

Right to Emotional Support Animals in "No Pet" Housing

Advocates and professionals have long recognized the benefits of assistive animals for people with physical disabilities, including seeing eye dogs or hearing dogs that are trained to perform simple tasks such as carrying notes and alerting their owners to oncoming traffic or other environmental hazards. Recent research suggests that people with psychiatric disabilities can also benefit significantly from assistive animals. Emotional support animals provide therapeutic nurturing and support and have proven extremely effective at ameliorating the symptoms of psychiatric disabilities, including depression, anxiety, and post-traumatic stress disorder.

I have a psychiatric disability and may benefit from an emotional support animal. What laws protect my right to keep an animal as an assistive aid?

The Fair Housing Amendments Act of 1988 (FHA) and Section 504 of the Rehabilitation Act of 1973 (§ 504) protect the right of people with disabilities to keep emotional support animals, even when a landlord's policy explicitly prohibits pets.¹ Because emotional support and service animals are not considered "pets," but rather assistive aids, the law will generally require the landlord to make an exception to its "no pet" policy so that a tenant with a disability can fully use and enjoy his or her dwelling. In most housing complexes, so long as the tenant meets the definition of a person with a disability and has a letter or prescription from an appropriate professional, such as a therapist or physician, he or she is entitled to a reasonable accommodation to a building's "no pet" policy allowing an emotional support animal in the home.

What makes an accommodation "reasonable"?

Discrimination under the FHA includes "a refusal to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford [a person with a disability] an equal opportunity to use and enjoy a dwelling." 42 U.S.C. § 3604(f)(3)(B). So long as the requested accommodation does not constitute an undue financial or administrative burden for the landlord, or fundamentally alter the nature of the housing, the landlord must provide the accommodation. The Department of Housing and Urban Development (HUD) and several courts have explicitly stated that an exception to a "no pets" policy for a support animal generally qualifies as a reasonable accommodation.

See, e.g., Castellano v. Access Premier Realty, Inc., 181 F. Supp. 3d 798 (E.D. Cal. 2016) (waiving a "no pet" policy to allow a resident's emotional support cat was a reasonable accommodation under FHA); *Auburn Woods I Homeowners Ass'n v. Fair Emp't and Hous. Comm'n*, 121 Cal. App. 4th 1578 (2004) (landlord's repeated denials of tenant's requests for a waiver allowing an emotional service dog constituted unlawful discrimination); *Occupancy Requirements of Subsidized Multifamily Housing Programs*, HUD, No. 4350.3, exhibit 2-2 (2013)² (making an exception to a no pet rule to allow a tenant with an emotional disability to keep an assistance animal is a reasonable accommodation).

¹ Although Titles II and III of the Americans with Disabilities Act (ADA) apply to public entities that provide housing, and public accommodations involved in the provision of housing, respectively, 2010 Department of Justice (DOJ) regulations exclude emotional support animals from the definition of service animals for the purposes of the ADA. Only trained dogs who do work or perform tasks other than emotional support, companionship, etc., are covered. See 28 C.F.R. §§ 35.104, 36.104.

² https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_35662.pdf

Depending upon the type of housing in which the tenant resides, his or her right to an emotional support animal as a reasonable accommodation will be grounded in one or both of the following statutes:

| Statute | Covered Housing | Elements of Reasonable Accommodation Claim |
|---|---|---|
| <p>Fair Housing Act</p> <p>42 U.S.C. §§ 3601 et seq.</p> | <p>Applies to virtually all forms of housing, whether for sale or rent. The exceptions include (a) buildings with four or fewer units where the landlord lives in one of the units, and (b) private owners who do not own more than three single-family houses, do not use real estate brokers or agents, and do not use discriminatory advertisements.</p> | <ul style="list-style-type: none"> (1) Tenant has a disability; (2) Landlord/Housing Authority knows about disability; (3) Reasonable accommodation may be necessary to afford tenant an equal opportunity to use and enjoy his or her dwelling; and (4) Reasonable accommodation would not constitute an undue burden or fundamental alteration. |
| <p>Rehabilitation Act</p> <p>29 U.S.C. § 794</p> | <p>Applies to any program that receives federal assistance, such as public or subsidized housing (although a landlord who only accepts Section 8 rental assistance is not subject to § 504).</p> | <ul style="list-style-type: none"> (1) Tenant has a disability; (2) Tenant was excluded from and denied participation in services, programs, and activities; (3) Exclusion was because of disability; and (4) Reasonable accommodation would not constitute an undue burden or fundamental alteration. |

Do I qualify for a reasonable accommodation?

To qualify for a reasonable accommodation under the FHA or § 504, the tenant must meet the statutory definition of having a disability. The statutes recognize three broad categories of disabilities: (1) a physical or mental impairment that substantially limits one or more major life activities (such as walking, seeing, working, learning, washing, dressing, etc.); (2) a record of having such an impairment; or (3) being regarded as having such an impairment. 28 C.F.R. § 35.108.

My landlord has a "no pet" rule. How do I request an exception to the policy for my support animal?

