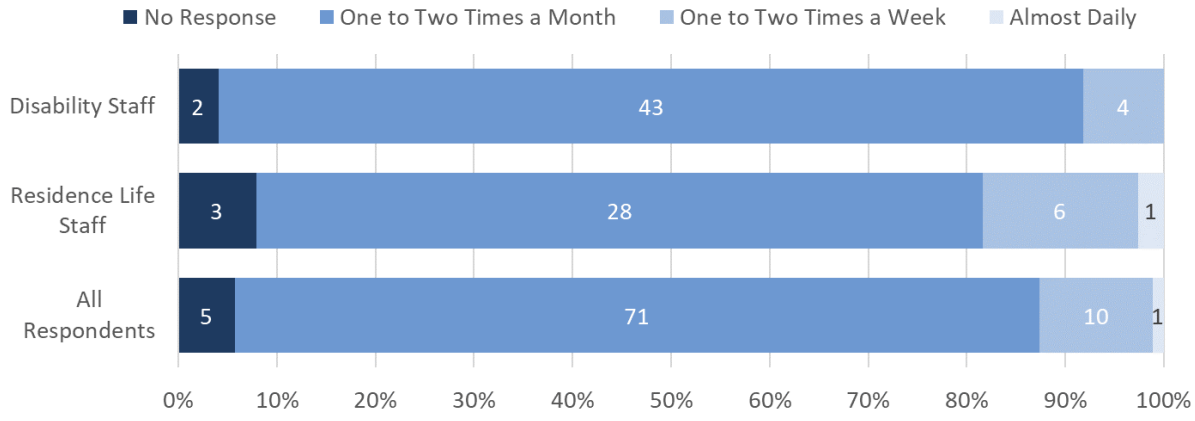
Respondent Knowledge of Campus's ESA Policy



There was also a question on the survey that asked how frequently respondents reference the campus's ESA policy. The majority of participants selected 'One to Two Times a Month' followed by 'Almost Daily'. As shown in Figure 4.3, five respondents did not answer the question and one respondent indicated he or she references the ESA policy almost daily.

Figure 4.3

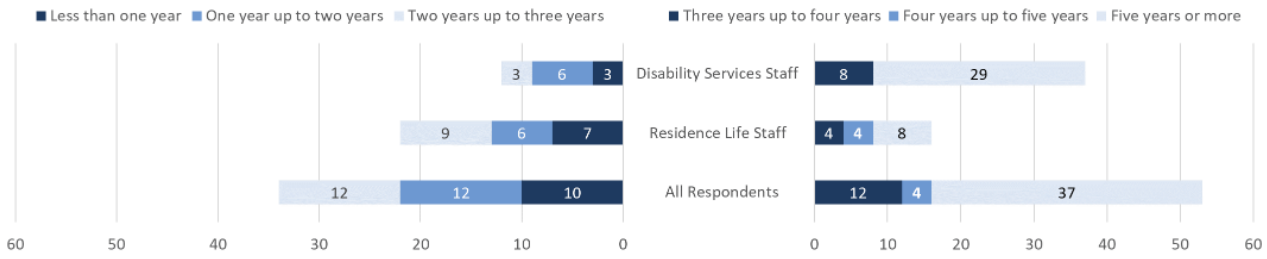
How Frequently Respondents Reference the ESA Policy



Respondents were also asked to indicate how long they were in their current position. There is a visual difference and statistical difference ($X^2(5) = 20.79$, $p = .01$) in how disability and residence life staff responded to this question as shown in Figure 4.4. The majority of disability services staff indicated they have been in their position for three years or more. In contrast, the majority of residence life staff responding to the survey indicated they have been in their position less than three years.

Figure 4.4

Length of Time in Current Position



Survey Responses

For the questions used in hypothesis testing, the descriptive statistics of range, mean, and median are presented in Table 4.4. A few questions included sub-questions about a topic area such as student responsibilities. For these questions, a percentage was calculated for each question based on the number of sub-questions. A full explanation of this calculation is discussed with the examination of the second research question.

Table 4.4

Survey Question Descriptive Statistics

Survey Question	Total Responses	Range	Mean	Median
ESA Policy Questions				
8: General policy components	87	28.6% - 100%	65.2%	66.7%
10: Number of departments that participated in development of ESA policy	79	0 – 8	3.8	4.0
11: FAQs	85	0.00% - 100%	20.2%	0.00%
12: Animal characteristics	87	0.00% - 100%	67.6%	66.7%
19: Documentation – Student	83	0.00% - 100%	61.8%	60.0%
20: Student Responsibilities	86	50.0% - 100%	84.0%	85.7%
27: On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campus's ESA policy?	87	3 – 5	3.8	4.0
Staff Experiences				
32: How many students with ESAs were on campus last year, the 2019-2020 academic year?	81	0 - 75	11.2	8
44: In comparison to other complaints being filed with the Office for Civil Rights or similar state or federal agency, how concerned are you about having complaints filed about the campus's ESA policies?	87	1 – 5	1.8	2.0
46: In comparison to other accommodation requests, how much time do ESA requests, questions, and issues take?	87	1 – 5	3.2	3.0

Survey Question	Total Responses	Range	Mean	Median
48: How helpful have you found the campus's ESA policy in responding to questions and situations that arise?	87	2 – 5	3.9	4.0

Three questions about the ESA policy used in hypothesis testing did not have any sub-questions and had categorical response options as shown in Table 4.5. Therefore, only counts of responses could be calculated which is shown in Figure 4.5.

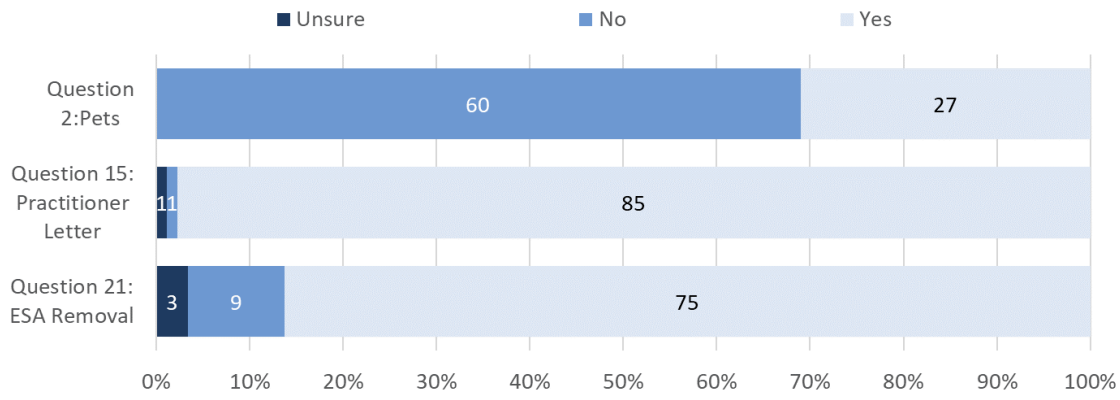
Table 4.5

ESA Policy Questions with Categorical Responses

Survey Question Number	Survey Question	Rating Scale
2	Are students allowed to have pets such as dogs and/or cats in the residence halls?	Yes No Unsure
15	Does the campus ESA policy require a statement or letter from a licensed physical health or mental health care practitioner?	Yes No Unsure
21	Does the policy describe a process for an ESA to be removed from campus under certain situations?	Yes No Unsure

Figure 4.5

ESA Policy Question Response Distribution



Hypothesis Testing

In testing the hypotheses, Likert scale questions were treated as interval scale data as there were equal intervals between the number of items selected and the differences were meaningful (Howell, 2017, p. 600). Treating ratings on a Likert scale as interval level data is often done when there are five or more categories of response as "the differences between the different levels become so small…that only tiny errors could be introduced by assuming each interval is the same" (Zikmund et al., 2013). The statistical package used for analysis was Minitab.

Research Question One*: *What is the relationship between enacted ESA policy and resulting staff experiences?

The first research question examined if there was a correlation between the enacted policy and staff experiences after policy implementation which supports the theoretical framework component of impact evaluation. On a scale of 1 to 5 with 5 being the best and 1 being the worst, the research question examined the relationship between questions 27, 'How would you rate the campus's ESA policy?' and Question 48, 'How

helpful have you found the campus's ESA policy in responding to questions and situations that arise?'.

As questions 44, 46, and 48 (see Table 4.6) of the pilot survey demonstrated an internal consistency with an alpha of .76, the possibility of combining the questions for an overall experience rating was considered. However, as "alpha is a property of the scores on a test from a specific sample of testees" (Tavakol & Dennick, 2011, p. 53), alpha was calculated for the survey responses as well. The internal consistency between the three questions did not hold for the responses to the survey as the alpha was .073[7]. Due to the low alpha, the three questions were not combined for analysis and instead were examined separately.

Table 4.6

Overall Experience Questions

Survey Question Number	Survey Question	Rating Scale
44	In comparison to other complaints being filed with the Office for Civil Rights or similar state or federal agency, how concerned are you about having complaints filed about the campus's ESA policies?	Not at All Concerned to Extremely Concerned
46	In comparison to other accommodation requests, how much time do ESA requests, questions, and issues take?	Much Less Time to Much More Time
48	How helpful have you found the campus's ESA policy in responding to questions and situations that arise?	Not at All Helpful to Extremely Helpful

[7] An alpha coefficient of at least .70 indicates a good reliability between the items in the construct (Zikmund et al., 2013).

To answer this research question, a correlation coefficient was calculated which measures the relationship between two variables (Howell, 2017). Using a 95% confidence interval, the Pearson product-moment correlation coefficient for question 27 with questions 44, 46, and 48 were calculated. The null hypothesis for each pairing was that there would be no correlation between the questions. As shown in Table 4.7, there was a significant correlation between question 27 and questions 44 and 48. The correlation between questions 27 and 44 was negative and between questions 27 and 48 was positive. As such, the null hypothesis was rejected and the alternative hypothesis that enacted ESA policy impacts staff experiences was accepted.

Table 4.7

Correlations between Enacted ESA Policy and Staff Experiences

Questions Examined	*r*	*p*	Null Hypothesis
27 and 44	-.269	.012	Rejected
27 and 46	.176	.102	Accepted
27 and 48	.535	.000	Rejected

While the correlation coefficients were significant between question 27 and questions 44 and 48, the effect sizes are different. The effect size between questions 27 and 44 is considered a small effect size as *r* is between .10 and .30 (Cohen as cited in Brydges, 2019). The effect size between questions 27 and 48 is considered a large effect size as r is .50 or greater (Cohen as cited in Brydges, 2019).

Research Question Two: Which enacted policy components contributed to staff experiences?

This research question examined which policy components contributed to how helpful the respondents found the campus's ESA policy in responding to questions and situations. This question supports the theoretical framework component of impact evaluation by "Demonstrating the impact of the policy, by measuring changes in short-term, intermediate and long-term outcomes" (CDC, n.d.d, p. 1).

To answer this question, multiple regression analyses were completed which use multiple variables to predict which ones contribute to the outcome (Howell, 2017) which in this case is the helpfulness of the campus's ESA policy in responding to questions and situations that arise. As many policy questions were composed of sub-questions related to that topic, a percentage was generated for each question based on the number of sub-questions. Table 4.8 lists each policy question with the total number of sub-questions. Respondents' percentages for each question were calculated based on sub-questions answered with 'Yes' or 'No' response. Sub-questions not answered or answered as 'unsure' were not included in respondents' percentages. Questions with only one sub-question which were not answered or answered as 'unsure' were coded as missing values. The reasoning for not including sub-questions that were not answered or answered as 'unsure' was not to decrease the score due to the respondent not knowing or answering that particular sub-question. However, this does mean that the other sub-questions that were answered were weighted slightly more in comparison to respondents who answered all sub-questions.

Table 4.8

Number of Elements in Each Policy Component

Survey Question Number	Question	Possible Number of Sub-questions
2	Are students allowed to have pets such as dogs and/or cats in the residence halls?	1
8	General policy components	**7**
10	Number of departments that participated in development of ESA policy	1
11	FAQs	3
12	Animal characteristics	9
15	Does the campus ESA policy require a statement or letter from a licensed physical health or mental health care practitioner?	1
19	Documentation – Student	5
20	Student Responsibilities	14
21	Does the policy describe a process for an ESA to be removed from campus under certain situations?	1

The results of the regression analysis indicated that the predictors explained 6.25% of the variance, and no predictor was statistically significant, see Table 4.9. Therefore, the null hypothesis is accepted that there are not specific enacted ESA policy components which impact staff experiences.

Table 4.9

Regression Analysis

Question	*b*	*SE*	*t*	*p*
2: Pets	-0.11	0.19	-0.59	.555
8: General policy	0.09	0.55	0.16	.873
10: Policy development involvement	-0.09	0.06	-1.47	.147
11: FAQs available	-0.04	0.30	-0.14	.887
12: Animal characteristics	0.33	0.46	0.70	.484
15: Licensed practitioner letter	0.11	0.76	0.14	.888
19: Student documentation	-0.18	0.49	-0.38	.708
20: Student responsibilities	0.50	0.70	0.72	.476
21: ESA removal	0.10	0.31	0.32	.750

Research Question Three*: *What differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences?

The third research question examined what differences, if any, exist by institutional and respondent characteristics regarding the respondents' rating of the enacted policy (question 27) and the resulting experiences (questions 32, 37, and 48). This research question supports the theoretical framework component of implementation evaluation. Analysis of variance (ANOVA) was used to examine this research question as it is "a statistical technique for testing differences in the means of several groups" (Howell, 2017, p. 598).

Hypothesis One: **Differences Exist by Institutional Characteristics Regarding Enacted Policy Components.** This hypothesis examined the effect of institutional characteristics regarding question 27, the rating of the enacted policy. The main effect of institutional characteristics was not significant for enacted policy components, see table 4.10. Therefore, the null hypothesis is accepted that there are no differences by institutional characteristic in regard to the rating of the enacted policy.

Table 4.10

Hypothesis One ANOVA Results

Institutional Characteristics	*F*	*p*
Institution Size	1.54	.201
Institution Category	0.93	.467
Highest Degree Granted	0.45	.773
Percentage of Students with a Disability	0.87	.463
Percentage of Minoritized Students	2.29	.087
County Class	0.40	.873

Hypothesis Two: **Differences Exist by Respondent Characteristics Regarding Enacted Policy Components.** Hypothesis two examined the effect of respondent characteristics to question 27, the rating of the enacted policy. The main effect of respondent characteristics was significant for knowledge of the campus's ESA policy, $F(2, 71) = 3.95$, $p = .024$. See Table 4.11 for all respondent characteristic results. The 'Extremely Knowledgeable' response had the highest mean ($M = 3.830$, $SE = 0.200$), followed by 'Moderately Knowledgeable' ($M = 3.408$, $SE = 0.262$), and then 'Somewhat Knowledgeable' ($M = 2.899$, $SE = 0.575$).

Table 4.11

Hypothesis Two ANOVA Results

Respondent Characteristics	*F*	*p*
Position	0.44	.511
Years in Position	0.73	.603
Knowledge of Policy	3.95	.024
Policy Reference Frequency	0.64	.529

Hypothesis Three: **Differences Exist by Institutional Characteristics Regarding Staff Experiences.** This hypothesis examined institutional characteristics by three staff experiences: 1) question 32 which asks the number of ESAs on campus last year, 2) an average rating for question 37 which asks how frequently respondents experienced various situations the past two academic years, and 3) question 48 which asks how helpful respondents have found the ESA policy.

Number of ESAs. In regard to the number of ESAs on campus last year, the main effect of institutional characteristics was significant for county class, $F(6, 55) = 3.33$, $p = .007$. See Table 4.12 for all respondent characteristic results and Table 4.13 for the means of the county class characteristic.

Table 4.12

Hypothesis Three - Number of ESAs ANOVA Results

Institutional Characteristics	*F*	*p*
Institution Size	0.22	.928
Institution Category	0.07	.997
Highest Degree Granted	0.10	.981
Percentage of Students with a Disability	0.09	.967
Percentage of Minoritized Students	0.56	.642
County Class	3.33	.007

Table 4.13

Number of ESAs and County Class ANOVA Means

County Class	*M*	*SE*
First	6.62	8.11
Second	11.35	7.42
Third	10.23	6.00
Fourth	8.86	7.42
Fifth	6.84	9.09
Sixth	16.74	7.41
Seventh	41.60	9.10

Situations Experienced. In examining question 37 about situations respondents experienced, the main effect of institutional characteristics was significant for institution size, $F(4, 60) = 4.33$, $p = .004$. See Table 4.14 for all respondent characteristic results and Table 4.15 for the means of the institution size characteristic.

Table 4.14

Hypothesis Three - Situations Experienced ANOVA Results

Institutional Characteristics	*F*	*p*
Institution Size	4.33	.004
Institution Category	0.39	.854
Highest Degree Granted	0.42	.797
Percentage of Students with a Disability	0.09	.965
Percentage of Minoritized Students	0.42	.738
County Class	0.86	.526

Table 4.15

Situations Experienced and Institution Size ANOVA Means

County Class	*M*	*SE*
Very Small	0.15	0.39
Small	1.38	0.26
Medium	1.32	0.41
Large	2.28	0.64
Very Large	1.56	0.66

Policy Helpfulness. The main effect of institutional characteristics was not significant for policy helpfulness, see table 4.16.

Table 4.16

Hypothesis Three – Policy Helpfulness ANOVA Results

Institutional Characteristics	*F*	*p*
Institution Size	1.71	.159
Institution Category	0.53	.750
Highest Degree Granted	0.75	.560
Percentage of Students with a Disability	0.73	.537
Percentage of Minoritized Students	1.21	.314
County Class	1.60	.161

Hypothesis Three Summary. Hypothesis three examined three staff experiences by institutional characteristic which included the number of ESAs on campus, situations experienced, and policy helpfulness. The null hypothesis in all situations was that there was no difference regarding institutional characteristics. For the number of ESAs on campus, the null hypothesis is rejected as there was a significant effect for county class. Regarding situations experienced, the null hypothesis was also rejected as there was a significant effect for institution size. However for policy helpfulness, the null hypothesis was accepted that there was no difference by institutional characteristic as no significant effect was found.

Hypothesis Four: **Differences Exist by Respondent Characteristics Regarding Staff Experiences.** This hypothesis examined the same three staff experiences as hypothesis three, only they are compared to respondent characteristics.

Number of ESAs. In regard to the number of ESAs on campus last year, the main effect of respondent characteristics was significant for how frequently respondents reference the policy, $F(2, 65) = 14.99$, $p = .000$. See Table 4.17 for all respondent characteristic results and Table 4.18 for the means of the policy reference frequency characteristic.

Table 4.17

Hypothesis Four - Number of ESAs ANOVA Results

Respondent Characteristics	*F*	*p*
Position	0.02	.890
Years in Position	1.10	.367
Knowledge of Policy	1.70	.192
Policy Reference Frequency	14.99	.000

Table 4.18

Number of ESAs and Policy Reference Frequency ANOVA Means

Policy Reference Frequency	*M*	*SE*
Almost Daily	1.90	11.50
One to Two Times a Week	26.43	4.91
One to Two Times a Month	7.18	3.87

Situations Experienced. In examining question 37 about situations respondents experienced, the main effect of respondents' characteristics was not significant for situations experienced, see table 4.19.

Table 4.19

Hypothesis Four - Situations Experienced ANOVA Results

Respondent Characteristics	*F*	*p*
Position	2.02	.159
Years in Position	0.15	.981
Knowledge of Policy	1.39	.256
Policy Reference Frequency	2.26	.112

Policy Helpfulness. The main effect of respondents' characteristics was significant for respondents' knowledge of the policy, $F(2, 71) = 3.87$, $p = .025$. See Table 4.20 for all respondent characteristics. In regard to the respondents' knowledge of the policy, the 'Extremely Knowledgeable' response had the highest mean ($M = 3.746$, $SE = 0.243$), followed by 'Moderately Knowledgeable' ($M = 3.250$, $SE = 0.319$), and then 'Somewhat Knowledgeable' ($M = 2.594$, $SE = 0.698$).

