



## **United Service Animal Users, Supporters, and Advocates**

*Partnering for reasoned advocacy*

[psych.dog/usausa](http://psych.dog/usausa)

Steven Cornish  
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RE: ISO TS/P 295, Assistance Dog standard proposal

February 25, 2021

Mr. Cornish:

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"). We oppose the proposal because what it seeks would predictably harm people with disabilities by: (1) decreasing the supply of program service dogs, (2) effectively eliminating owner-trained service dogs, (3) creating an access system that violates human rights and undermines its own purpose, and (4) excluding service miniature horses.

There are already voluntary industry standards for service dog programs under both the International Guide Dog Federation (IGDF) and Assistance Dogs International (ADI). There are good reasons for some programs to spend the time and money and choose to become accredited by these organizations (and to be bound by their standards). Consistency and client assurance have their value.

There are also good reasons for many other service dog providers not to use their limited resources to seek outside approval. Several providers are not the right size or structure to match IGDF/ADI standards. Some are unable or unwilling to devote their resources to support IGDF or ADI. Many feel that

being bound by IGDF or ADI standards would prevent them from innovating better methods or from helping their disabled clients in specialized ways unfathomed by IGDF and ADI.

The Netherlands ISO proposal indicates on page 9 that a major point of creating an ISO standard is to try to force non-IGDF/ADI programs to comply with the kind of standards IGDF and ADI prefer. This would shut down many of the providers that decided their clients were not best served by IGDF or ADI accreditation.

The demand for service dogs far outstrips the supply. There are already years-long waitlists and price tags of around \$30,000 for service dogs from programs. If the point of service dogs is to help disabled individuals, it is inconceivable for the supply to be cut even more.

Further, it is unthinkable that the tens of thousands of service dog users in the US who are owner-trainers should be expected to be certified by an ADI program. 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. This is asking a lot of anyone, but disabled people are even less likely on average to have the sort of wealth or wherewithal that this requires.

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. As the proposal notes on page 9, this is often very successful. Yet the proposal seeks to restrict owner-trainers to those that can be certified under an IGDF/ADI standard. This does not merely sidestep the autonomy of disabled people. It would effectively end owner-trained service dog use and devastate the ability of so many disabled individuals to weave themselves into the social fabric like everyone else.

On page 4 of the proposal, Work Item 7 indicates a plan to force service dog users to be *certified* according to an IGDF/ADI standard, *register* themselves with a central registry, and to use a special *ID card* to gain access to places others can go without one. This is abhorrent to those who advocate for disability rights.

As detailed above, forcing certification using an IGDF/ADI standard would leave so many behind. There is a checkered past of registries of marginalized people—especially those with disabilities—and we must not regress to that past. Having and requiring special ID cards for access is a clear infringement on the human right to travel, but business employees also tend to interpret them as free passes for dog misbehavior. If the goal is to ensure good behavior, they can have the opposite effect.

The ISO proposal on assistance dogs ignores 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 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 and self determination, not with greater barriers to community integration.

The ISO proposal indicates an ISO assistance dog standard would try to engineer service dogs from the perspective and for the benefit of accrediting agencies. Since this proposal and any ensuing process seems incapable of or at least unlikely to center disability rights, we object to the creation of an ISO assistance dog standard.

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