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RE: ISO "Assistance Dog" standard proposal (TS/P 295)

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Mr. Cornish:

The Netherlands ISO proposal, TS/P 295, pushes for a universal standard for the creation and use of assistance dogs (the equivalent of "service animals" under US law, or "service dogs"). Laws and standards that dally with disability rights must fundamentally honor the personhood and autonomy of disabled individuals. We believe the kind of standard proposed is not only patently unnecessary and out of place for ISO and member organizations like ANSI, but that it would be predictably harmful for disabled people.

ISO standards are intended as voluntary industry standards. There are already voluntary industry standards for service dog programs, through the International Guide Dog Federation (IGDF) and Assistance Dogs International (ADI). By this reckoning on its own, there's no need for a relevant ISO standard.

There's more to it, though. In describing the purpose and justification on page 9, the proposal author says:

Approximately, 50 000 working teams globally are supported by organizations who are members of IGDF and ADI. In both cases, the standards are developed, monitored and evaluated by the sector or industry themselves; it would be desirable to have independent measures as ISO standards for this purpose.

If we wonder why or for whom these ISO standards would be desirable—and for whom they might not be—we get a very telling answer in the rest of the paragraph:

Besides the guide and assistance dog service providers which are affiliated with one of these two international organizations, there are

also service providers that are not a member of one of these international organizations. Most likely, these assistance dog service providers will have to comply in the future with the ISO standards and in general this will have a positive impact on the quality of the assistance dogs and provide a higher level of assurance for the users.

As the author tells it, a major point of an ISO standard is to try to force non-IGDF/ADI programs to comply with the kind of standards IGDF and ADI prefer. This might sound neutral or even good to an outsider, but there are important reasons for a service dog program not to seek accreditation under this kind of standard.

As we understand it, ISO prefers not to use large corporations to create standards only large corporations can follow. Some service dog providers do not seek accreditation under IGDF or ADI standards because it is expensive to do so. Other providers are not worried about the expense, but the size or structure of their operation simply does not match the mindset of the standards' creation. (Contrast the professional dog trainer, at one end, with any enormous, well-known service dog program.) And some providers may simply not agree with the type of advocacy and political activity the accrediting agencies engage in, so they don't want their resources to support those endeavors.

Perhaps most importantly, though, service dog breeding, feeding, training, and use are in a constant state of improvement and innovation. With so much room for beneficial development, some providers only see a stifling disadvantage in being required to hold fast to stale standards.

The kind of forced compliance that the proposal's author explicitly anticipates is a bleak and harmful prospect for many service dog providers.

As a reminder, the author writes that "this [forced compliance] will have a positive impact on the quality of the assistance dogs and provide a higher level of assurance for the users." We easily concede that not everyone who says they provide service dogs is praiseworthy. It may also be possible that if all service dog providers had to comply with an IGDF/ADI standard, the average "quality" of service dogs could even increase.

However, these possible merits of forced compliance ignore the bigger picture.

You can like these agencies or their standards, but not want IGDF or ADI to be overseers of all service dog provision. If there were forced compliance, many of the providers described above would shut down. It would also be much more difficult for new providers to start up.

This means that forced compliance to an IGDF/ADI-type standard would lead to even fewer service dog providers. There is already an enormously higher demand than there is supply. The devil's bargain of the proposal gains only marginally higher-average-quality service dogs but loses the ability to help many disabled people at all.

You might think that it's okay to pass an ISO standard as a *voluntary* standard and not worry about whether anyone would try to force compliance. Defenders of disability rights cannot afford the luxury of this optimistic indifference. Apart from the proposal author already indicating that forced compliance is the goal, we already have evidence of this kind of push.

In just [one instance from 2016](#), Illinois state legislators considered HB5807. This bill would have made several ADI standards into law, at the expense of disabled residents. We know they were ADI standards because the bill included this text:

10 (3) the service dog meet all the standards as laid out
11 in the Assistance Dogs International minimum standards for
12 assistance dogs in public and be equally well behaved in
13 the home;

This push for power and control does not happen on its own. It is part of an historical trajectory and cannot be discounted. If IGDF/ADI-style standards were to be elevated to ISO standards, these corporations' proponents would have an easier time inserting themselves into law as agencies that control the market. This would cause more harm than benefit.

The most important factor to bear in mind is that anything touching this topic is wholly enmeshed with disability rights or their hindrance. The reason service dogs exist is to help disabled individuals, not corporations. An ISO standard must not put disabled people at serious risk of having less ability to responsibly have their needs met and engage with their communities.

The proposal author recognizes that there are owner-trainers, but how these disabled individuals would be treated under an IGDF/ADI-style scheme appears to be tacked on as an afterthought. The proposal notes:

An increasing number of persons are choosing to source and sometimes train their own assistance dog, many times very successfully. There needs to be equity of standards and assessment for these teams so that they too can gain access to public spaces and transportation. (9)

This sounds pleasant, but fails to face reality. The sort of "equity" ADI relies on forces owner-trainers to spend an entirely undue amount of time and money with ADI programs—and there are shockingly few ADI programs even available to accommodate this.