Table 4.20

Hypothesis Four – Policy Helpfulness ANOVA Results

Respondent Characteristics	*F*	*p*
Position	0.06	.801
Years in Position	2.14	.071
Knowledge of Policy	3.87	.025
Policy Reference Frequency	2.59	.082

Hypothesis Four Summary. Hypothesis four examined three staff experiences by respondent characteristic which included the number of ESAs on campus, situations experienced, and policy helpfulness. The null hypothesis in all situations was that there was no difference regarding respondent characteristics. For the number of ESAs on campus, the null hypothesis was rejected as there was a significant effect for policy reference frequency. Regarding situations experienced, the null hypothesis was accepted as no significant effect was found. For the third staff experience, policy helpfulness, the

null hypothesis was rejected as there was a significant effect for policy knowledge of policy.

Hypothesis Testing Summary

Each research question is listed along with the hypotheses and findings.

1. What is the relationship between ESA enacted policy components and resulting staff experiences?

   H_1: Enacted ESA policy impacts staff experiences.

   H_0: Enacted ESA policy does not impact staff experiences.

   a) Relationship between questions 27 (policy) and 44 (complaint concern)

      - The null hypothesis is rejected, $p = .012$
      - Small negative effect size, $r = -.269$

   b) Relationship between questions 27 (policy) and 46 (time)

      - The null hypothesis is accepted as $p > .05$

   c) Relationship between questions 27 (policy) and 48 (policy helpfulness)

      - The null hypothesis is rejected, $p = .000$
      - Large positive effect size, $r = .535$

2. Which policy components contributed to staff experiences?

   H_1: There are specific enacted ESA policy components which impact staff experiences.

   H_0: There are not specific enacted ESA policy components which impact staff experiences.

a) Enacted policy (questions 2, 8, 10, 11, 12, 15, 19, 20, 21); Staff experiences (question 48 - Policy helpfulness)

b) The null hypothesis is accepted as $p > .05$

3. What differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences?

H_1: Differences exist by institutional characteristics regarding enacted policy components.

H_0: No differences exist by institutional characteristics regarding enacted policy components.

a) Question 27 (Policy rating); institutional characteristics

b) The null hypothesis is accepted as $p > .05$

H_2: Differences exist by respondent characteristics regarding enacted policy components.

H_0: No differences exist by respondent characteristics regarding enacted policy components.

a) Question 27 (Policy rating) and respondent characteristics

b) The null hypothesis is rejected, $p = .024$ for knowledge of policy

H_3: Differences exist by institutional characteristics regarding staff experiences.

H_0: No differences exist by institutional characteristics regarding staff experiences.

a) Question 32 (Number of ESAs); institutional characteristics

- The null hypothesis is rejected, $p = .007$ for county class

b) Question 37 (situations experienced); institutional characteristics

- The null hypothesis is rejected, $p = .004$ for institution size

c) Question 48 (policy helpfulness); institutional characteristics

- The null hypothesis is accepted as $p > .05$

H_4: Differences exist by respondent characteristics regarding staff experiences.

H_0: No differences exist by respondent characteristics regarding staff experiences.

a) Question 32 (Number of ESAs); respondent characteristics

- The null hypothesis is rejected, $p = .000$ for policy reference frequency

b) Question 37 (situations experienced); respondent characteristics

- The null hypothesis is accepted as $p > .05$

c) Question 48 (policy helpfulness); respondent characteristics

- The null hypothesis is rejected, $p = .025$ for knowledge of policy

Chapter V: Discussion

Stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). In addition, students are reporting decreasing emotional health (Higher Education Research Institute, 2011). Students with mental health disabilities may have emotional support animals (ESAs) which assist them to participate in college. Benefits associated with ESAs include: to reduce anxiety (Yamamoto & Hart, 2019) and to "provide companionship, relieve loneliness, and sometimes help with depression, anxiety, and certain phobias" (Brennan & Nguyen, 2014, section III).

As ESAs mitigate the impact of a disability, college campuses receive requests for ESAs and the number of requests has increased (Bauer-Wolf, 2019; Clark, 2017). Journals focusing on disability and legal issues frequently describe what should be in policies to respond to ESA requests. However, only one research study by Kogan et al. (2016), with a sole focus of counseling centers, was located that examined what is occurring around policy enactment. Due to the lack of studies surrounding ESA policies, a void appears to exist as to what policies and procedures have been enacted about ESAs and the resulting staff experiences.

In order to investigate this apparent void, the Centers for Disease Control and Prevention's (CDC) evaluation framework for policy evaluation was used in the current study. This chapter first examines the survey results based on the CDC framework followed by the research question findings. The chapter then concludes with recommendations for practice, study limitations, and recommendations for future research.

CDC Policy Evaluation Framework Findings

The CDC describes policy evaluation as applying "methods to examine the content, implementation or impact of a policy" (CDC, n.d.a, p. 1). The CDC (2017a) describes the framework as "a practical, nonprescriptive tool, designed to summarize and organize essential elements of program evaluation" (para. 1). After an extensive review of the literature, the CDC framework best matched the intent of the study and provided the best framework for examining enacted ESA policies and resulting staff experiences in comparison to other possible frameworks.

The stages of policy development as suggested by the CDC (n.d.a) were adapted to examine the literature regarding ESAs. Policy development typically involves the stages of problem identification, policy analysis, strategy and policy development, policy enactment, and policy implementation (CDC, n.d.a). As the first three areas of the CDC framework were not a focus of the research, just a brief statement about each is included here followed by a more in-depth examination of policy enactment and implementation.

Regarding policy identification, there are concerning trends that provide evidence that the physical and mental health of Millennials and Generation Z are decreasing. In addition, the increasing number of students with anxiety and stress is concerning as stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). The policy analysis stage examined both sides of two controversies about ESAs, that other treatment options can be pursued (Phillips, 2016) and that the research is not conclusive that animals are helpful to humans (Brulliard, 2017). The strategy and policy development stage focused on regulations and resulting guidance from the DOJ and HUD as well as litigation that have supported the notion that

a person with a disability that limits one or more major life activities has a right to have an ESA in campus housing regardless of the pet policy.

The last two stages of the CDC framework, policy enactment and policy implementation, were the focus of this research. Policy enactment examines the various aspects of an ESA policy while policy implementation explores some of the impacts of ESA policies.

Policy Enactment

Policy enactment, or policy content, "focuses on identifying the specific policy elements that are likely to be effective" (Brownson et al., 2009, p. 1579). For the purposes of this research, policy enactment focused on what should be included in ESA policies based on regulations, litigation, and the resulting guidance. The survey results about general policy considerations are examined first, followed by documentation recommendations, and then student responsibilities.

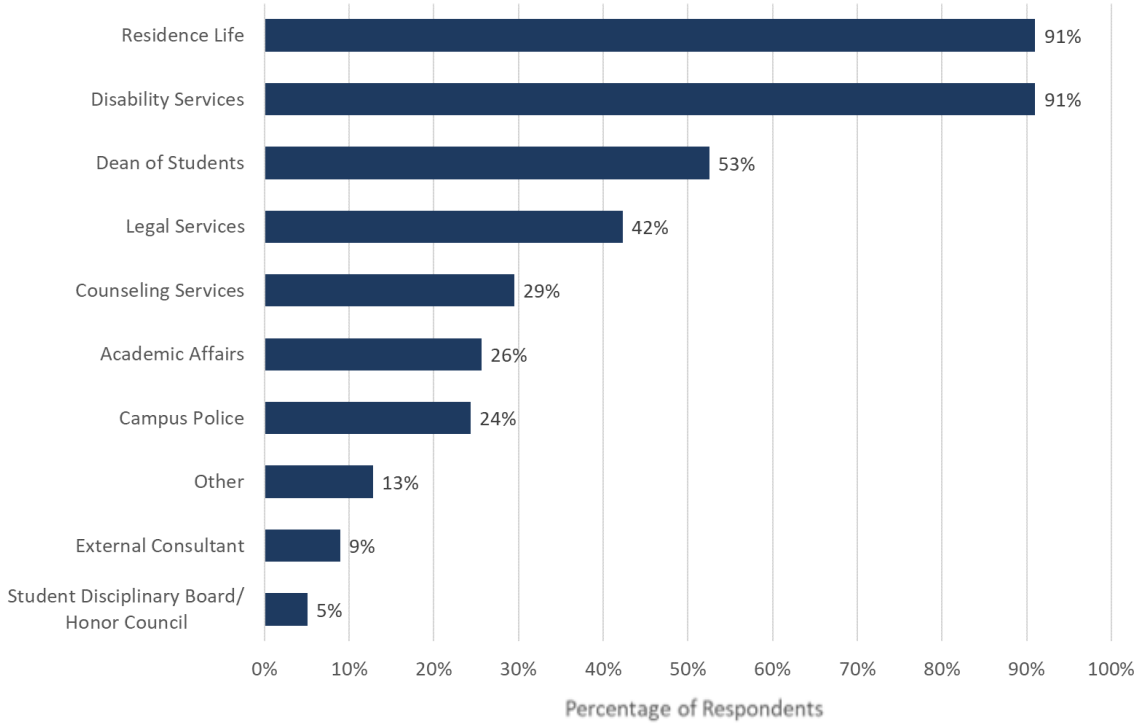
General Policy Considerations. The Fair Housing Act (FHA) does not require that housing providers have formal policies in place for accommodation requests (DOJ & HUD, 2004). However, institutions should have a policy so that there is a process to review accommodation requests for ESAs. The findings of the current survey indicate that campuses have enacted ESA policies as 97.4% (75 out of 77 responding campuses) reported having an ESA policy. Of the two campuses that reported not having an ESA policy, one stated they were not "aware of policies and laws around this area" and the other stated their institution deals with the issue on a case by case basis. Both institutions were categorized as very small which may play a role in the campuses not having an ESA policy.

While the ESA policy may mirror the service animal policy, there are distinct differences for ESA policies to consider (Huss, 2012). Seventy-seven percent of the respondents indicated that their campus's ESA policy is a separate policy from the other policies such as service animals. While 22% indicated their campus's ESA policy is not separate (1% were unsure); this could potentially leave the institution open to legal challenges. As long as the policy differentiates between an ESA and a service animal, a lawsuit, such as the one by the Department of Justice (DOJ) against Kent State University for denying an ESA request based on the service animal policy (Sutton, 2016), should not occur.

Institutions may approach creating an ESA policy differently; however, there are some commonalities regarding who is involved in the committee creating the policy. Possible committee membership as described by Kogan et al. (2016) and Adams et al. (2017) was included as a question on the survey. While eight respondents did not know who was involved in the development of the campus's ESA policy and one did not answer the question, the other respondents did know and the results are in Figure 5.1. Not surprisingly, committee membership most often included residence life and disability services which are the two areas most impacted by ESAs on campus. Other areas mentioned included facilities, student affairs, policy committee, and compliance/liability officer. Adams et al. (2017) suggest that counseling centers should be involved in the ESA policy development as they may be asked to write letters indicating a student's need for an ESA. However, only 29% of the survey respondents indicated this occurred.

Figure 5.1

Committee Membership for ESA Policy Development



Note. Based on 86 responses.

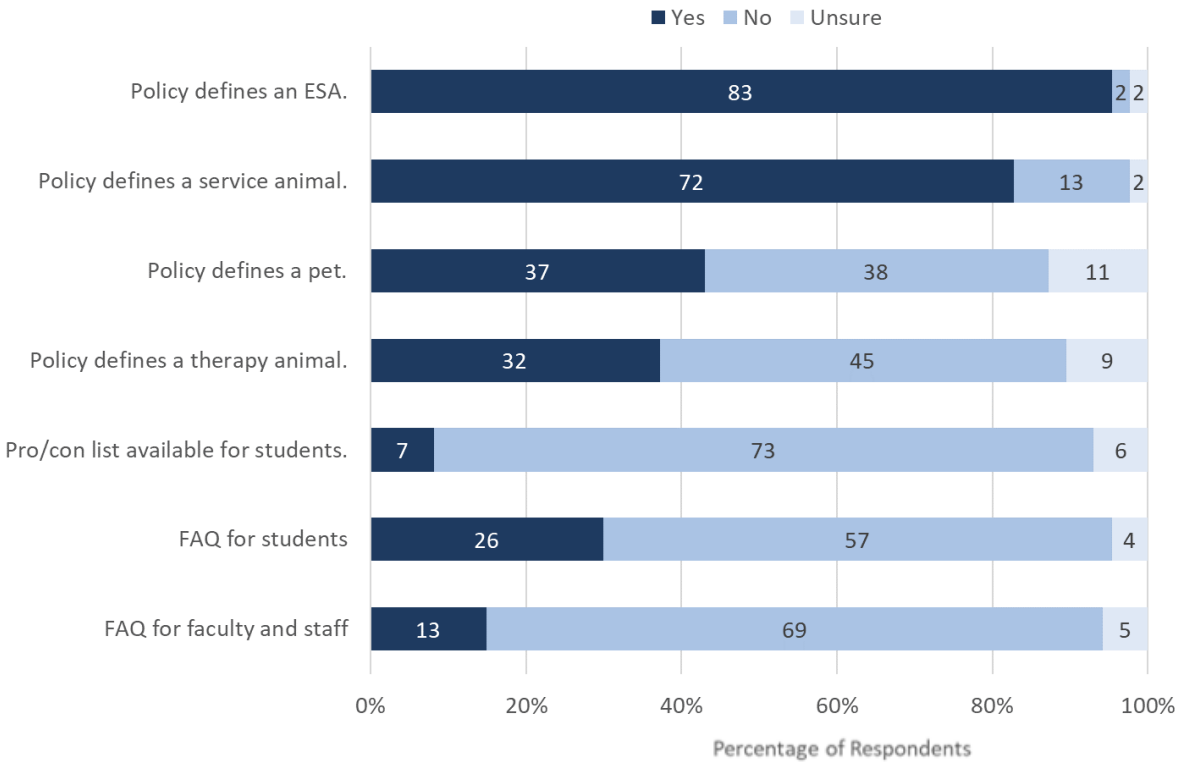
As the differences between a service animal, ESA, and pet therapy can create confusion, Kogan et al. (2016) suggest defining these terms, having a pro/con list about having an animal on campus, and a document available listing frequently asked questions. Ninety-five percent of the respondents indicated their policy defines an ESA and 83% indicated their policy defines a service animal. Clearly defining these two terms may help to decrease confusion by students and staff regarding these two animal categories.

Interestingly, Figure 5.2 shows the three lowest respondents indicated are included in their policies are a pro/con list about having animals on campus and an FAQ for students and one for faculty and staff. One might assume that a pro/con list would be helpful for students when deciding whether to have an ESA on campus (Meredith

College, personal communication, January 17, 2020) and that an FAQ document for students or staff could be useful. While the information that would be in these items is most likely contained within the policy itself, reading the information in a different format may further decrease misunderstandings, such as where an ESA is allowed on campus, thereby decreasing resulting staff experiences.

Figure 5.2

Available Information

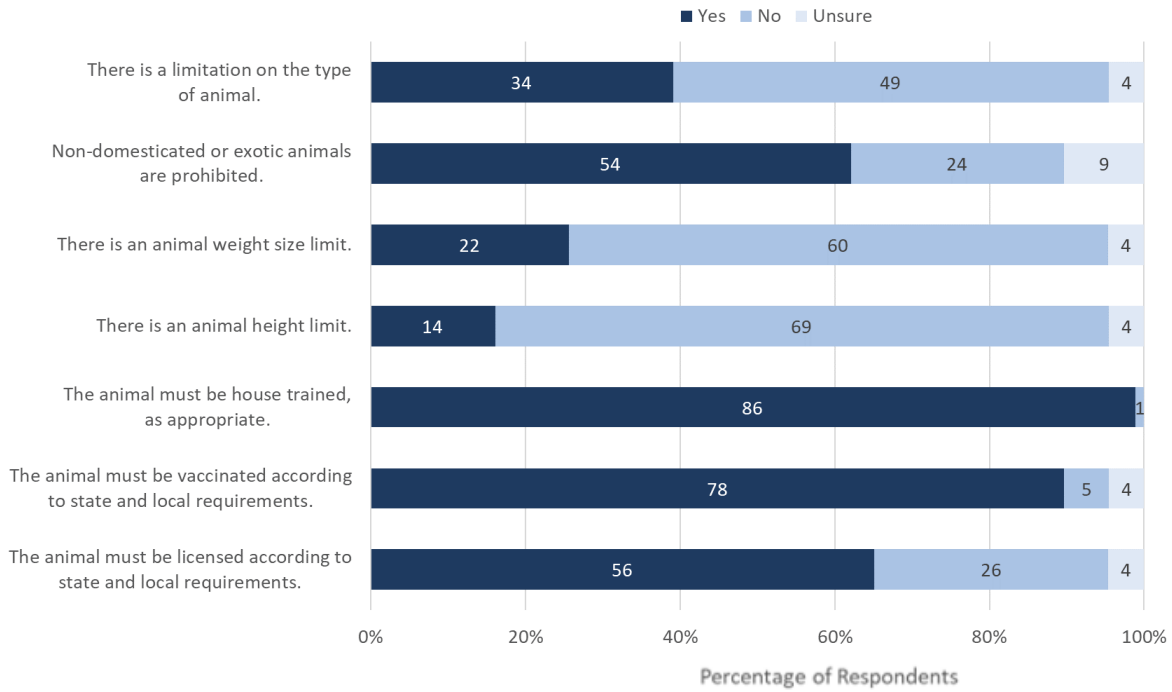


Turning now to the type of animal that can be an ESA, the FHA does not restrict the type of assistance animal; however, animals can be limited to domesticated animals and not include more exotic species (Huss, 2012). The results of this survey indicate that 62% of the respondents' campuses prohibit non-domesticated and exotic species. Policies can also include requirements that the animal be housebroken and able to reasonably live

with others (Masinter, 2015; NACUA, 2011). Not surprisingly, 99% of the respondents indicated this is a requirement in their campus's policy.

Figure 5.3

Animal Restrictions



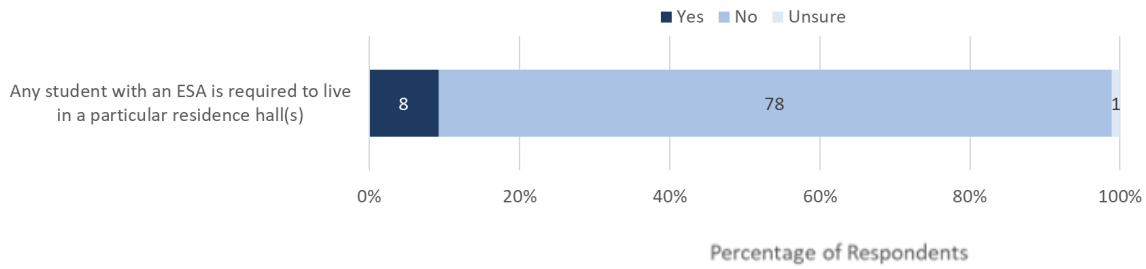
Note. Statements are shortened here, please see Appendix G for the full statements.

Additional animal requirements could be based on the size of the animal and whether vaccinations are up to date (Masinter, 2015). While policies must be cautious when restricting the type of ESA, the finding, as shown in Figure 5.3, that most policies do not restrict the size of the animal based on height or weight except for special exceptions is somewhat surprising. Another interesting finding is that 25% more campuses require ESAs to have vaccinations than licenses. While vaccinations minimize health and safety concerns, both requirements meet state and local requirements. As such, one may have presumed the difference between these two requirements would have been smaller.

