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Re: Service dogs in training; HB 4256 and any related bill(s)

Michigan legislators:

Psychiatric Service Dog Partners is a US-based international nonprofit organization that educates, advocates, and provides support for disabled people with psychiatric service dogs. We have provided guidance at the federal level, working with the Department of Transportation on their new flying laws, consulting for the Department of Justice on court cases, and filing amicus briefs with SCOTUS.

We are writing in regard to HB 4256 and any related bill.

It is an excellent idea to provide access for service dogs in training. However, the language of HB 4256, requiring the handlers to be affiliated with ADI (Assistance Dogs International) or IGDF (International Guide Dog Federation), will exclude the majority of service dogs in training in your state. ADI- and IGDF-accredited businesses train only a small number of dogs compared to the total service dogs trained in the US every year. Many private trainers and service dog programs cannot afford to pay the fees required for ADI accreditation (intended for larger businesses), or they do not agree with their limiting policies.

Additionally, tens of thousands of people train their own service dogs. Most disability rights laws in the US aspire to treat disabled people as fellow human beings, fully capable of training our own service dogs. The proof is in the many disabled people who have successfully done so, as recognized by the Department of Justice in their guidance on updating the Americans with Disabilities Act over a decade ago.

Failing to include disabled owner-trainers in this legislation is a failure to create a civil rights bill.

Instead, HB 4256 would be merely a bill to give lopsided power to those who already have the greatest power in an industry, rather than empowering disabled people to help themselves (often with the assistance of professionals).

The way HB 4256 is currently written, private trainers, schools not associated with ADI or IGDF, and owner-trainers will be excluded. **If the point is to help disabled people, we're sad to say the bill lost the plot.** It prioritizes certain businesses at our expense.

Please amend the language to cover access for service dogs in training accompanied by any person involved in their training. **As a civil rights law, this should not include any documentation requirements, since these historically cause more harm than good.**



Store employees treat documentation as a free pass to misbehave, while fraudsters are happy to create their own and owner-trainers do not have any. Setting up state agencies to issue documentation ends up doing nothing but create barriers for disabled people and government waste. **Access and continued access must be based on the behavior of the animal at the time, not on a distracting document or ID.**

If you would like to discuss this further, please don't hesitate to contact us at info@psych.dog and/or 805-876-4256.

Thank you,

Veronica Morris

Bradley W. Morris

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