Owner-trainers tend to train their own dogs over the course of 1–3 years with the assistance of a local professional dog trainer that has nothing to do with ADI or IGDF. ADI-based "certification" for owner-trainers in the US involves traveling to one of only four programs in the country—none of which work with all types of disability—and training there for half a year. Disabled people are less likely to have the sort of wealth or wherewithal that this requires.

Similar to many smaller service dog providers, many disabled individuals prefer a tailored approach to service dogs, rather than a one-size-fits-many approach. There simply is no universal wiring-diagram for service dogs to be had. Too much variation can go into the creation of a successful service dog team for the output to be engineered.

We have read standards that assume dogs are all the same size or that everyone with a certain type of disability has exactly the same needs or lifestyle. But the product of service dog production is a multifaceted, living service dog team. It simply misses the point of having service dogs to assume an exclusionary, assembly-line-factory perspective, forcing every team to conform to one model or be disallowed. Leaving tens of thousands of owner-trainers out in the cold for the vainglory of a given standard is the opposite of disability justice.

This is not to say that we simply need to put our heads together and we can produce a new detailed standard that works for everyone. The point is that this is a dreamily idealistic, impossible goal.

And this is not for lack of trying. It's a popular thought experiment in the service dog community, but the result is always a disproved hypothesis.

Here are just a few examples of problems with trying to push detailed service dog standards on everyone. You can't force breeder protocols because not all service dogs come from breeders, nor do service dogs from breeders always come from in-program breeding that has an IGDF/ADI-aligned system. You can't force a certain diet because dogs can develop food allergies or other gastrointestinal/feeding issues, which can easily be accommodated outside of feeding protocols without affecting the dog's working ability. You can't force specific working/heeling positions because different working positions work best for different teams and can change over time to better meet the team's evolving needs.

Is there some acceptable form an ISO assistance dog standard could take, if not one that tries to articulate every single aspect of service dog production and use? This path is swollen to bursting with tension between (1) the concentrated areas it is good to regulate and (2) what the practical implications would be of an ISO process.

On the one hand, if a service dog standard were to focus only on acceptable public behavior by service dog teams and by authority figures, that might be fantastically helpful. Service dog teams and gatekeepers should have clear guidance on which kinds of bad behaviors warrant removal of a dog (whether it's a service dog or not).

Access should be based on whether the dog is behaving at the moment, not how it behaved on an organization's test for one particular hour a year ago. If it's not obvious, gatekeepers should ascertain whether a dog and person are a service dog team based on answers to limited questions, like "Is that a service dog for your disability?" and "What work or tasks has the dog been trained to do to help with your disability?".

That is how access generally works in the US. No system will ever be perfect in practice, but this one was at least developed based on disability rights.

On the second hand, we have an experience- and evidence-based fear about *any* attempt to create an ISO assistance dog standard. Our pressing concern is that many participants would either not restrict the standard to these topics, or they would pervert these topics in ways that de-center disability rights. When this happens, bazaar-style negotiations tend to occur. The product of this kind of process gives equal weight to the interests of justice and the interests of other desires, which means justice is diluted to disappearance.

One example-cluster that's hard to avoid involves certification, registration, and ID cards or other documentation, all of which the proposal author explicitly plans for the standard to have (see "Work Item 7" on page 4). If there had to be an ISO standard, it should definitely not include these.

Certification can only be based on an arbitrary standard that leaves people behind who weren't in mind during its development or can't financially or physically access the standard bearers (as detailed above). Registries of disabled people have a checkered past and worrisome prospects for their operation and engagement.

Documentation or ID cards are not a guarantee of good behavior, but business employees actually treat them as free passes to misbehave. This shows that while implementing the US's question-based access requires

education, having ID cards would in no way remove that need.

But there's something even more important than the troubling "free pass" mindset associated with ID cards.

It is unethical to require people with disabilities to show third-party documentation to access spaces others can access without being challenged. We all need to move beyond the thinking that disabled people should have an outsider's or caretaker's stamp of approval to be in public.

The default assumption must be that disabled adults are actually people, capable of responsibly directing their lives. When it comes to the right to travel as a disabled person, the priority must lie with equal access, not with greater barriers.

It can be difficult to be inclusive if we adopt an impositional, other-policing attitude. If there had to be an ISO standard on assistance dogs, it should not ignore similar means of disability mitigation like service miniature horses. For religious reasons, allergy considerations, sturdiness, and due to their long lives, they make the best (and sometimes only!) choice as a service animal for some people. Their users are granted access rights under the main service animal regulations in the US.

We've articulated what we believe are overwhelming difficulties that would encumber and prevent a successful ISO standard creation for assistance dogs. ISO and its member organizations are just not the right place for a standard that so forcefully impacts disability rights—and looks like it would be set to limit them.

The proposal's author mentions the Convention on the Rights of Persons with Disabilities of the United Nations (UN CRPD). This is the proper sort of venue for the much more scaled-back approach to a standard we could appreciate. The United Nations and governments should be responsible for codifying disability rights with broad strokes that protect the marginalized, rather than letting ISO participants overpaint those rights with so many of the tiny, slicing strokes of the controlling majority's detailed preference.

Earnestly,
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