While limitations can be placed on the type of animal that is allowed, students who request to have an ESA on campus cannot be limited to a particular residence hall (Hope, 2016). As shown in Figure 5.4, there is a handful of respondents that answered students are limited to a particular residence hall. This raises a red flag for those institutions; however, how this requirement is described in the policy and why is unknown which means assumptions about this finding cannot be made without further information.

Figure 5.4

Students Restricted to a Particular Residence Hall

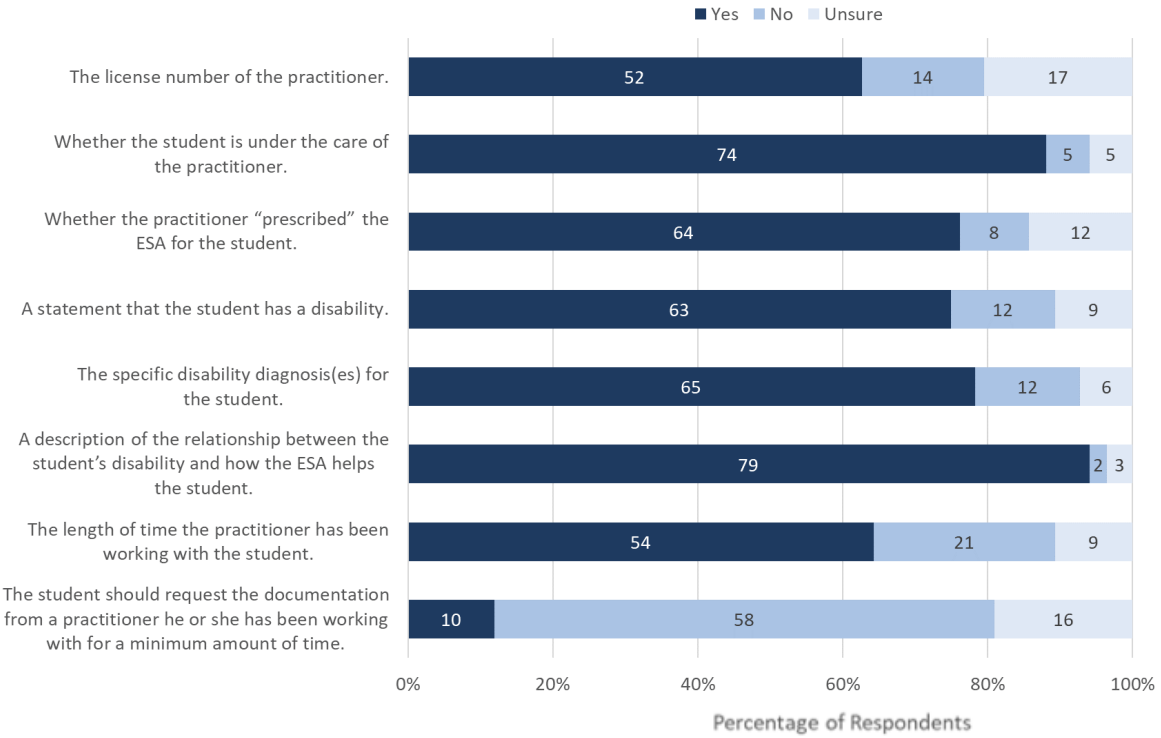


Documentation. Documentation can indicate the student has a disability, that the animal is needed, and demonstrate the relationship between the disability and the accommodation (DOJ & HUD, 2004). The responses to this survey, as shown in Figure 5.5, illustrate that 75% of the policies require a statement that the student has a disability and 94% of the policies require a description of the relationship between the disability and how the ESA helps the student. Requiring this documentation from a licensed provider that is currently caring for the student is acceptable (Chandler, 2019) and may help to decrease the number of students who purchased their letters from an Internet site falsely claiming their pet is an ESA. Only one respondent indicated that their campus does not require a letter from a licensed provider.

However, burdensome or overly intrusive information should not be asked of the student (*U.S.A. v. University of Nebraska at Kearny*, 2013) such as asking for the student's disability diagnosis when all that is needed is a statement that the student has a disability (Chandler, 2019). One concerning finding in Figure 5.5 is that 78% of the respondents indicated that the campus's ESA policy requires the documentation to include the specific disability diagnosis(es) for the student. This is concerning as in *U.S.A. v. University of Nebraska at Kearny*, the "DOJ determined that the university discriminated against the student by requiring 'detailed disability information that goes beyond what is needed to review a request for reasonable accommodation in housing'" (Von Bergen, 2015, p. 19).

Figure 5.5

Documentation Requirements



Student Responsibilities. Campus policy should "place the responsibility for supervising, controlling and caring for animals on the users" (Shackelford, 2013). This can be enforced via a contract with the student which describes the expectations (Adams et al., 2017). As shown in Figure 5.6, 81% of the respondents indicated that students approved to have an ESA must sign a contract.

Figure 5.6

Contract Required by Students with ESAs

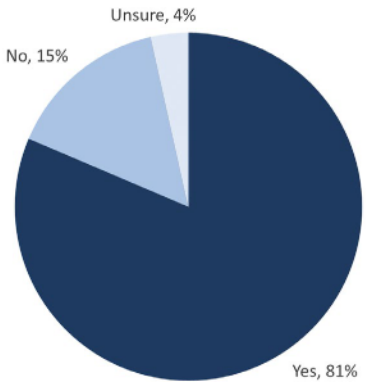
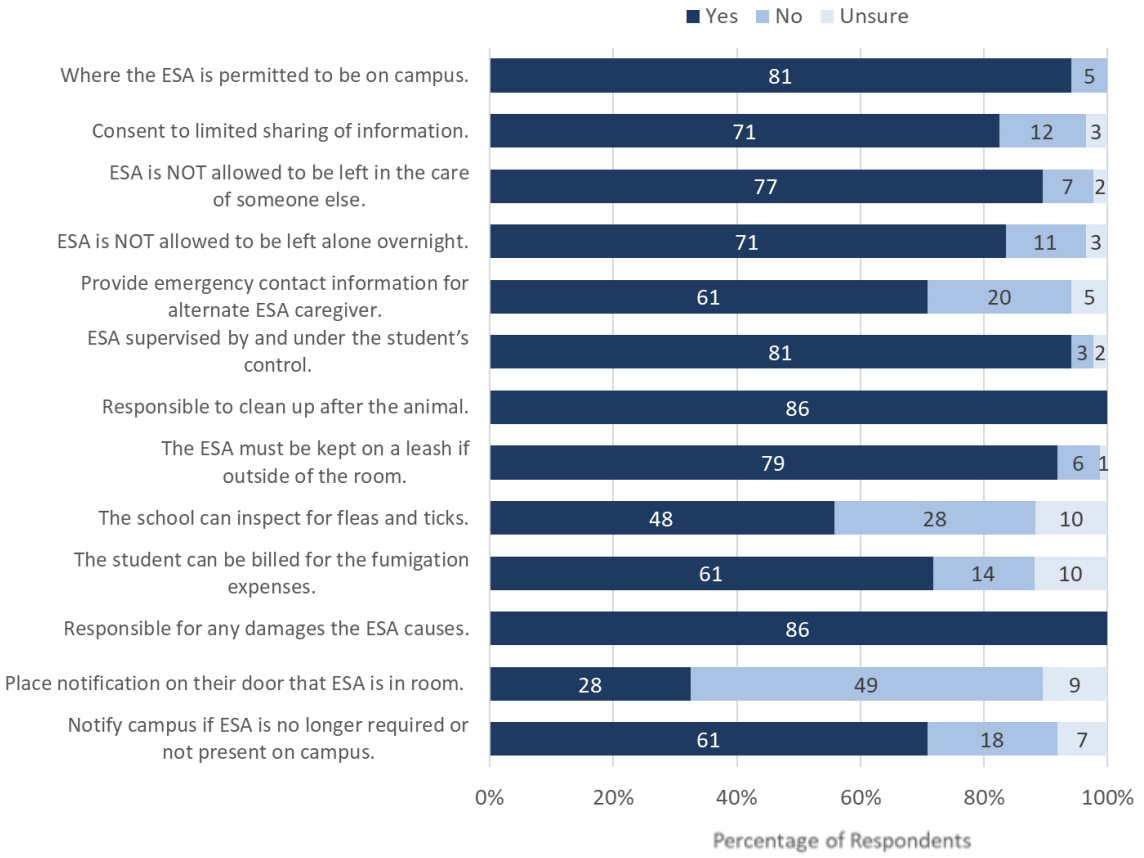


Figure 5.7 shows the responses to other student responsibilities asked about in the survey. Not surprisingly, all respondents indicated that students with ESAs are responsible to clean up after the animal and are responsible for any damages to the room or furniture caused by the animal. However, less than 90% of respondents indicated other similar responsibilities such as not leaving the animal in the care of someone else or alone overnight. Clearly requiring these responsibilities of students may decrease some of the related staff experiences.

Figure 5.7

Student Responsibilities

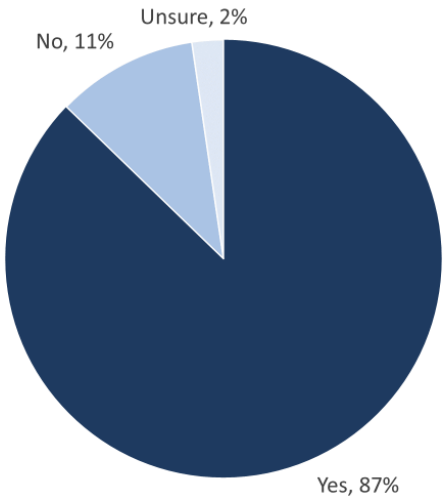


Note. Statements are shortened here, please see Appendix G for the full statements.

The final component examined in the survey regarding policy enactment was whether the ESA policy describes a process for an ESA to be removed from campus. This is allowed in a number of circumstances such as a breach of contract (Adams et al., 2017), if the animal is mistreated (Masinter, 2015), or if the animal is extremely disruptive or if the student is unable to mitigate disturbances (Salminen & Gregory, 2018). As shown in Figure 5.8, 87% of the respondents indicated their campus's ESA policy has a process to remove the animal from campus under certain circumstances. As this is an acceptable component of the policy according to the literature, it is interesting that all policies do not contain this.

Figure 5.8

Policy Describes ESA Removal Process

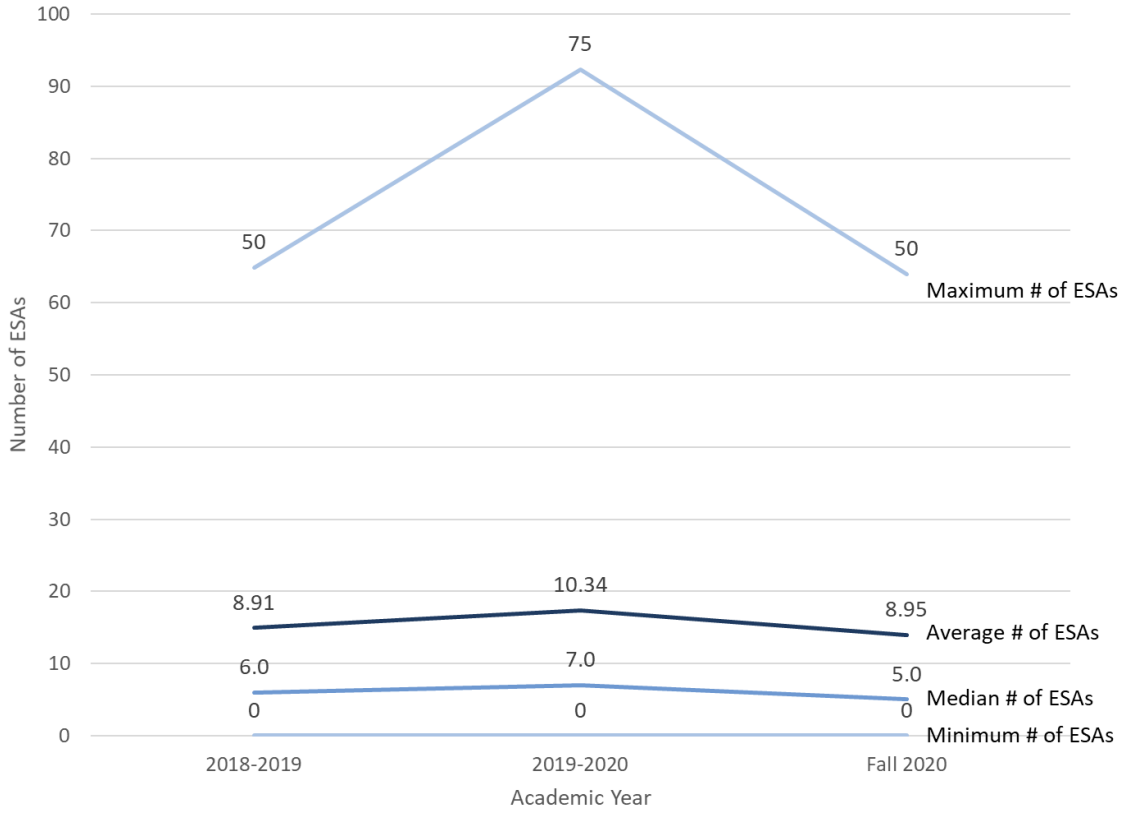


Policy Implementation

The final stage of the CDC Framework, policy implementation, explores impacts of ESA policies based on literature review findings. One impact is the increasing number of ESA requests (Bauer-Wolf, 2019; Clark, 2017). Based on a national survey, Clark (2017) reported a 358% increase in the number of college students reporting that they used an ESA. These survey results partially support Clark's (2017) finding. As shown in Figure 5.9, the average number of students requesting ESAs increased from the 2018-2019 academic year to the 2019-2020 year and then decreased in the fall term of 2020. The decrease from the 2019-2020 academic year to the fall of 2020 could be due to reporting on only half a year as the spring 2021 term was not included. Additionally, the COVID-19 pandemic may have impacted the fall 2020 numbers.

Figure 5.9

Number of ESAs by Academic Year

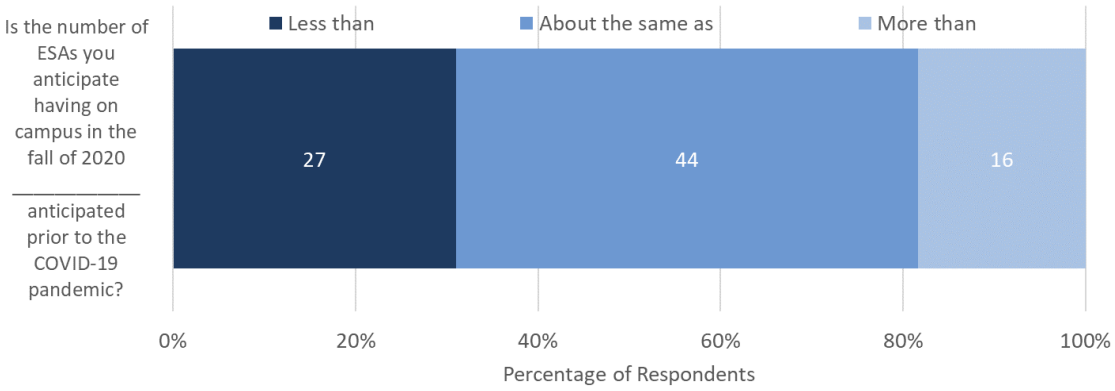


Note. Based on 64 responses that completed all three questions.

To account for the potential impact of COVID-19, respondents indicated whether the number of ESAs anticipated on campus in the fall of 2020 changed due to the pandemic. Figure 5.10 shows that the majority of respondents (51%) did not expect any change due to the pandemic. This leads one to the conclusion that the pandemic may not have significantly impacted the number of ESAs on campus in the fall of 2020.

Figure 5.10

Anticipated Change in Number of ESAs due to Pandemic

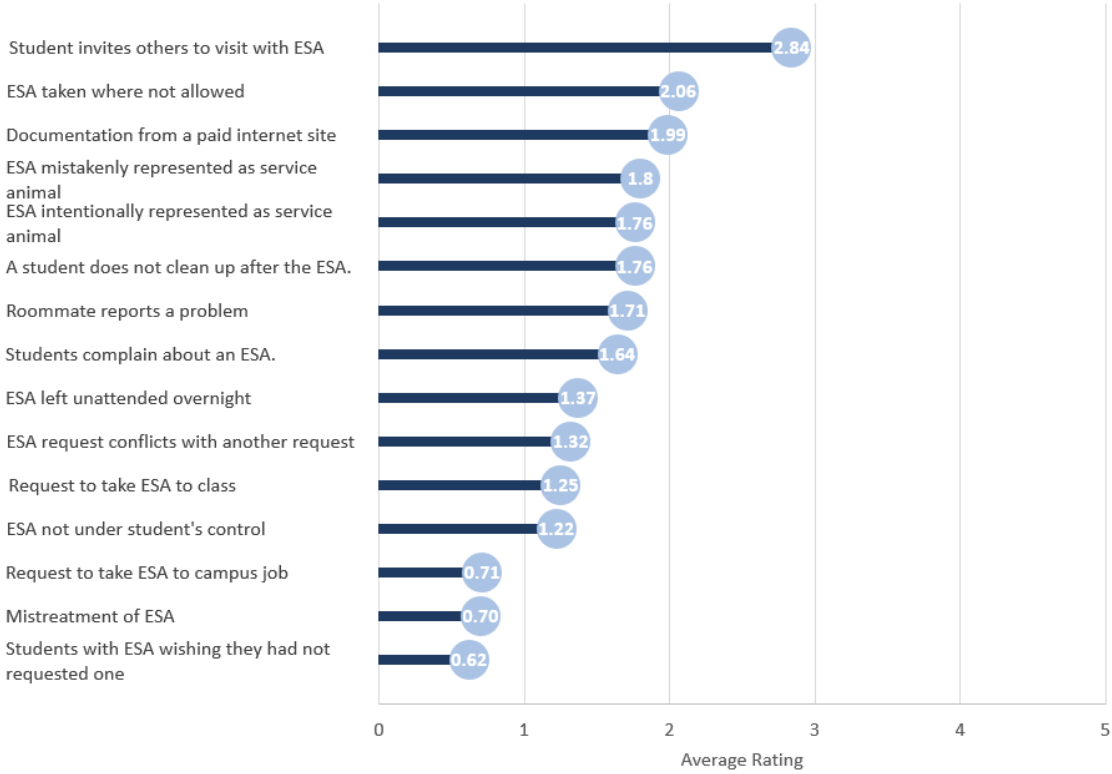


The last question of the survey asked respondents what they saw as the future of ESAs on campus in the next 5, 10, and/or 20 years. Out of the 60 responses to the question, 36 respondents indicated they anticipate the number of ESAs on campus will increase, 6 anticipate the numbers staying the same, 3 anticipate the number of ESAs decreasing, and 3 were unsure. There were also four respondents that envision their campus moving to a more inclusive pet policy. These responses support Bauer-Wolf's (2019) and Clark's (2017) findings that the number of ESAs on campuses will continue to increase.

Additional survey questions about policy implementation impacts or situations staff have experienced are included in Figure 5.11. The situation experienced the most is students with ESAs inviting other students to visit with their ESA. Other impacts experienced frequently and described in the literature include ESAs being taken where they are not allowed (Chandler, 2019), using a paid internet site for documentation (Taylor, 2016), and students either mistakenly (Schoenfeld-Tacher et al., 2017) or intentionally (Masinter, 2019) representing the ESA as a service animal.

