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Board of Directors *Meeting Minutes*

January 5, 2024

Attendees: Veronica, Brad, Linden, Heather, Elaine, and Katie

This regular meeting was called by verbal agreement during the prior meeting, or by intermediate written reasonable notification made in good faith and agreed to by a majority of board members through email or phone, and was held through videoconferencing.

Agenda

- Next regular meeting
- Site additions
- Air travel practicalities
- Section 504 NPRM
- Rail relief areas
- Peer convention
- Community photos

• **Next regular meeting**

Friday, March 8th at 1:00 PT/3:00 CT/4:00 ET.

Board social: February 9th at 1:00 PT/3:00 CT/4:00 ET.

• **Site additions** (no update)

Veronica drafted an article tentatively titled “My future service dog: what should I train first, and next?”. (no update)

Brad is working on Emily’s Chinese translation for our general flyer. (no update)

• **Air travel practicalities**

DOT is renewing their OMB status on the service animal flying form (required for it to have legal effect), and they’ve slightly updated the form to clarify that owner-training is fine. They plan to handle more substantive issues in the future, partly through their ACAA advisory committee. We’ll have to ensure we have their ear before they draft an NPRM in this arena.

From earlier: Brad and Veronica have been meeting with fellow advocates and DOT officials, and are working toward solutions for the documentation issues that are harming service dog community members.

In an upcoming advocate meeting with DOT, Veronica and Brad will be discussing with DOT whether it is appropriate under the regulations for Open Doors to have an initial work/task screening question in their handling of service dog documentation for some airlines.

DOT has clearly said that airlines aren't permitted to require documentation beyond DOT's (see the email excerpt below from May 10, 2023). However, some airlines direct passengers to Open Doors' system, which has the extra screening question beyond DOT's form. There hasn't been a clear indication this process is optional. What's more, it would be an outlier to try to avoid the Open Doors system and submit DOT's form to the airline, which in practice tends to make such an attempt difficult and burdensome when airline employees aren't accustomed to (or accepting of) handling the passenger's service animal paperwork themselves. The renders the Open Doors' system—with its extra screening question—as a practical requirement, in violation of the regulations. As an extra consideration, Open Doors people are not actually service dog experts, which makes their judgments on their extra question suspect. Their denial might impact a passenger's ability to fly with any of the often limited airlines available from their particular locale.

This is also an issue for the "Service Dog Pass", which may result in harassment of those who don't have it.

The DOT's service animal rule does not permit airlines to require documentation from passengers beyond the DOT forms, the rule also does not prohibit airlines from asking passengers to "voluntarily" complete other documentation, which would include the service dog pass. Please understand that this statement is based strictly on the language in DOT's service animal rule, 14 CFR Part 382, Subpart E, and is not the result of any approval or endorsement from DOT of the service dog pass, or any other documentation outside of the DOT forms. We can discuss this in more detail at the next advocacy meeting.

From earlier: Open Doors Organization is handling the service animal documentation for multiple airlines, including JetBlue, Alaska, and Allegiant. We are not quite on the same page about how this should be done, but we were able to do an invited training for their staff and leadership. We made significant inroads toward ensuring they handle the documentation in appropriate ways, and we will keep communicating with each other.

• **Section 504 NPRM**

We supported the Department of Health and Human Services' plan to issue regulations explicitly aligning Section 504 of the Rehabilitation Act with DOJ's ADA regulations. This will mean that service animal rules for federally funded facilities will be practically stronger by being more readily found and explicit than they have been in case law.

<https://www.psychdogpartners.org/board-of-directors/board-activities/advocacy>

• **Rail relief areas**

DOT provided an opportunity for us to ask again for rail relief areas, so we did, asking our community to join in again. Today (January 5th) is the deadline.

<https://www.psychdogpartners.org/board-of-directors/board-activities/advocacy/rail-relief-areas-part-2>

• **Peer convention**



Our 2024 peer convention will be at the Hilton Garden Inn in Rock Hill, South Carolina, April 26–29.

The draft info packet is posted (no changes expected, except for sponsors). The discounted registration period has passed, as has the scholarship deadline. The scholarship offers have gone out.

<https://www.psychdogpartners.org/resources/convention/2024-convention>

- **Community photos**

We extended the deadline for 2023 community photos till January 5th (today).

<https://www.psychdogpartners.org/resources/community-photos/guidelines>
