

## **DRAFT ANSI POSITION AND COMMENTS ISO TSP 295 (ASSISTANCE DOGS)**

ANSI votes DISAPPROVAL on ISO TSP 295, the proposal to form a new ISO technical committee on Assistance Dogs with the following comments:

- The proposal implies or implicitly eliminates consideration of private and owner-trained assistance dogs. We cannot lose sight of the wide variety of assistance dogs and their individual training, be it through an assistance dog training organization or an individual training a dog to their needs. Many people with disabilities hire private trainers or train their own potential assistance dog to meet their individual needs. These are successful assistance dog teams, even though their path towards training did not include an agency or formal certification.
- In the United States and other countries, the rights of disabled persons, including in relation to assistance goods, is strongly protected by national laws and regulations. Any ISO standard cannot take precedence over national laws and regulations in this field.
- There are national and international standards related to assistance dogs, and any effort to develop ISO standards should not result in consensus on lowest common denominator standards that provide lesser rigor in this field. Lower standards will have a negative impact on assistance dog clients and dog welfare. Furthermore, many disabled persons cannot afford or wait for assignment of an animal from one of these programs.
- Any ISO standards effort in this field should be focused primarily on the rights of those with disabilities rather than exclusively on the quality of the dogs or on the avoidance of fraud or on the business interests of the assistance dog formal programs and certification.
- Any potential standards must have a thorough understanding of the range of disabilities and the needs of the person with a disability who opts to partner with an assistance dog. The proposal fails to recognize that vital importance of pairing and training assistance dogs, again implying the elimination of self-training.
- The proposal seeks to narrow the scope of disabilities being considered, limit the variety of potential dog breeds suitable for providing assistance, and limit areas of access for disabled persons. The ISO activity should not limit the range of disabilities that may benefit from assistance dogs. A dogs' breed should not exclusively eliminate a dog from being considered an assistance dog. We know of many rescue dogs of various and mixed breeds that are partnered with people with disabilities and form successful assistance dog teams. The ISO activity should also not seek to limit the areas of access for a successful assistance dog team. Any ISO activity that limits the rights and access of disabled persons will have a very negative impact on those persons and on ISO's reputation.
- The ISO activity should expand its consideration beyond the breeding, rearing and training of puppies and include consideration of adult and rescue dogs which are engaged in many successful assistance dog teams. The quality of the dog and its training should be the focus rather than the original of the dog.
- The ISO activity should also consider other animals that can serve in these roles assisting persons with disabilities, especially miniature horses, which may be favored in some cases due to religious beliefs, allergies to dogs, their sturdiness and their longevity.

- Any requirement that seeks a “one-size-fits-all” solution regardless of the disabled individual’s specific and unique needs and their assistance dog’s individual training is inappropriate. Each case of human/dog partnership is unique.
- We object to the implied forced certification without specific plans for mitigating costs for disabled persons (such programs and certification are not affordable for many disabled persons) or specific plans for training individuals who could be eligible to certify but are not from a limited number of agencies. ANSI believes that universal certification is not practicable. There are few public certification trainers and testers available. Many persons with disabilities cannot afford a trainer or tester or may not be able to physically travel to one. It is our position that socioeconomic factors, barriers due to disability, and chosen training methodology, i.e., private or owner training, should never be a factor in recognizing a true assistance dog team.
- We must also recognize that the training and relationship of a dog and its human partner is a continuum that develops over time, including after the point at which a certification may be granted. Certification is only a snapshot of the dog’s behavior at one point in time which may further develop after that point.
- An ISO standard that only supports formal certification activities would be contrary to the ISO Neutrality Policy, which states that an ISO standard cannot drive only one form of conformity assessment. Any ISO standard in this field must support formal certification programs AND individual owner/trainer assertions of conformance with the standard.
- An ISO standards development committee in this field must engage not only the formal programs, existing organizations and certifiers, but it must also engage disabled persons and private owners/trainers of assistance dogs.
- If this ISO committee is formed, please register ANSI ([isot@ansi.org](mailto:isot@ansi.org)) as an observer (O) member so that ANSI may monitor this activity until such time that ANSI may form a national mirror committee and request participating (P) membership.