Figure 5.11

Situations Experienced

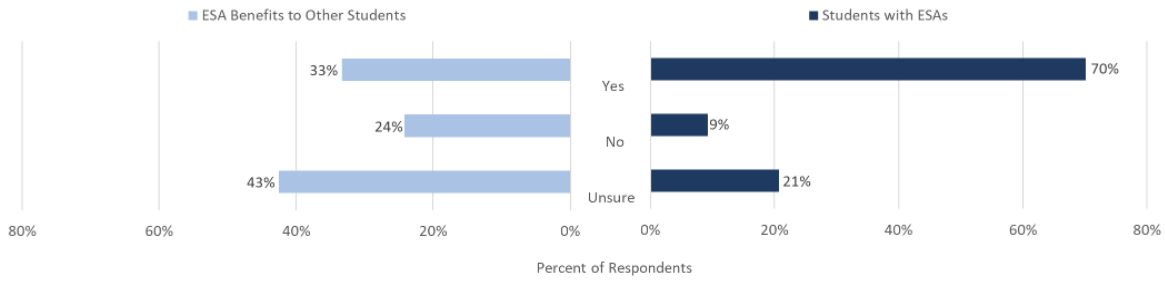


Note. The average rating is based on a scale of Never (0) to Very Frequently (5). Statements are shortened here, please see Appendix G for the full statements.

An additional impact of ESA policies asked about on the survey, based on the respondents' experiences, was whether the student with the ESA or other students benefit from the ESA. As shown in Figure 5.12, 70% of respondents indicated students with ESAs appear to benefit from having an ESA.

Figure 5.12

Benefits of ESAs to Students



Research Question Findings

In researching ESA policies on college campuses, only one research study by Kogan et al. (2016), with a sole focus of counseling centers, was located that examined what is occurring around ESA policy enactment. As such, the intent of this study was to investigate: the relationship between ESA enacted policy components and resulting staff experiences; which policy components contributed to staff experiences; and what differences, if any, exist by institutional and respondent characteristics regarding enacted policy components or resulting staff experiences.

Research Question 1 Findings

Regarding the relationship between the policy rating (question 27) and the staff experience of a complaint concern (question 44), the finding of a negative correlation, though a small effect size, seems logical as the stronger the policy the less concern there is about a complaint being filed with the Office for Civil Rights or similar state or federal agency. The lack of a relationship between the policy rating and amount of time staff spend on ESA accommodations as compared to other accommodations (question 46) demonstrates that staff are not spending more time on ESA requests as is often anecdotally heard. The positive relationship found between the policy rating and policy

helpfulness (question 48) also seems logical as the stronger the policy, the more helpful the policy is in responding to requests and situations.

Research Question 2 Findings

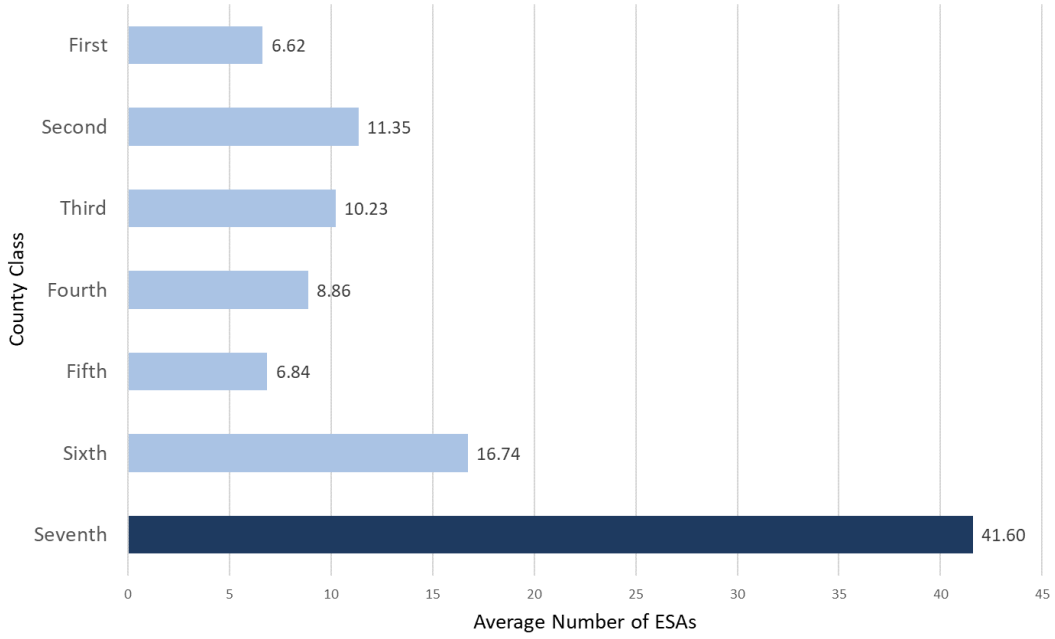
While no one policy component was found to contribute to staff experiences more than another, this could indicate that ESA policies do not have one component that influences staff experiences more than another. Additionally, this finding could demonstrate the importance of tailoring an ESA policy to the campus characteristics, and as such in aggregate one policy component does not contribute more than another.

Research Question 3 Findings

Statistical differences were found based on institutional and respondent characteristics regarding enacted policy components and resulting staff experiences. Focusing on institutional characteristics first, these impacted the staff experiences of the number of ESAs on campus and the situations experienced (question 37). In examining the difference in the number of ESAs due to the county class where the campus is located (p = .007), Figure 5.13 demonstrates that county class seven had the highest mean. However, there are only three responding campuses in county class seven and the range in the number of ESAs is 62. This is the largest range as the other county classes have ranges between 5 and 35. While a statistically significant difference exists, the significance of the results is questionable due to the small number of campuses in class seven counties and the large range in the responses.

Figure 5.13

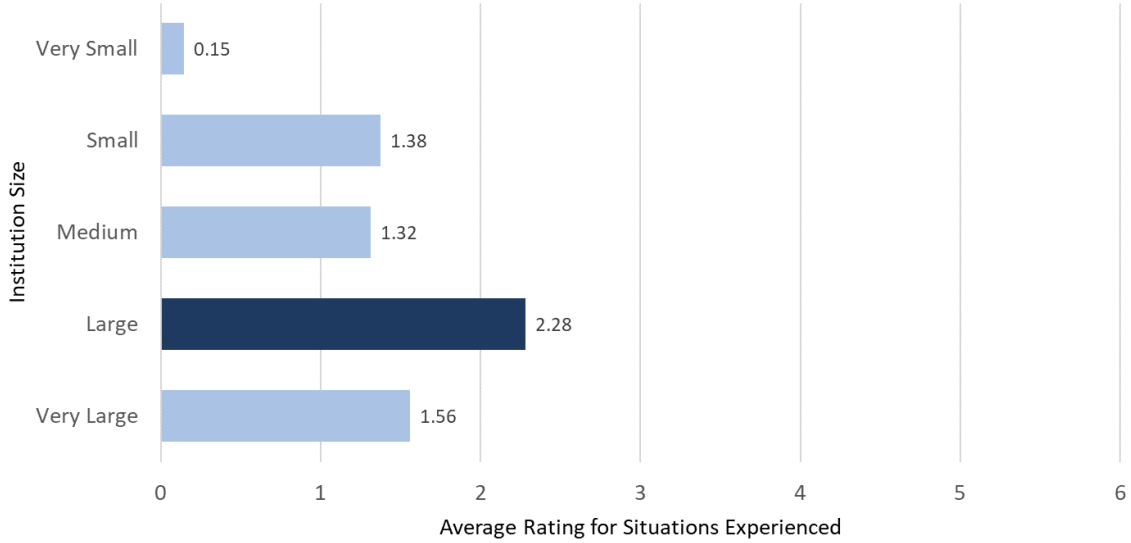
Average Number of ESAs by County Class



An effect in situations experienced by staff was found by the institutional characteristic of institution size (p = .004). Figure 5.14 shows that the highest mean for the average rating for situations experienced was for the large institution size. While a statistically significant difference exists, the significance of the results is questionable as there were only two responding institutions categorized as large.

Figure 5.14

Average Rating for Situations Experienced by Institution Size



Regarding respondents' characteristics, significant differences were found for enacted policy components and the staff experiences of the number of ESAs and policy helpfulness. Respondents' knowledge of the policy impacted the policy rating (p = .024). The 'Extremely Knowledgeable' response had the highest mean (M = 3.830), followed by 'Moderately Knowledgeable' (M = 3.408), and then 'Somewhat Knowledgeable' (M = 2.899). The practical significance of this finding might be that the more familiar one is with the policy, the stronger the person rates the policy.

In regard to staff experiences, the respondent characteristic of frequency of referencing the policy was significant for the number of ESAs on campus (p = 000). Respondents who reference the ESA policy one to two times a week had the highest average number of ESAs on campus (M = 26.43) followed by those who reference the policy one to two times a month (M = 7.18). This finding could indicate that the more

ESAs there are on campus, the more frequently staff find themselves referencing the ESA policy.

The respondent's characteristic of knowledge of the policy also impacted the staff experience of policy helpfulness (p = .025). Again, the 'Extremely Knowledgeable' response had the highest mean (M = 3.746), followed by 'Moderately Knowledgeable' (M = 3.250). The practical significance of this finding might be that the more familiar one is with the policy, the more helpful the policy is in responding to situations.

Recommendations for Practice

The results of this study demonstrate three benefits of campuses having a strong ESA policy: 1) staff concerns of a complaint being filed with the Office for Civil Rights or similar state or federal agency decreases, 2) the helpfulness of the policy to staff increases, and 3) a good policy helps staff to appropriately respond to situations. Therefore, the first recommendation for practice is for campuses to review their ESA policy to determine if there are areas where the policy could be strengthened. When reviewing the ESA policy, campuses should ensure the policy is tailored to their campus characteristics. A second recommendation for practice is the importance of staff familiarity with the ESA policy. The survey results demonstrate that as the staff's knowledge of the policy increases, the policy helpfulness also increases. Additionally, the more ESAs campuses have, the more the staff may need to reference the ESA policy.

Limitations of Study

While survey invitations were emailed to all campuses in Pennsylvania identified as having campus housing, the survey results may not fully represent the population as not all campuses responded (Linder et al., 2017). An additional limitation is that the

survey was a self-report of the policy components and staff experiences. As such, there is a possibility that respondents indicated their policy contained a particular component when it did not (Linder et al., 2017), or vice versa, which could have altered the results of the study. Finally, the enacted policy may not be followed which could impact staff experiences (CDC, n.d.d), thus altering the results of the study.

Recommendations for Future Research

Even though the survey used for the research was reviewed by an expert panel and pilot tested, the survey questions need further review and enhancement. The desire was to ask specific policy and staff experience questions as well as a couple of questions that would capture the overall strength of the policy and staff experiences. As the specific questions are grounded in the current literature, they are not as much of a concern as the overall questions. The overall questions about the strength of the policy and staff experiences need further examination as they may not be the right questions to ask. For example, is asking respondents to rate the campus's ESA policy on a scale of very poor to excellent the right question to get at the strength of the campus's ESA policy? Focusing on staff experiences, are the following three questions the right ones to generalize staff experiences: how helpful the policy is in responding to questions, staff concerns about complaints, and the amount of time spent on ESA accommodations? Further honing of these overall questions would strengthen the survey.

The research questions broadly examined enacted ESA policies and resulting staff experiences by merging responses to multiple questions thereby generating a single value. Future research could avoid this merging and have a narrower focus to examine specific enacted policy components and resulting staff experiences. For example, these

results demonstrated that the staff experiences with the largest averages were students inviting others to visit with their ESA, ESAs taken where they are not allowed, and submitted documentation being from a paid Internet site. One could look specifically at these resulting experiences to see what relationship there is between them and enacted policy components. Or conversely, one could examine the policy components that the fewest number of respondents indicated were included in policies to see if there is a relationship between those policy components and resulting staff experiences. Possible policy components to examine are having a pro/con list, an FAQ for staff and/or students, and the student responsibilities of not leaving the ESA in the care of someone else or leaving the animal alone overnight.

Conclusion

Stress is one variable that explains why students are not retained to graduation in higher education (Johnson et al., 2014). In addition, students are reporting decreasing emotional health (Higher Education Research Institute, 2011). This is one explanation why the number of requests for an ESA on campus has been increasing (Bauer-Wolf, 2019; Clark, 2017) since ESAs can support a student's emotional health (Brennan & Nguyen, 2014). The survey results support Clark's (2017) and Bauer-Wolf's (2019) statements that the number of ESAs on campuses has been increasing. In response to this increase as well as litigation and clarifications of regulations, campuses have enacted ESA policies as demonstrated by 97.4% of the responding campuses reporting they have an ESA policy.

A strong ESA policy is associated with staff being less concerned with a complaint being filed with the Office for Civil Rights or similar state or federal agency

and supports staff responding to situations related to ESAs. While no one policy components contributed to staff experiences more than another and no institutional characteristics had practical significance regarding enacted policy components or resulting staff experiences, respondents' characteristics did. The results demonstrate that as the staff's knowledge of the policy increases, the policy helpfulness also increases. Additionally, one's self-rated knowledge of the ESA policy affected the overall policy rating. Future research is needed to more fully understand the possible relationship between enacted ESA policy and staff experiences.

References

ADA National Network. (n.d.a). *Service animals* [Fact Sheet]. https://adata.org/factsheet/service-animals

ADA National Network. (n.d.b). What is considered an "undue hardship" for a reasonable accommodation? https://adata.org/faq/what-considered-undue-hardship-reasonable-accommodation

Adamle, K., Riley, T., & Carlson, T. (2009). Evaluating college student interest in pet therapy. *Journal of American College Health, 57*(5), 545-548.

Adams, A. C. Sharkin, B. S., & Bottinelli, J. J. (2017). The role of pets in the lives of college students: Implications for college counselors. *Journal of College Student Psychotherapy, 31*(4), 306–324. https://doi.org/10.1080/87568225.2017.1299601

Alejandro v. Palm Beach State College, 843 F. Supp. 2d 1263 (S.D. Fla., 2011). http://www.bazelon.org/alejandro-v-palm-beach-state-college/

Allen, K., Blascovich, J., & Mendes, W. B. (2002). Cardiovascular reactivity in the presence of pets, friends, and spouses: The truth about cats and dogs. *Psychosomatic Medicine, 64*(5), 727–739. https://doi.org/10.1097/01.PSY.0000024236.11538.41

American Association for Public Opinion Research. (2016). Standard definitions: Final dispositions of case codes and outcome rates for surveys. https://www.aapor.org/AAPOR_Main/media/publications/Standard-Definitions20169theditionfinal.pdf

American College Health Association. (2011). *American College Health Association National college health assessment II: Spring 2011 reference group data report*.

https://www.acha.org/documents/ncha/ACHA-NCHA-II_ReferenceGroup_DataReport_Spring2011.pdf

American College Health Association. (2018). *American College Health Association National college health assessment: Reference group data report spring 2018*. https://www.acha.org/documents/ncha/NCHA-II_Spring_2018_Reference_Group_Data_Report.pdf

American Pet Products Association. (n.d.) *Pet industry Market size & ownership statistics*. http://www.americanpetproducts.org/press_industrytrends.asp

American Veterinary Medical Association. (n.d.) *Animal-assisted interventions: Definitions*. https://www.avma.org/KB/Policies/Pages/Animal-Assisted-Interventions-Definitions.aspx

Arhant-Sudhir, K., Arhant-Sudhir, R., & Sudhir, K. (2011). Pet ownership and cardiovascular risk reduction: Supporting evidence, conflicting data and underlying mechanisms. *Clinical & Experimental Pharmacology & Physiology, 38*(11), 734–738. https://doi.org/10.1111/j.1440-1681.2011.05583.x

Barker, S. B., Barker, R. T., McCain, N. L., & Schubert, C. M. (2016). A randomized cross-over exploratory study of the effect of visiting therapy dogs on college student stress before final exams. *Anthrozoös, 29*(1), 35–46. https://doi.org/10.1080/08927936.2015.1069988

Barker, S. B., Barker, R. T., McCain, N. L., & Schubert, C. M. (2017). The effect of a canine-assisted activity on college student perceptions of family supports and current stressors. *Anthrozoos, 30*(4), 595–606. https://doi.org/10.1080/08927936.2017.1370227

Bauer-Wolf, J. Colleges see rise in popularity for emotional support animals. *Inside Higher Ed*. https://www.insidehighered.com/news/2019/05/21/colleges-see-rise-popularity-emotional-support-animals

Binfet, J. T. (2017). The effects of group-administered canine therapy on university students' wellbeing: A randomized controlled trial. *Anthrozoos, 30*(3), 397–414. https://doi.org/10.1080/08927936.2017.1335097

Binfet, J. & Passmore, H. (2016). Hounds and Homesickness: The Effects of an Animal-assisted Therapeutic Intervention for First-Year University Students. *Anthrozoös, 29*(3), 441-454. https://doi.org/10.1080/08927936.2016.1181364

Blue Cross Blue Shield. (2019, April 24). *The health of Millennials*. https://www.bcbs.com/the-health-of-america/reports/the-health-of-millennials

Bolin, S. E. (1987). The effects of companion animals during conjugal bereavement. *Anthrozoös, 1*(1), 26–35. https://doi.org/10.2752/089279388787058759

Brennan, J., & Nguyen, V. (2014). *Service animals and emotional support animals: Where are they allowed and under what conditions?* ADA National Network. https://adata.org/publication/service-animals-booklet

Brewer, G. (2001 March 19). *Snakes top list of Americans' fears*. GALLUP News Service. http://news.gallup.com/poll/1891/snakes-top-list-americans-fears.aspx

Brodersen, L. D. (2017). Interventions for test anxiety in undergraduate nursing students: An integrative review. *Nursing Education Perspectives, 38*(3), 131–137. https://doi.org/10.1097/01.NEP.0000000000000142

Browne, R. H. (1995). On the use of a pilot sample for sample size determination. *Statistics in Medicine, 14*(17), 1933–1940.

Brownson RC, Chriqui JF, & Stamatakis KA. (2009). Understanding evidence-based public health policy. *American Journal of Public Health, 99*(9), 1576–1583.

Brulliard, K. (2017, July 8). Everybody loves therapy animals. But there's no proof they help. *The Washington Post*. Toronto Star (Canada).

Brydges, C. R. (2019). Effect Size Guidelines, Sample Size Calculations, and Statistical Power in Gerontology. Innovation in Aging, 3(4), igz036, https://doi.org/10.1093/geroni/igz036

Caring Hearts Pet Therapy. (2015 April 11). *Caring Hearts Pet Therapy* [Brochure]. http://www.caringheartspettherapy.org/index.shtml

Centers for Disease Control and Prevention. (n.d.a). *Brief 1: Overview of policy evaluation*. https://www.cdc.gov/injury/pdfs/policy/Brief%201-a.pdf

Centers for Disease Control and Prevention. (n.d.b). Brief 3: Evaluating policy Content. https://www.cdc.gov/injury/pdfs/policy/Brief%203-a.pdf

Centers for Disease Control and Prevention. (n.d.c). Brief 4: Evaluating policy implementation. https://www.cdc.gov/injury/pdfs/policy/Brief%204-a.pdf

Centers for Disease Control and Prevention. (n.d.d). Brief 5: Evaluating policy impact. https://www.cdc.gov/injury/pdfs/policy/Brief%205-a.pdf

Centers for Disease Control and Prevention. (2017a, May 15). *A Framework for Program Evaluation*. https://www.cdc.gov/eval/framework/index.htm

Centers for Disease Control and Prevention. (2017b, September 15). *Allergies: Gateway to health communication & social marketing practice*. https://www.cdc.gov/healthcommunication/ToolsTemplates/EntertainmentEd/Tips/Allergies.html

Centers for Disease Control and Prevention. (2018). *Table 4. Life expectancy at birth, at age 65, and at age 75, by sex, race, and Hispanic origin: United States, selected years 1900–2017.* https://www.cdc.gov/nchs/hus/contents2018.htm?search=Life_expectancy

Chandler, C. K. (2019). Is there an epidemic of emotional support animals? In a rush to provide documentation for the growing numbers of people desiring emotional support animals, mental health providers could be putting others at risk. *Counseling Today, 61*(8), 52–56.

Chapell, M. S., Blanding, Z. B., Silverstein, M. E., Takahashi, M., Newman, B., Gubi, A., & McCann, N. (2005). Test Anxiety and Academic Performance in Undergraduate and Graduate Students. *Journal of Educational Psychology, 97*(2), 268–274. https://doi.org/10.1037/0022-0663.97.2.268

Charnetski C.J., Riggers S., & Brennan F.X. (2004). Effect of petting a dog on immune system function. *Psychological Reports, 95*(3 Pt 2), 1087–1091.

Clark, M. D. (2017, April 14). Miami U. mirrors rising trend of students using support animals. *Journal-News, The (Hamilton, OH)*. https://www.journal-news.com/news/local-education/miami-mirrors-rising-trend-students-using-support-animals/7b0ZnUkalL18QCjsG0XKRJ/

Clutton-Brock, J. (1995). Origins of the dog: Domestication and early history. In J. Serpell (Ed.), *The domestic dog: Its evolution, behavior and interactions with people*. (pp. 7-20). Cambridge University Press.

Columbia University Mailman School of Public Health. (n.d). *Age-Period-Cohort Analysis*. https://www.mailman.columbia.edu/research/population-health-methods/age-period-cohort-analysis

Connelly, L. M. (2008). Pilot studies. *Medsurg Nursing: Official Journal of the Academy of Medical-Surgical Nurses, 17*(6), 411–412.

County Commissioners Association of Pennsylvania. (n.d.). *Counties by Class*. https://www.pacounties.org/PAsCounties/Pages/Counties-by-Class.aspx

Creswell, J. W. (2014). *Research design: Qualitative, quantitative, and mixed methods approaches* (4th edition). Sage Publications.

Cronbach, L. J., & Shavelson, R. J. (2004). My Current Thoughts on Coefficient Alpha and Successor Procedures. *Educational & Psychological Measurement, 64*(3), 391–418.

Crossman, M. K., Kazdin, A. E., & Knudson, K. (2015). Brief unstructured interaction with a dog reduces distress. *Anthrozoös, 28*(4), 649–659. https://doi.org/10.1080/08927936.2015.1070008

Crump, C., & Derting, T. L. (2015). Effects of pet therapy on the psychological and physiological stress levels of first-year female undergraduates. *North American Journal of Psychology, 17*(3), 575–590.

Dayton, J. (2015). *Higher Education Law: Principles, Policies, and Practice*. Wisdom Builders Press. ISBN – 13: 978-1506129211

Delgado, C., Toukonen, M., & Wheeler, C. (2017). Effect of canine play interventions as a stress reduction strategy in college students. *Nurse Educator*. https://doi.org/10.1097/NNE.0000000000000451

Dell, C. A., Chalmers, D., Gillett, J., Rohr, B., Nickel, C., Campbell, L., Hanoski, R., Haugerud, J., Husband, A., Stephenson, C., & Brydges, M. (2015). PAWSing student stress: A pilot evaluation study of the St. John Ambulance Therapy Dog program on three university campuses in Canada. *Canadian Journal of Counselling and Psychotherapy, 49*(4), 332–359.

Dillman, D. A., Smyth, J. D., & Christian, L. M. (2014). *Internet, phone, mail, and mixed mode surveys: The tailored design method* (4th edition). Wiley.

FHA permits therapy pets in residence halls. (2013). *Student Affairs Today, 16*(7), 9.

Field, K. (2006, October 13). These Student Requests Are a Different Animal. *Chronicle of Higher Education*, pp. A30–A31.

Fiocco, A. J., & Hunse, A. M. (2017). The buffer effect of therapy dog exposure on stress reactivity in undergraduate students. *International Journal of Environmental Research and Public Health, 14*(7). https://doi.org/10.3390/ijerph14070707

Friedmann, E., Katcher, A. H., Lynch, J. J., & Thomas, S. A. (1980). Animal companions and one-year survival of patients after discharge from a coronary care unit. *Public Health Reports (Washington, D.C.: 1974), 95*(4), 307–312.

Friedmann, E., Son, H., & Saleem, M. (2015). The animal-human bond: Health and wellness. In A. H. Fine (Ed.), *Handbook on animal-assisted therapy: Foundations and guidelines for animal-assisted interventions* (4th edition). (pp. 333-337). Academic Press.

Friedman, E., & Thomas, S. A. (1985). Health benefits of pets for families. *Marriage & Family Review, 8*(3–4), 191–203. https://doi.org/10.1300/J002v08n03_14

Friedmann, E., & Thomas, S. A. (1995). Pet ownership, social support, and one-year survival after acute myocardial infarction in the Cardiac Arrhythmia Suppression Trial (CAST). *The American Journal of Cardiology, 76*(17), 1213–1217.

Garrity, T. F., Stallones, L., Marx, M. B., & Johnson, T. P. (1989). Pet ownership and attachment as supportive factors in the health of the elderly. *Anthrozoös, 3*(1), 35–44. https://doi.org/10.2752/089279390787057829

Gilbey, A., & Tani, K. (2015). Companion animals and loneliness: A systematic review of quantitative studies. *Anthrozoos, 28*(2), 181–197. https://doi.org/10.2752/089279315X14219211661615

Gose, B. (2016, September 18). As standards change, disability officers race to keep up. *Chronicle of Higher Education*, B7–B7.

Green, A. (2019, January 10). Deaf student's lawsuit over service dog spurs Portland State University's $160,000 settlement. *The Oregonian*. https://www.oregonlive.com/portland/2014/02/deaf_students_lawsuit_over_ser.html

Grier, K. C. (2006). *Pets in America: A history*. Harcourt.

Grieve, K. A. (2014 January 8). Reasonable accommodations? The debate over service and emotional support animals on college campuses. *National Association of Student Personnel Administrators*. https://www.naspa.org/rpi/posts/reasonable-accommodations-the-debate-over-service-and-emotional-support-ani

Harshman, M. (2016, March 7). Ruxin, the therapy pig, more than a pal to help with pain. *Columbian, The (Vancouver, WA)*.

Hart, L.A. (1995). Dogs as human companions: A review of the relationship. In J. Serpell (Ed.), *The domestic dog: Its evolution, behavior and interactions with people*. (pp. 161-178). Cambridge University Press.

Helms, J. E., Henze, K. T., Sass, T. L., & Mifsud, V. A. (2006). Treating Cronbach's alpha reliability coefficients as data in counseling research. *Counseling Psychologist, 34*(5), 630–660.

Herring, M. Y. (2017). Little Red Herrings—Arf! A Bark Really Worse than Its Bite. *Against the Grain, 29*(1), 58–58.

Higher Education Research Institute. (2011). The American freshman: National norms fall 2010. *Research brief*. http://www.heri.ucla.edu/PDFs/pubs/briefs/HERI_ResearchBrief_Norms2010.pdf

Hoover, E. (2003, September 12). Animal housing: The secret life of students' pets is not always a walk in the park. *The Chronicle of Higher Education, 50*(3), A31-A33.

Hope, J. (2016). Review consent decree for guidance on assistance animals on campus. *Student Affairs Today, 18*(11), 4–4. https://doi.org/10.1002/say.30163

Hope, J. (2017). Know how to respond to challenges presented by animals on campus. *Campus Legal Advisor, 18*(4), 1–6. https://doi.org/10.1002/cala.30682

House, L. A., Neal, C., & Backels, K. (2018). A Doggone Way to reduce stress: An animal assisted intervention with college students. *College Student Journal, 52*(2), 199–204.

Howell, D.C. (2017). *Fundamental statistics for the behavioral sciences* (9th edition). Cengage Learning.

Huang, J., Nigatu, Y. T., Smail-Crevier, R., Zhang, X., & Wang, J. (2018). Interventions for common mental health problems among university and college students: A systematic review and meta-analysis of randomized controlled trials. *Journal of Psychiatric Research, 107*, 1–10.

HUD v. Riverbay, ALJ 02-93-0320-1 (1994). https://www.hud.gov/sites/documents/HUD1994-09-08.PDF

Hudd, S. S., Dumlao, J., Erdmann-Sager, D., Murray, D., Phan, E., Soukas, N., & Yokozuka, N. (2000). Stress at college: Effects on health habits, health status and self-esteem. *College Student Journal, 34*(2), 217.

Huss, R. J. (2012). Canines on campus: companion animals at postsecondary educational institutions. *Missouri Law Review, 77*(2), 417–479.

Hyde, K. R., Kurdek, L., & Larson, P. C. (1983). Relationships between pet ownership and self-esteem, social sensitivity, and interpersonal trust. *Psychological Reports, 52*(1), 110–110. https://doi.org/10.2466/pr0.1983.52.1.110

Immaculata University. (n.d.). *Research ethics review board (RERB).* https://www.immaculata.edu/academics/research-ethics-review-board-rerb/

International Association of Human-Animal Interaction Organizations. (2014). *The IAHAIO definitions for animal assisted intervention and guidelines for wellness of animals involved*. http://iahaio.org/best-practice/white-paper-on-animal-assisted-interventions/

Jarrow, J. E. (2017). *Meet Jane E. Jarrow, Ph.D.* http://www.daisclasses.com/files/AboutJEJ_2017.pdf

Johnson, D. R., Wasserman, T. H., Yildirim, N., & Yonai, B. A. (2014). Examining the Effects of Stress and Campus Climate on the Persistence of Students of Color and White Students: An Application of Bean and Eaton's Psychological Model of Retention. *Research in Higher Education, 55*(1), 75–100.

Julious, S. A. (2005). Sample size of 12 per group rule of thumb for a pilot study. *Pharmaceutical Statistics, 4*, 287-291.

Kidder, D. P., & Chapel, T. J. (2018). CDC's Program Evaluation Journey: 1999 to Present. *Public Health Reports, 133*(4), 356–359.

King, C. (2017). *Experiences Arranging Animal-Assisted Activities on College Campuses*. Unpublished manuscript, Immaculata University.

Kitzrow, M. A. (2009). The mental health needs of today's college students: Challenges and recommendations. *NASPA Journal (Online), 46*(4), 646–660.

Kogan, L. R. 1, Schaefer, K., Erdman, P., & Schoenfeld-Tacher, R. (2016). University Counseling Centers' Perceptions and Experiences Pertaining to Emotional Support Animals. *Journal of College Student Psychotherapy, 30*(4), 268–283. https://doi.org/10.1080/87568225.2016.1219612

Levine, D. (2018, October 5). What's Behind the Rise in Support Animals on College Campuses? *U.S. News & World Report*. https://health.usnews.com/health-care/patient-advice/articles/2018-10-05/whats-behind-the-rise-in-support-animals-on-college-campuses

Linder, D. E., Siebens, H. C., Mueller, M. K., Gibbs, D. M., & Freeman, L. M. (2017). Animal-assisted interventions: A national survey of health and safety policies in

hospitals, eldercare facilities, and therapy animal organizations. *American Journal of Infection Control, 45*(8), 883–887. https://doi.org/10.1016/j.ajic.2017.04.287

Lu, L. (1994). University transition: Major and minor stressors, personality characteristics and mental health. *Psychological Medicine, 24*, 81-87.

Martin, F., & Farnum, J. (2002). Animal-assisted therapy for children with pervasive developmental disorders. *Western Journal of Nursing Research, 24*(6), 657–670.

Masinter, M. R. 1, 2. (2013). HUD notice on emotional support assistance animals has important implications for institutions. *Disability Compliance for Higher Education, 18*(12), 3–3. https://doi.org/10.1002/dhe

Masinter, M. R. (2015). Justice Department settlement gives new power to campuses over emotional support animals. *Disability Compliance for Higher Education, 21*(5), 6–7. https://doi.org/10.1002/dhe.30126

Masinter, M. R. (2016). Create a process to handle students' requests for emotional support assistance animals in campus housing. *Campus Legal Advisor, 17*(4), 4–4. https://doi.org/10.1002/cala.30456

Masinter, M. (2017). Evaluate requests for exotic animals, multiple animals as ESAs. *Disability Compliance for Higher Education, 23*(3), 1–3. https://doi.org/10.1002/dhe.30346

Masinter, M. R. (2018). When accommodations conflict, documentation is important. *Disability Compliance for Higher Education, 23*(7), 1–3. https://doi.org/10.1002/dhe.30387

Masinter, M. R. (2019). Reducing ESA and service animal fraud. *Disability Compliance for Higher Education, 25*(5), 1–3. https://doi.org/10.1002/dhe.30750

McClellan, G. S., & Stringer, J. (Eds.). (2016). *The handbook of student affairs administration* (4th edition). Jossey-Bass.

McConnell, A. R., Brown, C. M., Shoda, T. M., Stayton, L. E., & Martin, C. E. (2011). Friends with benefits: On the positive consequences of pet ownership. *Journal of Personality and Social Psychology, 101*(6), 1239–1252. https://doi.org/10.1037/a0024506

Minitab 18 Support. (n.d.). Enter your data for item analysis. Minitab, LLC. https://support.minitab.com/en-us/minitab/18/help-and-how-to/modeling-statistics/multivariate/how-to/item-analysis/perform-the-analysis/enter-your-data/

Mintz, S. (2019, March 18). Are Colleges Ready for Generation Z? *Inside Higher Ed*. https://www.insidehighered.com/blogs/higher-ed-gamma/are-colleges-ready-generation-z

Mosby's Medical, Nursing, & Allied Health Dictionary. (1994). Immunoglobulin A. In *Mosby's Medical, Nursing, & Allied Health Dictionary* (4th edition). Mosby-Year Book, Inc.

Muckle, J., & Lasikiewicz, N. (2017). An exploration of the benefits of animal-assisted activities in undergraduate students in Singapore. *Asian Journal of Social Psychology, 20*(2), 75–84. https://doi.org/10.1111/ajsp.12166

National Association of College and University Attorneys. (2011, April 14). Accommodating service and assistance animals on campus: Making heads or tails of the ADA, FHA, and Section 504. *NACUA Notes, 9*(8). https://ogc.byu.edu/NACUANotes/2011%20April%2014%20NACUANotes.pdf

National Institute of Mental Health. (2016). *Generalized anxiety disorder: When worry gets out of control* (Publication No. QF 16-4677). https://www.nimh.nih.gov/health/publications/generalized-anxiety-disorder-gad/generalized-anxiety-disorder_124169.pdf

National Service Animal Registry. (n.d.). *National Service Animal Registry*. https://www.nsarco.com/

Nova, A. (2018 June 20). Here are the colleges that will allow you to bring furry friends. *CNBC*. https://www.cnbc.com/2018/06/20/here-are-the-colleges-that-will-let-you-bring-your-dog.html

O'Brien, T. (2019). Understand how access rights apply to service animals at athletics events. *College Athletics & the Law, 15*(12), 1–3. https://doi.org/10.1002/catl.30575

Ownby, D., & Johnson, C. C. (2016). Recent understandings of pet allergies. *F1000research, 5*. https://doi:10.12688/f1000research.7044.1

Pew Research Center. (2018, March 1). *The generation gap in American politics*. http://assets.pewresearch.org/wp-content/uploads/sites/5/2018/03/01122435/03-01-18-Generations-release.pdf

Phillips, M. (2016). Service and Emotional Support Animals on Campus: The Relevance and Controversy. *Research & Teaching in Developmental Education, 33*(1), 96–99.

Raue, K. & Lewis, L. (2011). *Students with disabilities at degree-granting postsecondary institutions* (NCES 2011-018). Us Department of Education, National Center for

Education Statistics. Washington, DC: US Government Printing Office. https://nces.ed.gov/pubs2011/2011018.pdf

Review rulings involving service, emotional support animals. (2019). *Campus Legal Advisor, 19*(6), 16–16. https://doi.org/10.1002/cala.30970

Rothstein, L. (2018). A primer on disability discrimination in higher education. *Laws, 7*(3), 1-33.

Rust, M., & Wise, M. (2017). The Importance of Establishing Assistance Animal Policies for Your Library. *PNLA Quarterly, 81*(2), 37–53.

Salminen, E., & Gregory, D. E. (2018). Animal housing: Emotional support animals on campuses. *Journal of College and University Student Housing, 44*(3), 47–61.

Sanford, M. D. (2015). *Campus tails: An on-campus therapy-dog pilot program and feasibility study* (Publication No. 2015-99240-185) [Doctoral Dissertation, Antioch University – New England]. ProQuest Information & Learning.

Schmitt, N. (1996). Uses and abuses of coefficient alpha. *Psychological Assessment, 8*(4), 350–353.

Schoenfeld-Tacher, R., Hellyer, P., Cheung, L., & Kogan, L. (2017). Public Perceptions of Service Dogs, Emotional Support Dogs, and Therapy Dogs. *International Journal of Environmental Research and Public Health, 14*(6). https://doi.org/10.3390/ijerph14060642

Section 504 of the Rehabilitation Act of 1973. 29 U.S.C. § 704(a) (n.d.). https://www.dol.gov/oasam/regs/statutes/sec504.htm

Serpell, J. (1991). Beneficial effects of pet ownership on some aspects of human health and behaviour. *Journal of the Royal Society of Medicine, 84*(12), 717–720.

Serpell, J. A. (2003). Anthropomorphism and Anthropomorphic Selection—Beyond the "Cute Response." *Society & Animals, 11*(1), 83–100. https://doi.org/10.1163/156853003321618864

Shackelford, A. L. (2013). Prepare to address increased demand for therapy animals in campus housing. *Campus Legal Advisor, 13*(12), 3–3. https://doi.org/10.1002/cala

Shearer, A., Hunt, M., Chowdhury, M., & Nicol, L. (2016). Effects of a brief mindfulness meditation intervention on student stress and heart rate variability. *International Journal of Stress Management, 23*(2), 232–254. https://doi.org/10.1037/a0039814

State of Connecticut, Department of Social Services. (n.d.) *Bureau of Rehabilitation Services Manual*. https://www.vba.va.gov/bln/vre/epss/vrc_gateway/pdfs/serious_limits.pdf

Stewart, L., Dispenza, F., Parker, L., Chang, C. & Cunnien, T. (2014). A pilot study assessing the effectiveness of an animal-assisted outreach program. *Journal of Creativity in Mental Health, 9*(3), 332-345. https://doi.org/10.1080/15401383.2014.892862

Stockman, F. (2019, June 18). People Are Taking Emotional Support Animals Everywhere. States Are Cracking Down. *The New York Times*. https://www.nytimes.com/2019/06/18/us/emotional-support-animal.html

Stupnisky, R. H., Perry, R. P., Renaud, R. D., & Hladkyj, S. (2013). Looking beyond grades: Comparing self-esteem and perceived academic control as predictors of first-year college students' well-being. *Learning and Individual Differences, 23*, 151–157. https://doi.org/10.1016/j.lindif.2012.07.008

Sutton, H. (2016). Kent State settles emotional support animal lawsuit. *Disability Compliance for Higher Education, 21*(10), 9–9. https://doi.org/10.1002/dhe.30180

Tavakol, M., & Dennick, R. (2011). Making sense of Cronbach's alpha. *International Journal of Medical Education, 2*, 53–55. https://doi.org/10.5116/ijme.4dfb.8dfd

Taylor, J. S. (2016). Colleges see an uptick in requests for emotional support animals on campus. *ABA Journal*, 7.

Tedeschi, P., Pearson, J., Bayly, D., & Fine, A. (2015). On call 24/7 – The emerging roles of service and support animals. In A. H. Fine (Ed.), *Handbook on animal-assisted therapy: Foundations and guidelines for animal-assisted interventions* (4th edition). (pp. 321-332). Academic Press.

Twenge, J. M., Cooper, A. B., Joiner, T. E., Duffy, M. E., & Binau, S. G. (2019). Age, period, and cohort trends in mood disorder indicators and suicide-related outcomes in a nationally representative dataset, 2005–2017. *Journal of Abnormal Psychology, 128*(3), 185–199.

U.S. Census Bureau. (n.d.). *Quick facts Delaware; New York; New Jersey; Maryland; Ohio; Pennsylvania* [Data set]. Retrieved June 14, 2020 from https://www.census.gov/quickfacts/fact/table/DE,NY,NJ,MD,OH,PA/BZA010217

U.S. Department of Education, National Center for Education Statistics. (2012). Table 269. *Digest of Education Statistics, 2012*. https://nces.ed.gov/programs/digest/d12/tables/dt12_269.asp

U.S. Department of Education, National Center for Education Statistics. (2019). Table 311.10. *Digest of Education Statistics, 2017* (2018-070), Chapter 3. https://nces.ed.gov/programs/digest/d17/tables/dt17_311.10.asp?referrer=report

U.S. Department of Education, National Center for Education Statistics, Integrated Postsecondary Education Data System (IPEDS). (n.d.). *College navigator*. Retrieved June 14, 2020 from https://nces.ed.gov/collegenavigator/?s=OH&hs=1

U.S. Department of Education, Office of Civil Rights. (1998, September). *Auxiliary Aids and Services for Postsecondary Students with Disabilities.* https://www2.ed.gov/about/offices/list/ocr/docs/auxaids.html

U.S. Department of Housing and Urban Development. (n.d.a). *Assistance animals*. https://www.hud.gov/program_offices/fair_housing_equal_opp/assistance_animals

U.S. Department of Housing and Urban Development. (n.d.b). *Fair Housing Laws and Presidential Executive Orders*. https://www.hud.gov/program_offices/fair_housing_equal_opp/disability_overview

U.S. Department of Housing and Urban Development. (2013 April 25). *Service animals and assistance animals for people with disabilities in housing and HUD-funded programs*. https://www.hud.gov/sites/documents/servanimals_ntcfheo2013-01.pdf

U.S. Department of Justice. (2011, July). *Service Animals*. https://www.ada.gov/service_animals_2010.htm

U.S. Department of Justice & U.S. Department of Housing and Urban Development. (2004, May 17). *Joint Statement of Housing and Urban Development and the*

Department of Justice: Reasonable accommodations under the Fair Housing Act. https://www.justice.gov/crt/us-department-housing-and-urban-development

U. S. Equal Employment Opportunity Commission. (n.d.). *The Americans with Disabilities Act of 1990*. https://www.eeoc.gov/eeoc/history/35th/1990s/ada.html

U.S.A. v. University of Nebraska at Kearny, et al., 40 F. Supp. 2d 974, 975 (D. Neb. 2013). https://www.animallaw.info/case/united-states-v-univ-neb-kearney

U.S.A. v. University of Nebraska at Kearny, et al., 4:11-CV-3209 Consent Decree (D. Neb. 2015). https://www.justice.gov/crt/case/united-states-v-university-nebraska-kearney-d-neb

Usry, J., Partington, S. W., & Partington, J. W. (2018). Using expert panels to examine the content validity and inter-rater reliability of the ABLLS-R. *Journal of Developmental & Physical Disabilities, 30*(1), 27–38.

Velzen v. Grand Valley State Univ., 902 F. Supp. 2d 1038 (W.D. Mich. 2012). https://www.animallaw.info/case/velzen-v-grand-valley-state-university

Von Bergen, C. W. (2015). Emotional support animals, and pets on campus. *Administrative Issues Journal: Connecting Education, Practice, and Research, 5*(1), 15-34.

Vormbrock JK, & Grossberg JM. (1988). Cardiovascular effects of human-pet dog interactions. *Journal of Behavioral Medicine, 11*(5), 509–517.

Walsh, F. (2009). Human-Animal Bonds I: The Relational Significance of Companion Animals. *Family Process, 48*(4), 462–480. https://doi.org/10.1111/j.1545-5300.2009.01296.x

Walsh, J. A. (2020). *Nursing Program Criteria and Nclex-Rn® First Time Pass Rates* (Publication No. 832) [Doctoral dissertation, Immaculata University]. Dissertations and Theses @ Immaculata University.

Yamamoto, M., & Hart, L. A. (2019). Providing guidance on psychiatric service dogs and emotional support animals. In L. Kogan & C. Blazina (Eds.), *Clinician's guide to treating companion animal issues: Addressing human-animal interaction*. (pp. 77–101). Elsevier Academic Press. https://doi.org/10.1016/B978-0-12-812962-3.00005-8

Yamamoto, M., Lopez, M. T., & Hart, L. A. (2015). Registrations of Assistance Dogs in California for Identification Tags: 1999–2012. *PLoS ONE, 10*(8), 1–20. https://doi.org/10.1371/journal.pone.0132820

Young, J. S. (2012). Pet therapy: Dogs de-stress students. *Journal of Christian Nursing, 29*(4), 217–221. https://doi.org/10.1097/CNJ.0b013e31826701a7

Zikmund, W G.., Babin, B. J., Car, J. C., & Griffin, M. (2013). *Business research methods*. Cengage Learning.

Appendix A

Research Ethics Review Board Approval

IMMACULATA UNIVERSITY RESEARCH ETHICS REVIEW BOARD
REQUEST FOR PROTOCOL REVIEW--REVIEWER'S COMMENTS FORM
(R1297)

Name of Researcher: Christy King

Project Title: Implementing Emotional Support Animal Policies

Reviewer's Comments:

Your proposal is **Approved**. You may begin your research or collect your data.

PLEASE NOTE THAT THIS APPROVAL IS VALID FOR ONE YEAR **(365 days)** FROM DATE OF SIGNING.

Reviewer's Recommendations:

_____ Exempt	___X___ **Approve**
_____ Expedited	_____ Conditionally Approved
_____ Full Review	_____ Do Not Approve

Marcia Parris

Marcia Parris, Ed.D.,
Chair, Research Ethics Review Board

October 16, 2020
Date

Appendix B

Pilot Recruitment Email

Date: July 16, 2020

Subject: Dissertation Pilot Survey - Emotional Support Animal Policy

Dear (*insert name*),

My name is Christy King and I am a doctoral candidate in the Higher Education program at Immaculata University. I am researching the relationship between emotional support animal (ESA) policies campuses have implemented and related staff experiences and need your help. Your input and comments on the pilot survey will inform the final survey.

I am hopeful that you will decide to participate in this pilot survey. All you need to do is click on the survey link which is unique to you.

(*survey link*)

The pilot survey will ask questions about what is included in your institution's ESA policy and your experiences as a staff person implementing the policies. You may wish to review your campus's ESA policy prior to beginning the survey. The pilot survey also asks for your comments regarding the content and process of the survey. Should this web-based survey pose a problem, please contact me, and I will make arrangements to provide you another method of participation.

Your participation is voluntary and will take approximately 30 minutes of your time. You may decline to answer any questions. Further, you may decide to withdraw from this study at any time without any penalty by not submitting your response. There are minimal risks associated with participating in this study which may include fatigue from answering the questions. You can stop, reset, and restart the online survey.

All information you provide is considered confidential. All the data will be summarized and used to inform the final survey instrument. Data collected from this pilot survey will be accessed only by the researcher and the dissertation supervisor. All will be maintained on a password-protected computer database. As well, the data will be electronically archived after completion of the study and maintained for 5 years.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu, with any questions about this study.

Please complete the pilot survey by August 6, 2020.

Thank you for your assistance!

Christy King

Appendix C

Pilot Survey

Implementation of Emotional Support Animal Policies and Resulting Staff Experiences

This pilot survey is being conducted by myself, Christy King, as part of my dissertation research in the Higher Education program at Immaculata University under the supervision of Carolyn Dumaresq, Ed.D. I am conducting a pilot survey to collect data focusing on emotional support animal (ESA) policies campuses have implemented and related staff experiences.

As a person working in residence life or disability services, I am asking for your feedback about this new pilot survey about your campus's ESA policy and your related experiences. Results from this pilot survey will be used to inform and fine tune a final instrument. The final instrument will be used in my dissertation research to examine a possible relationship between campuses' ESA policies and the related staff experiences. The final instrument will be approved by the Immaculata University Research Ethics Review Board before data collection begins in Pennsylvania.

All information you provide will be confidential. All data will be summarized. The data collected from this pilot survey will be accessed only by the researcher and the dissertation supervisor. All data will be maintained in a password-protected computer database. As well, the data will be electronically archived after completion of the study and maintained for 5 years after the research has been completed.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study.

Thank you for participating in this pilot survey!

Christy King

Note: Please take note of the time as the last question will ask how many minutes it took you to complete the survey.

Consent

1. To participate in this survey, you must be 18 years of age or older.*

   ☐ I am 18 years of age or older and by completing this survey have voluntarily agreed to participate in this pilot study.

   (continue to question #2)

   ☐ I am less than 18 years old.

   (go to thank you page of survey)

Campus Policies

The focus for this section of the survey is about the campus's ESA policy.

General Policy Components

2. Are students allowed to have pets such as dogs and/or cats in the residence halls?

   ☐ Yes

   ☐ No

   (continue to next question)

3. Does the campus have any emotional support animal (ESA) policies?*

   ☐ Yes

   (continue to question #6)

   ☐ No

   (continue to question #4)

4. Please explain why you believe the campus does not have any emotional support animal policies.

   (continue to next question)

5. Does the campus plan on or in the process of creating an ESA policy?

   ☐ Unsure

   ☐ No

   ☐ Yes

   (go to thank you page of survey)

6. Rate your knowledge of the campus's ESA policy.*

Not at All Knowledgeable	Slightly Knowledgeable	Somewhat Knowledgeable	Moderately Knowledgeable	Extremely Knowledgeable
☐	☐	☐	☐	☐

(If "Not at All Knowledgeable" or "Slightly Knowledgeable" are selected, taken to thank you page of survey)

(otherwise, continue to next question)

7. How often do you reference the ESA policy for things such as review of an accommodation request, discussing a complaint with a student, dealing with a policy violation, etc.?

   ☐ Almost daily

   ☐ One to two times a week

   ☐ One to two times a month

(continue to next question)

8. For each statement, indicate whether each item is mentioned in the campus ESA policy.

Statement	**Unsure**	**No**	**Yes**
The ESA policy is a separate policy from other policies such as service animals.	☐	☐	☐
The policy defines an ESA.	☐	☐	☐
The policy defines a service animal.	☐	☐	☐
The policy defines a pet.	☐	☐	☐
The policy defines a therapy animal.	☐	☐	☐
Any student with an ESA is required to live in a particular residence hall(s)	☐	☐	☐
The policy outlines that training is available to faculty and staff (full time, part time, or student employees) about ESAs.	☐	☐	☐

(If "Yes" selected for last statement, go to question #9)

(If "No" or "Unsure" selected for last statement, go to question #10)

9. In the previous question, “Yes” was selected to the statement that training is available to faculty and staff. Please select the staff groups that may receive training. Select all that apply.

    - ☐ Academic Affairs
    - ☐ Campus Police/Public safety
    - ☐ Counseling Services
    - ☐ Disability Services
    - ☐ Faculty
    - ☐ Residence Life
    - ☐ Residence Life – student employees
    - ☐ Other – Write In _____

(continue to next question)

10. Indicate the offices/departments that participated in the development of the campus’s ESA policy. Select all that apply.

    - ☐ Academic Affairs
    - ☐ Campus Police/Public Safety
    - ☐ Counseling Services
    - ☐ Dean of Students
    - ☐ Disability Services
    - ☐ External Consultant
    - ☐ Legal Services
    - ☐ Residence life
    - ☐ Student Disciplinary Board/Honor Council
    - ☐ Other – Write In _____
    - ☐ None of these
    - ☐ I do not know.

(continue to next question)

11. For each statement, indicate if the item is available.

Statement	Unsure	No	Yes
A pro/con list is available to students interested in having an ESA on campus.	☐	☐	☐
There are frequently asked questions about ESAs available to **students**.	☐	☐	☐
There are frequently asked questions about ESAs available to **faculty and staff**.	☐	☐	☐

(continue to next question)

Animals

12. This question focuses on the animals allowed on campus as ESAs. For each statement, consider whether each item is mentioned in the campus ESA policy.

Statement	Unsure	No	Yes
The policy limits the type of animal that can be an ESA.	☐	☐	☐
Non-domesticated or exotic animals such as monkeys are prohibited as ESAs except for special exceptions.	☐	☐	☐
There is a weight size limit on the type of animal that can be an ESA except for special exceptions.	☐	☐	☐
There is a height limit on the type of animal that can be an ESA except for special exceptions.	☐	☐	☐
The animal must be house trained, as appropriate.	☐	☐	☐
The animal must be vaccinated according to state and local requirements.	☐	☐	☐
The animal must be licensed according to state and local requirements.	☐	☐	☐
The animal must be in good health.	☐	☐	☐
An alternate caregiver for the animal must be on file.	☐	☐	☐

(continue to next question)

Documentation

13. How many calendar days prior to the student's desire to have an ESA on campus does the policy suggest a student should submit documentation? ____

(continue to next question)

14. Within how many **calendar** days does the policy state the ESA request will be reviewed? ____

(continue to next question)

15. Does the campus ESA policy require a statement or letter from a licensed physical health or mental health care practitioner?

☐ Unsure

☐ No

(continue to next question #19)

☐ Yes

(continue to question #16)

16. Does the campus provide a specific list of requirements or form for a practitioner to complete?

☐ Unsure

☐ No

☐ Yes

(continue to next question)

17. This question focuses on the documentation from a licensed physical health or mental health care practitioner. The documentation could be in a letter or on a campus specific form. For each statement, consider whether each item is included in the campus ESA policy.

Statement	Unsure	No	Yes
The license number of the practitioner.	☐	☐	☐
Whether the student is under the care of the practitioner.	☐	☐	☐
Whether the practitioner "prescribed" the ESA for the student.	☐	☐	☐
A statement that the student has a disability.	☐	☐	☐
The specific disability diagnosis(es) for the student.	☐	☐	☐
A description of the relationship between the student's disability and how the ESA helps the student.	☐	☐	☐
The length of time the practitioner has been working with the student.	☐	☐	☐

Statement	Unsure	No	Yes
The student should request the documentation from a practitioner he or she has been working with for a minimum amount of time.	☐	☐	☐

(If "Yes" selected for last statement, go to question #15)

(If "No" selected for last statement, go to question #16)

18. What is the minimum length of time, in months, stated in the policy that the student should be under the provider's care prior to the request? ____

(continue to next question)

19. This question focuses on what the policy states about the information that a **student** completes or submits. For each statement, consider whether each item is included in the campus ESA policy.

Statement	Unsure	No	Yes
A statement that he or she has a disability.	☐	☐	☐
The specific disability diagnosis(es) that he or she has.	☐	☐	☐
A description of the relationship between the disability and how the ESA helps him/her.	☐	☐	☐
The student is required to submit a new letter for the same ESA on an annual basis.	☐	☐	☐
Submission of veterinary records for the ESA as appropriate.	☐	☐	☐

(continue to next question)

Student Responsibilities

20. This question focuses on the student responsibilities included in the campus's ESA policy or related guidance for students. For each statement, consider whether each item is included in the campus ESA policy or other guidance.

Statement	Unsure	No	Yes
Once an ESA is approved, the student must sign a contract to have the ESA on campus.	☐	☐	☐
Where the student is permitted to have the ESA on campus.	☐	☐	☐

Statement	Unsure	No	Yes
A student with an ESA must consent to limited sharing of information so that his or her roommate(s) can be notified prior to the ESA being in the room.	☐	☐	☐
The animal is NOT allowed to be left in the care of someone other than the student whose ESA it is such as for toileting.	☐	☐	☐
The animal is NOT allowed to be left alone overnight.	☐	☐	☐
The student must provide emergency contact information of a person off campus who can care for the ESA if the student is incapacitated such as in the hospital.	☐	☐	☐
The ESA must be supervised by and under the student's control at all times outside the student's residence.	☐	☐	☐
The student is responsible to clean up after the animal.	☐	☐	☐
The ESA must be kept on a leash if outside of the room.	☐	☐	☐
The school can inspect for fleas and ticks.	☐	☐	☐
If fleas or ticks are found, the student can be billed for the fumigation expenses.	☐	☐	☐
The student is responsible for any damages the ESA causes to the room or provided furniture.	☐	☐	☐
Students with ESAs are encouraged to place notification on their door that an animal is in the room in case of an emergency such as a fire.	☐	☐	☐
The student is required to notify the campus if the ESA is no longer required or will not be present on campus.	☐	☐	☐

(continue to next question)

21. Does the policy describe a process for an ESA to be removed from campus under certain situations?

- ☐ Unsure
- ☐ No

(continue to question #25)

- ☐ Yes

(continue to question #22)

22. Does the removal process for an ESA include at least one warning?

- ☐ Unsure
- ☐ No
- ☐ Yes

(continue to next question)

23. Indicate why an ESA might be removed from campus whether it would be for one occurrence or repeated occurrences. Select all that apply.

- ☐ If the student mistreats the animal.
- ☐ If the animal is disruptive.
- ☐ If the student abuses the animal.
- ☐ If the student leaves the animal unattended overnight.
- ☐ If the student takes the animal in areas that are not allowed such as a classroom.
- ☐ If the animal is in poor health.
- ☐ There are additional reasons described in the policy.

(if last option selected, continue to question #24)

(if last option is NOT selected, continue to question #25)

24. What are the other reasons that an ESA might be removed from campus?

(continue to next question)

25. What are the consequences for a student with an ESA who has repeated warnings about the care, control, or supervision of the animal?

(continue to next question)

Overall

26. What other things are included in the campus's ESA policy that were not included here?

(continue to next question)

27. On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campus's ESA policy?*

Very Poor	Below Average	Average	Above Average	Excellent
☐	☐	☐	☐	☐

(continue to next question)

28. Describe your thought process in regard to your rating.

(continue to next question)

29. As this is a pilot survey, what feedback and recommendations do you have about these questions which focused on the campus's ESA policy?

(continue to next question)

Staff Experiences

The focus for this section of the survey is about your experiences implementing the campus's ESA policy.

30. How many years have you been in your current position?

- ☐ Less than one year
- ☐ One year up to two years
- ☐ Two years up to three years
- ☐ Three years up to four years
- ☐ Four years up to five years
- ☐ Five years or more

(continue to next question)

31. How many students with ESAs do you anticipate will be on campus in the fall of 2020? Please use digits. _____

(continue to next question)

32. Is the number of ESAs you anticipate having on campus in the fall of 2020 _____ anticipated prior to the COVID-19 pandemic?

- ☐ Less than
- ☐ About the same as
- ☐ More than

(continue to next question)

33. How many students with ESAs were on campus last year, the **2019-2020** academic year? Please use digits. _____

(continue to next question)

34. How many students with ESAs were on campus two years ago, the **2018-2019** academic year? Please use digits. _____

(continue to next question)

35. How many requests for an ESA were **NOT** approved for:

- ☐ The fall of 2020: ____
- ☐ Last year, the 2019-2020 academic year: _____
- ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

36. How many students were approved to have an ESA but never brought it to campus:

- ☐ Last year, the 2019-2020 academic year: _____
- ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

37. How many students only brought an approved ESA for one semester, i.e. did not bring it the next semester:

- ☐ Last year, the 2019-2020 academic year: _____
- ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

38. Indicate how often you have experienced each situation below in the past two academic years, **2019-2020** and **2018-2019**.

	Never	**Very Rarely**	**Rarely**	**Occasionally**	**Frequently**	**Very Frequently**
An ESA request conflicts with another accommodation request such as a severe allergy reaction to the animal.						
A student with an ESA takes the animal to a campus location they are not supposed to.						
A student **mistakenly** misrepresents the ESA as a service animal.						
A student **intentionally** misrepresents the ESA as a service animal.						
Students request to take an ESA to their campus job due to their disability.						
Students request to take an ESA to class due to their disability.						
Students provide documentation about the need for an ESA from a paid internet site.						
A student invites other students to visit with his/her ESA.						
A student leaves the ESA unattended overnight.						
A student mistreats their ESA such as abusing the animal, not providing food or water, not providing appropriate medical care, etc.						
A student is unable to maintain control of their ESA.						
A roommate/suitemate of a student with an ESA reports a problem.						
A student does not clean up after the ESA. This could include for a dog cleaning up after toileting or for an animal such as a rabbit in a cage, not cleaning the cage.						
Students complain about an ESA.						
Students with an ESA wishing they had not requested one.						

(continue to next question)

39. Indicate how helpful the campus's ESA policy is to you in responding to the various situations.

	Have Not Experienced the Situation	**Not at All Helpful**	**Slightly Helpful**	**Moderately Helpful**	**Very Helpful**	**Extremely Helpful**
An ESA request conflicts with another accommodation request such as a severe allergy reaction to the animal.						
A student with an ESA takes the animal to a campus location they are not supposed to						
A student **mistakenly** misrepresents the ESA as a service animal						
A student **intentionally** misrepresents the ESA as a service animal						
Students request to take an ESA to their campus job due to their disability.						
Students request to take an ESA to class due to their disability.						
Students provide documentation about the need for an ESA from a paid internet site.						
A student invites other students to visit with his/her ESA.						
A student leaves the ESA unattended overnight.						
A student mistreats their ESA such as abusing the animal, not providing food or water, not providing appropriate medical care, etc.						
A student is unable to maintain control of their ESA.						
A roommate/suitemate of a student with an ESA reports a problem.						
A student does not clean up after the ESA. This could include for a dog cleaning up after toileting or for an animal such as a rabbit in a cage, not cleaning the cage.						
Students complain about an ESA.						
Students with an ESA wishing they had not requested one.						

(continue to next question)

40. From your experiences working with students and their ESAs, have you observed benefits to students with ESAs?

    ☐ Unsure

    ☐ No

    (If "Unsure" or "No", continue question 42)

    ☐ Yes

    (continue to next question)

41. Please describe the benefits to students with approved ESAs that you have observed.

    (continue to next question)

42. From your experiences of having students with ESAs on campus, have you observed benefits to students without disabilities due to ESAs being on campus?

    ☐ Unsure

    ☐ No

    (If "Unsure" or "No", continue question 44)

    ☐ Yes

    (continue to next question)

43. Please describe the benefits to students without disabilities due to ESAs being on campus.

    (continue to next question)

Overall

44. What other experiences have you had related to ESAs that were not included here?

    (continue to next question)

45. In comparison to other complaints being filed with the Office for Civil Rights or similar state or federal agency, how concerned are you about having complaints filed about the campus's ESA policies?

Extremely Concerned	Moderately Concerned	Somewhat Concerned	Slightly Concerned	Not at All Concerned
☐	☐	☐	☐	☐

(continue to next question)

46. Describe your thought process in regard to your rating.

(continue to next question)

47. In comparison to other accommodation requests, how much time do ESA requests, questions, and issues take?

Much Less Time	Slightly Less Time	About the Same	Slightly More Time	Much More Time
☐	☐	☐	☐	☐

(continue to next question)

48. Describe your thought process in regard to your rating.

(continue to next question)

49. How helpful have you found the campus's ESA policy in responding to questions and situations that arise?*

Not at All Helpful	Slightly Helpful	Moderately Helpful	Very Helpful	Extremely Helpful
☐	☐	☐	☐	☐

(continue to next question)

50. Describe your thought process in regard to your rating.

(continue to next question)

51. What do you see as the future of ESAs on campus in the next 5, 10, and/or 20 years?

(continue to next question)

52. As this is a pilot survey, what feedback and recommendations do you have about these questions which focused on the ESA experiences you've had?

(continue to next question)

53. Describe any technology issues you experienced with the survey.

(continue to next question)

54. Approximately how many minutes did it take you to complete the survey? _____

(continue to thank you page)

Thank You Page

Thank you for taking the time to complete this survey and for assisting me with my dissertation!

End of Survey

Appendix D

Pilot Reminder Email One

Date: July 22, 2020

Subject: Dissertation Pilot Survey - Emotional Support Animal Policy - Reminder

Dear (*insert name*),

My name is Christy King and I am a doctoral candidate in the Higher Education program at Immaculata University. Last week I sent you an email asking for your participation in an important pilot survey investigating the relationship between emotional support animal (ESA) policies campuses have implemented and related staff experiences.

Your participation in this survey should only take approximately 30 minutes of your time. The survey asks questions about what is included in your campus's ESA policies and your experiences as a staff person implementing the policies. You may wish to review your campus's ESA policy prior to beginning the survey.

I am hopeful that you will decide to participate in this pilot survey. All you need to do is click on the survey link which is unique to you.

(*insert survey link*)

Participation is voluntary. You may decline to answer any questions. Further, you may decide to withdraw from this study at any time without any penalty by not submitting your response.

Please complete the survey by August 6, 2020.

Your input and comments are vital. The final survey instrument will be approved by the Research Ethics Review Board at Immaculata University. There are minimal risks from participating in this study.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu, with any questions about this study.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix E

Pilot Reminder Email Two

Date: July 30, 2020

Subject: Dissertation Pilot Survey - Emotional Support Animal Policy – Only One Week Left

Dear (*insert name*),

I am writing to follow up on an email I recently sent asking for your participation in a survey investigating the relationship between emotional support animal (ESA) policies campuses have implemented and related staff experiences.

If you have already completed the survey, thank you! I appreciate your help with my dissertation.

If you have not completed the survey yet, please take some time to do so. The survey should take about 30 minutes to complete. Simply click on the survey link to begin answering the questions.

(*insert survey link*)

Your input and comments are vital and will inform the final survey. The final survey instrument will be approved by the Research Ethics Review Board at Immaculata University.

Please complete the survey by August 6, 2020.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix F

Pilot Reminder Email Three

Date: August 4, 2020

Subject: Dissertation Pilot Survey - Emotional Support Animal Policy – Just Two Days Left

Dear (*insert name*),

I am writing to follow up on an email I recently sent asking for your participation in a short pilot survey investigating emotional support animal (ESA) policies campuses have implemented and related staff experiences. The pilot survey is part of my dissertation research. Your input and comments are vital and will inform the final survey. The final survey instrument will be approved by the Research Ethics Review Board at Immaculata University.

If you have already completed the survey, thank you! I appreciate your help with my dissertation.

If you have not completed the survey yet, please take some time to do so. The survey should take less than 30 minutes to complete. Simply click on the survey link to begin answering the questions.

(*insert survey link*)

Please complete the survey by August 6, 2020.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix G

ESA Policy and Staff Experiences Survey

Implementation of Emotional Support Animal Policies and Resulting Staff Experiences

This study is being conducted by myself, Christy King, as part of my dissertation research in the Higher Education program at Immaculata University under the supervision of Carolyn Dumaresq, Ed.D. I am researching the relationship between emotional support animal (ESA) policies that campuses have implemented together with staff experiences. This study has been approved by the Research Ethics Review Board at Immaculata University before data collection in Pennsylvania.

All information you provide will be confidential. All data will be summarized. The data collected from this survey will be accessed only by the researcher and the dissertation committee. All data will be maintained in a password-protected computer database. As well, the data will be electronically archived after completion of the study and maintained for 5 years after the research has been completed.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study or to request a summary of the results when available.

Thank you for participating in the survey!

Consent

1. To participate in this survey, you must be 18 years of age or older.*

   ☐ I am 18 years of age or older and by completing this survey have voluntarily agreed to participate in this pilot study.

   (continue to question #2)

   ☐ I am less than 18 years old.

   (go to thank you page of survey)

Campus Policies

The focus for this section of the survey is about the campus's ESA policy.

General Policy Components

2. Are students allowed to have pets such as dogs and/or cats in the residence halls?

   ☐ Yes

   ☐ No

   (continue to next question)

3. Does the campus have any emotional support animal (ESA) policies?*

   ☐ Yes

   (continue to question #6)

   ☐ No

   (continue to question #4)

4. Please explain why you believe the campus does not have any emotional support animal policies.

   (continue to next question)

5. Does the campus plan on or in the process of creating an ESA policy?

   ☐ Unsure

   ☐ No

   ☐ Yes

   (go to thank you page of survey)

6. Rate your knowledge of the campus's ESA policy.*

Not at All Knowledgeable	Slightly Knowledgeable	Somewhat Knowledgeable	Moderately Knowledgeable	Extremely Knowledgeable
☐	☐	☐	☐	☐

(If "Not at All Knowledgeable" or "Slightly Knowledgeable" are selected, taken to thank you page of survey)

(otherwise, continue to next question)

7. How often do you reference the ESA policy for things such as review of an accommodation request, discussing a complaint with a student, dealing with a policy violation, etc.?

   ☐ Almost daily

   ☐ One to two times a week

   ☐ One to two times a month

(continue to next question)

8. For each statement, indicate whether each item is mentioned in the campus ESA policy.

Statement	**Unsure**	**No**	**Yes**
The ESA policy is a separate policy from other policies such as service animals.	☐	☐	☐
The policy defines an ESA.	☐	☐	☐
The policy defines a service animal.	☐	☐	☐
The policy defines a pet.	☐	☐	☐
The policy defines a therapy animal.	☐	☐	☐
Any student with an ESA is required to live in a particular residence hall(s)	☐	☐	☐
The policy outlines that training is available to faculty and staff (full time, part time, or student employees) about ESAs.	☐	☐	☐

(If "Yes" selected for last statement, go to question #9)

(If "No" or "Unsure" selected for last statement, go to question #10)

9. In the previous question, “Yes” was selected to the statement that training is available to faculty and staff. Please select the staff groups that may receive training. Select all that apply.

    ☐ Academic Affairs

    ☐ Campus Police/Public safety

    ☐ Counseling Services

    ☐ Disability Services

    ☐ Faculty

    ☐ Residence Life

    ☐ Residence Life – student employees

    ☐ Other – Write In _____

(continue to next question)

10. Indicate the offices/departments that participated in the development of the campus’s ESA policy. Select all that apply.

    ☐ Academic Affairs

    ☐ Campus Police/Public Safety

    ☐ Counseling Services

    ☐ Dean of Students

    ☐ Disability Services

    ☐ External Consultant

    ☐ Legal Services

    ☐ Residence life

    ☐ Student Disciplinary Board/Honor Council

    ☐ Other – Write In _____

    ☐ None of these

    ☐ I do not know.

(continue to next question)

11. For each statement, indicate if the item is available.

Statement	Unsure	No	Yes
A pro/con list is available to students interested in having an ESA on campus.	☐	☐	☐
There are frequently asked questions about ESAs available to **students**.	☐	☐	☐
There are frequently asked questions about ESAs available to **faculty and staff**.	☐	☐	☐

(continue to next question)

Animals

12. This question focuses on the animals allowed on campus as ESAs. For each statement, consider whether each item is mentioned in the campus ESA policy.

Statement	Unsure	No	Yes
The policy limits the type of animal that can be an ESA.	☐	☐	☐
Non-domesticated or exotic animals such as monkeys are prohibited as ESAs except for special exceptions.	☐	☐	☐
There is a weight size limit on the type of animal that can be an ESA except for special exceptions.	☐	☐	☐
There is a height limit on the type of animal that can be an ESA except for special exceptions.	☐	☐	☐
The animal must be house trained, as appropriate.	☐	☐	☐
The animal must be vaccinated according to state and local requirements.	☐	☐	☐
The animal must be licensed according to state and local requirements.	☐	☐	☐
The animal must be in good health.	☐	☐	☐
An alternate caregiver for the animal must be on file.	☐	☐	☐

(continue to next question)

Documentation

13. How many calendar days prior to the student's desire to have an ESA on campus does the policy suggest a student should submit documentation? ____

(continue to next question)

14. Within how many **calendar** days does the policy state the ESA request will be reviewed? ____

(continue to next question)

15. Does the campus ESA policy require a statement or letter from a licensed physical health or mental health care practitioner?

☐ Unsure

☐ No

(continue to next question #19)

☐ Yes

(continue to question #16)

16. Does the campus provide a specific list of requirements or form for a practitioner to complete?

☐ Unsure

☐ No

☐ Yes

(continue to next question)

17. This question focuses on the documentation from a licensed physical health or mental health care practitioner. The documentation could be in a letter or on a campus specific form. For each statement, consider whether each item is included in the campus ESA policy.

Statement	Unsure	No	Yes
The license number of the practitioner.	☐	☐	☐
Whether the student is under the care of the practitioner.	☐	☐	☐
Whether the practitioner "prescribed" the ESA for the student.	☐	☐	☐
A statement that the student has a disability.	☐	☐	☐
The specific disability diagnosis(es) for the student.	☐	☐	☐
A description of the relationship between the student's disability and how the ESA helps the student.	☐	☐	☐
The length of time the practitioner has been working with the student.	☐	☐	☐

Statement	Unsure	No	Yes
The student should request the documentation from a practitioner he or she has been working with for a minimum amount of time.	☐	☐	☐

(If "Yes" selected for last statement, go to question #15)

(If "No" selected for last statement, go to question #16)

18. What is the minimum length of time, in months, stated in the policy that the student should be under the provider's care prior to the request? ____

(continue to next question)

19. This question focuses on what the policy states about the information that a **student** completes or submits. For each statement, consider whether each item is included in the campus ESA policy.

Statement	Unsure	No	Yes
A statement that he or she has a disability.	☐	☐	☐
The specific disability diagnosis(es) that he or she has.	☐	☐	☐
A description of the relationship between the disability and how the ESA helps him/her.	☐	☐	☐
The student is required to submit a new letter for the same ESA on an annual basis.	☐	☐	☐
Submission of veterinary records for the ESA as appropriate.	☐	☐	☐

(continue to next question)

Student Responsibilities

20. This question focuses on the student responsibilities included in the campus's ESA policy or related guidance for students. For each statement, consider whether each item is included in the campus ESA policy or other guidance.

Statement	Unsure	No	Yes
Once an ESA is approved, the student must sign a contract to have the ESA on campus.	☐	☐	☐
Where the student is permitted to have the ESA on campus.	☐	☐	☐

Statement	Unsure	No	Yes
A student with an ESA must consent to limited sharing of information so that his or her roommate(s) can be notified prior to the ESA being in the room.	☐	☐	☐
The animal is NOT allowed to be left in the care of someone other than the student whose ESA it is such as for toileting.	☐	☐	☐
The animal is NOT allowed to be left alone overnight.	☐	☐	☐
The student must provide emergency contact information of a person off campus who can care for the ESA if the student is incapacitated such as in the hospital.	☐	☐	☐
The ESA must be supervised by and under the student's control at all times outside the student's residence.	☐	☐	☐
The student is responsible to clean up after the animal.	☐	☐	☐
The ESA must be kept on a leash if outside of the room.	☐	☐	☐
The school can inspect for fleas and ticks.	☐	☐	☐
If fleas or ticks are found, the student can be billed for the fumigation expenses.	☐	☐	☐
The student is responsible for any damages the ESA causes to the room or provided furniture.	☐	☐	☐
Students with ESAs are encouraged to place notification on their door that an animal is in the room in case of an emergency such as a fire.	☐	☐	☐
The student is required to notify the campus if the ESA is no longer required or will not be present on campus.	☐	☐	☐

(continue to next question)

21. Does the policy describe a process for an ESA to be removed from campus under certain situations?

- ☐ Unsure
- ☐ No

(continue to question #25)

- ☐ Yes

(continue to question #22)

22. Does the removal process for an ESA include at least one warning?

- ☐ Unsure
- ☐ No
- ☐ Yes

(continue to next question)

23. Indicate why an ESA might be removed from campus whether it would be for one occurrence or repeated occurrences. Select all that apply.

- ☐ If the student mistreats the animal.
- ☐ If the animal is disruptive.
- ☐ If the student abuses the animal.
- ☐ If the student leaves the animal unattended overnight.
- ☐ If the student takes the animal in areas that are not allowed such as a classroom.
- ☐ If the animal is in poor health.
- ☐ There are additional reasons described in the policy.

(if last option selected, continue to question #24)

(if last option is NOT selected, continue to question #25)

24. What are the other reasons that an ESA might be removed from campus?

(continue to next question)

25. What are the consequences for a student with an ESA who has repeated warnings about the care, control, or supervision of the animal?

(continue to next question)

Overall

26. What other things are included in the campus's ESA policy that were not included here?

(continue to next question)

27. On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campus's ESA policy?*

Very Poor	Below Average	Average	Above Average	Excellent
☐	☐	☐	☐	☐

(continue to next question)

28. Describe your thought process in regard to your rating.

(continue to next question)

Staff Experiences

The focus for this section of the survey is about your experiences implementing the campus's ESA policy.

29. How many years have you been in your current position?

- ☐ Less than one year
- ☐ One year up to two years
- ☐ Two years up to three years
- ☐ Three years up to four years
- ☐ Four years up to five years
- ☐ Five years or more

(continue to next question)

30. How many students with ESAs do you anticipate will be on campus in the fall of 2020? Please use digits. _____

(continue to next question)

31. Is the number of ESAs you anticipate having on campus in the fall of 2020 _____ anticipated prior to the COVID-19 pandemic?

    ☐ Less than

    ☐ About the same as

    ☐ More than

(continue to next question)

32. How many students with ESAs were on campus last year, the **2019-2020** academic year? Please use digits. _____

(continue to next question)

33. How many students with ESAs were on campus two years ago, the **2018-2019** academic year? Please use digits. _____

(continue to next question)

34. How many requests for an ESA were **NOT** approved for:

    ☐ The fall of 2020: ____

    ☐ Last year, the 2019-2020 academic year: _____

    ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

35. How many students were approved to have an ESA but never brought it to campus:

    ☐ Last year, the 2019-2020 academic year: _____

    ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

36. How many students only brought an approved ESA for one semester, i.e. did not bring it the next semester:

    ☐ Last year, the 2019-2020 academic year: _____

    ☐ Two years ago, the 2018-2019 academic year: _____

(continue to next question)

37. Indicate how often you have experienced each situation below in the past two academic years, **2019-2020** and **2018-2019**.

	Never	**Very Rarely**	**Rarely**	**Occasionally**	**Frequently**	**Very Frequently**
An ESA request conflicts with another accommodation request such as a severe allergy reaction to the animal.						
A student with an ESA takes the animal to a campus location they are not supposed to.						
A student **mistakenly** misrepresents the ESA as a service animal.						
A student **intentionally** misrepresents the ESA as a service animal.						
Students request to take an ESA to their campus job due to their disability.						
Students request to take an ESA to class due to their disability.						
Students provide documentation about the need for an ESA from a paid internet site.						
A student invites other students to visit with his/her ESA.						
A student leaves the ESA unattended overnight.						
A student mistreats their ESA such as abusing the animal, not providing food or water, not providing appropriate medical care, etc.						
A student is unable to maintain control of their ESA.						
A roommate/suitemate of a student with an ESA reports a problem.						
A student does not clean up after the ESA. This could include for a dog cleaning up after toileting or for an animal such as a rabbit in a cage, not cleaning the cage.						
Students complain about an ESA.						
Students with an ESA wishing they had not requested one.						

(continue to next question)

38. Indicate how helpful the campus's ESA policy is to you in responding to the various situations.

	Have Not Experienced the Situation	**Not at All Helpful**	**Slightly Helpful**	**Moderately Helpful**	**Very Helpful**	**Extremely Helpful**
An ESA request conflicts with another accommodation request such as a severe allergy reaction to the animal.						
A student with an ESA takes the animal to a campus location they are not supposed to						
A student **mistakenly** misrepresents the ESA as a service animal						
A student **intentionally** misrepresents the ESA as a service animal						
Students request to take an ESA to their campus job due to their disability.						
Students request to take an ESA to class due to their disability.						
Students provide documentation about the need for an ESA from a paid internet site.						
A student invites other students to visit with his/her ESA.						
A student leaves the ESA unattended overnight.						
A student mistreats their ESA such as abusing the animal, not providing food or water, not providing appropriate medical care, etc.						
A student is unable to maintain control of their ESA.						
A roommate/suitemate of a student with an ESA reports a problem.						
A student does not clean up after the ESA. This could include for a dog cleaning up after toileting or for an animal such as a rabbit in a cage, not cleaning the cage.						
Students complain about an ESA.						
Students with an ESA wishing they had not requested one.						

(continue to next question)

39. From your experiences working with students and their ESAs, have you observed benefits to students with ESAs?

    ☐ Unsure

    ☐ No

    (If "Unsure" or "No", continue question 41)

    ☐ Yes

    (continue to next question)

40. Please describe the benefits to students with approved ESAs that you have observed.

    (continue to next question)

41. From your experiences of having students with ESAs on campus, have you observed benefits to students without disabilities due to ESAs being on campus?

    ☐ Unsure

    ☐ No

    (If "Unsure" or "No", continue question 43)

    ☐ Yes

    (continue to next question)

42. Please describe the benefits to students without disabilities due to ESAs being on campus.

    (continue to next question)

Overall

43. What other experiences have you had related to ESAs that were not included here?

    (continue to next question)

44. In comparison to other complaints being filed with the Office for Civil Rights or similar state or federal agency, how concerned are you about having complaints filed about the campus's ESA policies?

Extremely Concerned	Moderately Concerned	Somewhat Concerned	Slightly Concerned	Not at All Concerned
☐	☐	☐	☐	☐

(continue to next question)

45. Describe your thought process in regard to your rating.

(continue to next question)

46. In comparison to other accommodation requests, how much time do ESA requests, questions, and issues take?

Much Less Time	Slightly Less Time	About the Same	Slightly More Time	Much More Time
☐	☐	☐	☐	☐

(continue to next question)

47. Describe your thought process in regard to your rating.

(continue to next question)

48. How helpful have you found the campus's ESA policy in responding to questions and situations that arise?*

Not at All Helpful	Slightly Helpful	Moderately Helpful	Very Helpful	Extremely Helpful
☐	☐	☐	☐	☐

(continue to next question)

49. Describe your thought process in regard to your rating.

(continue to next question)

50. What do you see as the future of ESAs on campus in the next 5, 10, and/or 20 years?

(continue to next question)

Thank You Page

Thank you for taking the time to complete this survey!

End of Survey

Appendix H

Question Crosswalk to Literature Source

Question Number	Question/Statement	Foundation for Question
Consent		
1	To participate in this survey, you must be 18 years of age or older.	Informed Consent Question
Campus Policies		
2	Are students allowed to have pets such as dogs and/or cats in the residence halls?	Informational
3	Does the campus have any emotional support animal (ESA) policies?*	DOJ & HUD (2004) Purpose of survey and survey decision point
4	Please explain why you believe the campus does not have any emotional support animal policies.	Explanation if question #3 is "No"
5	Does the campus plan on or in the process of creating an ESA policy?	Further understanding of #3 if "No"
6	Rate your knowledge of the campus's ESA policy.	Survey decision point
7	How often do you reference the ESA policy for things such as review of an accommodation request, discussing a complaint with a student, dealing with a policy violation, etc.?	Expert panel member
8	The ESA policy is a separate policy from other policies such as service animals.	Sutton's (2016) description of basis for Kent State University lawsuit
	The policy defines an ESA.	Kogan et al. (2016)
	The policy defines a service animal.	Kogan et al. (2016)
	The policy defines a pet.	Extrapolated from Kogan et al. (2016)
	The policy defines a therapy animal.	Kogan et al. (2016)
	Any student with an ESA is required to live in a particular residence hall(s).	Hope (2016)

Question Number	Question/Statement	Foundation for Question
	The policy outlines that training is available to faculty and staff (full time, part time, or student employees) about ESAs.	Green (2019) – generally stated Hope (2017) – focus on service animals *HUD v. Riverbay* (1994) NACUA (2011) – residence life and disability services Salminen & Gregory (2018)
9	In the previous question, "Yes" was selected to the statement that training is available to faculty and staff. Please select the staff groups that may receive training. Select all that apply.	Green (2019) – generally stated Hope (2017) – focus on service animals *HUD v. Riverbay* (1994) NACUA (2011) – residence life and disability services Salminen & Gregory (2018)
10	Indicate the offices/departments that participated in the development of the campus's ESA policy. Select all that apply.	Adams et al. (2017) – counseling center Kogan et al. (2016)
11	A pro/con list is available to students interested in having an ESA on campus.	Kogan et al. (2016)
	There are frequently asked questions about ESAs available to **students**.	Kogan et al. (2016)
	There are frequently asked questions about ESAs available to **faculty and staff**.	Extrapolated from Kogan et al. (2016
12	The policy limits the type of animal that can be an ESA.	Huss (2012)

Question Number	Question/Statement	Foundation for Question
	Non-domesticated or exotic animals such as monkeys are prohibited as ESAs except for special exceptions.	Huss (2012) Masinter (2015) NACAU (2011)
	There is a weight size limit on the type of animal that can be an ESA except for special exceptions.	Masinter (2015)
	There is a height limit on the type of animal that can be an ESA except for special exceptions.	Masinter (2015)
	The animal must be house trained, as appropriate.	Masinter (2015) NACAU (2011)
	The animal must be vaccinated according to state and local requirements.	Masinter (2015)
	The animal must be licensed according to state and local requirements.	NACAU (2011) Von Bergen (2015)
	The animal must be in good health.	NACAU (2011) Von Bergen (2015)
	An alternate caregiver for the animal must be on file.	Expert panel member
13	How many calendar days prior to the student's desire to have an ESA on campus does the policy suggest a student should submit documentation?	NACAU (2011)
14	Within how many **calendar** days does the policy state the ESA request will be reviewed?	DOJ & HUD (2011) *U.S.A. v. University of Nebraska at Kearny* (2015)
15	Does the campus ESA policy require a statement or letter from a licensed physical health or mental health care practitioner?	Chandler (2019)
16	Does the campus provide a specific list of requirements or form for a practitioner to complete?	Expert panel member Masinter (2016)
17	The license number of the practitioner.	Masinter (2016)
	Whether the student is under the care of the practitioner.	Chandler (2019) Masinter (2016)

Question Number	Question/Statement	Foundation for Question
	Whether the practitioner "prescribed" the ESA for the student.	Masinter (2016)
	A statement that the student has a disability.	Von Bergen (2015)
	The specific disability diagnosis(es) for the student.	Chandler (2019) – not to be asked
	A description of the relationship between the student's disability and how the ESA helps the student.	Chandler (2019) Von Bergen (2015)
	The length of time the practitioner has been working with the student.	Masinter (2016)
	The student should request the documentation from a practitioner he or she has been working with for a minimum amount of time.	Masinter (2016)
18	What is the minimum length of time, in months, stated in the policy that the student should be under the provider's care prior to the request?	Explanation if the last statement in question #17 is "Yes"
19	A statement that he or she has a disability.	Von Bergen (2015)
	The specific disability diagnosis(es) that he or she has.	Chandler (2019) – not to be asked
	A description of the relationship between the disability and how the ESA helps him/her.	Von Bergen (2015)
	The student is required to submit a new letter for the same ESA on an annual basis.	Chandler (2019)
	Submission of veterinary records for the ESA as appropriate.	Expert panel member
20	Once an ESA is approved, the student must sign a contract to have the ESA on campus.	Adams et al. (2017)
	Where the student is permitted to have the ESA on campus.	Salminen & Gregory (2018) Tedeschi et al. (2015)
	A student with an ESA must consent to limited sharing of information so that his or her roommate(s) can be notified prior to the ESA being in the room.	Hope (2016) *U.S.A. v. University of Nebraska at Kearny* (2015)
	The animal is NOT allowed to be left in the care of someone other than the student whose ESA it is such as for toileting.	Masinter (2015)
	The animal is NOT allowed to be left alone overnight.	Masinter (2015)

Question Number	Question/Statement	Foundation for Question
	The student must provide emergency contact information of a person off campus who can care for the ESA if the student is incapacitated such as in the hospital.	Kogan et al. (2016)
	The ESA must be supervised by and under the student's control at all times outside the student's residence.	Shackelford (2013)
	The student is responsible to clean up after the animal.	NACAU (2011)
	The ESA must be kept on a leash if outside of the room.	NACAU (2011)
	The school can inspect for fleas and ticks.	Masinter (2015)
	If fleas or ticks are found, the student can be billed for the fumigation expenses.	Masinter (2015)
	The student is responsible for any damages the ESA causes to the room or provided furniture.	Masinter (2015)
	Students with ESAs are encouraged to place notification on their door that an animal is in the room in case of an emergency such as a fire.	Kogan et al. (2016)
	The student is required to notify the campus if the ESA is no longer required or will not be present on campus.	*U.S.A. v. University of Nebraska at Kearny* (2015)
21	Does the policy describe a process for an ESA to be removed from campus under certain situations?	Adams et al. (2017) Masinter (2015)
22	Does the removal process for an ESA include at least one warning?	Adams et al. (2017)
23	Indicate why an ESA might be removed from campus whether it would be for one occurrence or repeated occurrences. Select all that apply.	Explanation if question #21 is "Yes"
24	What are the other reasons that an ESA might be removed from campus?	Explanation if "Other" selected in question #23
25	What are the consequences for a student with an ESA who has repeated warnings about the care, control, or supervision of the animal?	Expert panel member
26	What other things are included in the campus's ESA policy that were not included here?	Opportunity for respondent to provide additional policy components not contained in the survey.

Question Number	Question/Statement	Foundation for Question
27	On a scale of 1 to 5 with 5 being the best and 1 being the worst, how would you rate the campus's ESA policy?	Research question
28	Describe your thought process in regard to your rating.	Explanation of response to question #27
Staff Experiences		
29	How many years have you been in your current position?	Expert panel member
30	How many students with ESAs do you anticipate will be on campus in the fall of 2020? Please use digits.	Clark (2017) National Service Animal Registry (n.d.) Stockman (2019) Yamamoto et al. (2015)
31	Is the number of ESAs you anticipate having on campus in the fall of 2020 _____ anticipated prior to the COVID-19 pandemic?	Expert panel member
32	How many students with ESAs were on campus last year, the **2019-2020** academic year? Please use digits.	Clark (2017) National Service Animal Registry (n.d.) Stockman (2019) Yamamoto et al. (2015)
33	How many students with ESAs were on campus two years ago, the **2018-2019** academic year? Please use digits.	Clark (2017) National Service Animal Registry (n.d.) Stockman (2019) Yamamoto et al. (2015)
34	How many requests for an ESA were **NOT** approved for: the fall of 2020; last year, the 2019-2020 academic year; and two years ago, the 2018-2019 academic year?	Clark (2017) National Service Animal Registry (n.d.) Stockman (2019) Yamamoto et al. (2015)

Question Number	Question/Statement	Foundation for Question
35	How many students were approved to have an ESA but never brought it to campus: last year, the 2019-2020 academic year; two years ago, the 2018-2019 academic year?	Expert panel member
36	How many students only brought an approved ESA for one semester, i.e. did not bring it the next semester: last year, the 2019-2020 academic year; two years ago, the 2018-2019 academic year?	Expert panel member
37 and 38	An ESA request conflicts with another accommodation request such as a severe allergy reaction to the animal.	DOJ (2011) Masinter (2018) Von Bergen (2015)
	A student with an ESA takes the animal to a campus location they are not supposed to.	Salminen & Gregory (2018) Tedeschi et al. (2015)
	A student **mistakenly** misrepresents the ESA as a service animal.	Chandler (2019) Masinter (2019)
	A student **intentionally** misrepresents the ESA as a service animal.	Chandler (2019) Masinter (2019)
	Students request to take an ESA to their campus job due to their disability.	"Review Rulings" (2019)
	Students request to take an ESA to class due to their disability.	Masinter (2015) "Review Rulings" (2019)
	Students provide documentation about the need for an ESA from a paid internet site.	Chandler (2019) Gose (2016)
	A student invites other students to visit with his/her ESA.	Expert panel member
	A student leaves the ESA unattended overnight.	Masinter (2015)
	A student mistreats their ESA such as abusing the animal, not providing food or water, not providing appropriate medical care, etc.	Adams et al. (2017) Masinter (2015)
	A student is unable to maintain control of their ESA.	Shackelford (2013)
	A roommate/suitemate of a student with an ESA reports a problem.	Meredith College (2020)

Question Number	Question/Statement	Foundation for Question
	A student does not clean up after the ESA. This could include for a dog cleaning up after toileting or for an animal such as a rabbit in a cage, not cleaning the cage.	NACAU (2011)
	Students complain about an ESA.	Meredith College (2020)
	Students with an ESA wishing they had not requested one.	Expert panel member Yamamoto & Hart (2019)
39	From your experiences working with students and their ESAs, have you observed benefits to students with ESAs?	Extrapolated from: Clark (2017) Yamamoto and Hart (2019)
40	Please describe the benefits to students with approved ESAs that you have observed.	Expert panel member
41	From your experiences of having students with ESAs on campus, have you observed benefits to students without disabilities due to ESAs being on campus?	Extrapolated from: Clark (2017) Expert panel member Yamamoto and Hart (2019)
42	Please describe the benefits to students without disabilities due to ESAs being on campus.	Expert panel member
43	What other experiences have you had related to ESAs that were not included here?	Opportunity for respondent to provide additional experiences not contained in the survey.
44	In comparison to other complaints being filed with the Office for Civil Rights or similar state or federal agency, how concerned are you about having complaints filed about the campus's ESA policies?	Component of research question
45	Describe your thought process in regard to your rating.	Explanation of response to question #44
46	In comparison to other accommodation requests, how much time do ESA requests, questions, and issues take?	Component of research question
47	Describe your thought process in regard to your rating.	Explanation of response to question #46

Question Number	Question/Statement	Foundation for Question
48	How helpful have you found the campus's ESA policy in responding to questions and situations that arise?*	Component of research question
49	Describe your thought process in regard to your rating.	Explanation of response to question #48
50	What do you see as the future of ESAs on campus in the next 5, 10, and/or 20 years?	Faculty member

Appendix I

Recruitment Email

Date:

Subject: Dissertation Study - Emotional Support Animal Policy

Dear (*insert name*),

My name is Christy King and I am a doctoral candidate in the Higher Education program at Immaculata University. I am researching the relationship between emotional support animal (ESA) policies campuses have implemented and related staff experiences.

I am hopeful that you will decide to participate in this survey. All you need to do is click on the survey link which is unique to you.

(*insert survey link*)

The survey asks questions about what is included in your campus's policies about ESAs and your experiences as a staff person implementing the policies. You may wish to review your campus's ESA policy prior to beginning the survey.

Your participation is voluntary and will take approximately 15-30 minutes of your time. You may decline to answer any questions. Further, you may decide to withdraw from this study at any time without any penalty by not submitting your response. Should this web-based survey pose a problem, please contact me, and I will make arrangements to provide you another method of participation.

This study was approved by the Research Ethics Review Board at Immaculata University. All information you provide will be confidential. All the data will be summarized. Data collected from this survey will be accessed only by the researcher and the dissertation supervisor. All data and materials will be maintained on a password-protected computer database. As well, the data will be electronically archived after completion of the study and maintained for 5 years. There are minimal risks from participating in this study, which may include fatigue from answering the questions. You can stop, rest, and restart the electronic survey.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study or to request a summary of the results. If you have any comments or concerns resulting from your participation in this study, please contact the Chair of the Research Ethics Review Board, Marcia Parris, Ed.D., 484-323-3210, mparris@immaculata.edu.

Please complete the survey by Friday, November 13, 2020.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix J

Reminder Email One

Date:

Subject: Dissertation Study - Emotional Support Animal Policy - Reminder

Dear (*insert name*),

My name is Christy King and I am a doctoral candidate in the Higher Education program at Immaculata University. Last week I sent you an email asking for your participation in an important survey investigating the relationship between emotional support animal (ESA) policies campuses have implemented and related staff experiences.

Your participation in this survey should only take approximately 15-30 minutes of your time. The survey asks questions about what is included in your campus's ESA policies and your experiences as a staff person implementing the policies. You may wish to review your campus's ESA policy prior to beginning the survey.

I am hopeful that you will decide to participate in this pilot survey. All you need to do is click on the survey link which is unique to you to begin or complete the survey.

(*insert survey link*)

Your participation is voluntary. You may decline to answer any questions. Further, you may decide to withdraw from this study at any time without any penalty by not submitting your response.

Your input and comments are vital. This study was approved by the Research Ethics Review Board at Immaculata University. There are minimal risks from participating in this study.

Please complete the survey by Friday, November 13, 2020.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study. If you have any comments or concerns resulting from your participation in this study, please contact the Chair of the Research Ethics Review Board, Marcia Parris, Ed.D., 484-323-3210, mparris@immaculata.edu.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix K

Reminder Email Two

Date:

Subject: Dissertation Survey - Emotional Support Animal Policy – Only One Week Left

Dear (*insert name*),

I am writing to follow up on an email I recently sent asking for your participation in a survey investigating the relationship between what emotional support animal (ESA) policies campuses have implemented and related staff experiences.

If you have already completed the survey, thank you! I appreciate your help with my dissertation research.

If you have not completed the survey yet, please join your colleagues and take some time to do so. The survey only take about 15-30 minutes to complete. Simply click on the survey link to begin answering the questions.

(*insert survey link*)

Your input and comments are vital. This study was approved by the Research Ethics Review Board at Immaculata University.

Please complete the survey by Friday, November 13, 2020.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study. If you have any comments or concerns resulting from your participation in this study, please contact the Chair of the Research Ethics Review Board, Marcia Parris, Ed.D., 484-323-3210, mparris@immaculata.edu.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix L

Reminder Email Three

Date:

Subject: Dissertation Survey - Emotional Support Animal Policy – Just Two Days Left

Dear (*insert name*),

I am writing to follow up on an email I recently sent asking for your participation in a short survey investigating emotional support animal (ESA) policies campuses have implemented and related staff experiences. The survey is part of my dissertation research. Your input and comments are vital. This study was approved by the Research Ethics Review Board at Immaculata University.

If you have already completed the survey, thank you! I appreciate your help with my dissertation research.

If you have not completed the survey yet, please join your colleagues and take some time to do so. The survey should only take about 15-30 minutes to complete. Simply click on the survey link to begin answering the questions.

(*insert survey link*)

Please complete the survey by Friday, November 13, 2020.

Please contact Christy King, cking1@mail.immaculata.edu, or Carolyn Dumaresq, Ed.D., cdumaresq@mail.immaculata.edu with any questions about this study. If you have any comments or concerns resulting from your participation in this study, please contact the Chair of the Research Ethics Review Board, Marcia Parris, Ed.D., 484-323-3210, mparris@immaculata.edu.

Thank you for taking the time to complete the survey!

Sincerely,

Christy King

Appendix M

County Class Population Size

Each county in Pennsylvania is assigned a class based on population size. The County Commissioners Association of Pennsylvania (n.d.) lists the class, population, and corresponding counties.

County Class	Population Size	Number of Counties
First	1,500,000 or more	1
Second	500,000 to 1,499,999	4
Third	210,000 to 499,999	26
Fourth	145,000 to 209,999	9
Fifth	90,000 to 144,999	7
Sixth	45,000 to 89,999	24
Seventh	20,000 to 44,999	4
Eighth	Less than 20,000	6