If you need an emotional support animal to ease the symptoms of a disability (as defined above), you should request an accommodation, in writing, from the landlord, manager or other appropriate authority. The request should state that you have a disability and explain how the requested accommodation will help enhance your ability to enjoy your home and lessen the effects of the disability. In addition, the request should include a note from a service provider, doctor, or therapist verifying the need for the support animal (see sample letter from service provider on p. 6). Note that you are not obligated to disclose the details of your disability, nor provide a detailed medical history.

What if my landlord asks for proof of my disability?

HUD and DOJ indicated in a Joint Statement on Reasonable Accommodations under the FHA that the housing provider is entitled to obtain only that information necessary to determine whether the requested accommodation is necessary because of a disability.³ Being able to substantiate your disability and establish that the support animal is necessary to use and enjoy the residence is still critical.

As a result, courts have consistently held that a tenant requesting an emotional support animal as a reasonable accommodation must demonstrate a relationship between his or her disability and the companionship of the animal. In most cases, a letter from your doctor or therapist explaining the need for your support animal is sufficient. *See, e.g., Castellano v. Project Sentinel, Inc.*, 181 F. Supp. 3d 798 (E.D. Cal. 2016) (sufficient support existed for waiving a no pet policy where a tenant's treating physician provided managers with documentation indicating that tenant suffered from anxiety disorder and depression that would be eased by an emotional support animal).

Does the animal need to have special training?

Although the landlord is entitled to the supporting materials that document the need for an emotional support animal, neither FHA nor § 504 require the tenant to provide proof of training or certification of the animal. Courts, however, remain divided on the issue. *See, e.g., Fair Hous. of the Dakotas, Inc. v. Goldmark Prop. Mgmt.*, 778 F. Supp. 2d 1028 (D. N.D. 2011) (the FHA encompasses all types of animals regardless of training); *Prindable v. Ass'n of Apartment Owners of 2987 Kalakaua*, 304 F. Supp. 2d 1245 (D. Haw. 2003) (a dog not specially trained is not a "service animal" within the meaning of the FHA).

In addition, while dogs are the most common service animal, other animals may also be assistance animals under FHA and § 504. *See Janush v. Charities Hous. Dev't Corp.*, 169 F. Supp. 2d 1133 (N.D. Cal. 2000) (disabled tenant's need for two birds and two cats to act as service animals, providing tenant with companionship necessary to her mental health, supported her claim that landlord's eviction of tenant for violation of no pets policy violated FHA).

³ <https://portal.hud.gov/hudportal/documents/huddoc?id=43503HSGH.pdf>.

Could my landlord deny my request for a support animal?

A landlord is entitled to consider the administrative, financial, or programmatic repercussions of allowing an animal onto the premises, including the potential disturbance to other tenants. Typically, a landlord will have a difficult time establishing that an emotional support animal constitutes a fundamental alteration or undue burden. See *Warren v. Delvista Towers Condo. Ass'n*, 49 F. Supp. 3d 1082 (S.D. Fla. 2014) (waiving a no pet policy did not impose any undue burden on housing association nor fundamentally alter nature of its operations); *Tamara v. El Camino Hospital*, 964 F. Supp. 2d 1077 (N.D. Cal. 2013) (hospital failed to show that allowing service dogs in psychiatric ward would fundamentally alter nature of facility).

If the emotional assistance animal is particularly disruptive, or the tenant fails to take proper measures to ensure that the animal does not bother other tenants, however, the landlord may be justified in denying the accommodation or ultimately filing for an eviction. See, e.g., *Woodside Village v. Hertzmark*, 1993 WL 268293 (Conn. June 22, 1993) (finding that a federally assisted housing complex did not violate the FHA by evicting a resident with mental illness for failing to walk his dog in designated areas and properly dispose of animal waste).

Could my landlord propose an alternate accommodation?

If the requested accommodation is unreasonable, the landlord may propose a substitute accommodation. In so doing, the landlord should give primary consideration to the accommodation requested by the tenant. According to the DOJ's ADA Technical Assistance Manual, II-7.1100:

It is important to consult with the individual to determine the most appropriate auxiliary aid or service, because the individual with a disability is most familiar with his or her disability and is in the best position to determine what type of aid or service will be effective.⁴

Although the ADA no longer covers emotional support animals, this view has been endorsed by a number of courts within the context of other reasonable accommodation claims under the FHA, ADA and § 504. See, e.g., *Sabal Palms Condos. of Pine Island Ridge Ass'n v. Fischer*, 6 F. Supp. 3d 1272 (S.D. Fla. 2014). There, the court found an alternate accommodation unreasonable where a housing provider proposed that a dog under 20 pounds would be equally effective in meeting tenant's disability-related needs as a dog over 20 pounds. Because the tenant required a dog of comparable height to her wheelchair and relied on the dog for significant assistance, the landlord's proposed alternate accommodation was not reasonable.

Similarly, in the event that a landlord suggests an alternate accommodation, a tenant can reject it if he or she feels it is inadequate. In *Green v. Housing Authority of Clackamas County*, 994 F. Supp. 1253 (D. Or. 1998), the federal district court of Oregon rejected a defendant housing authority's proposed substitute accommodation of a flashing smoke alarm and doorbell for a hearing assistance dog. There, the court found that the dog could alert the tenant to phone calls, cars in the driveway, visitors, and smoke alarms, no matter where he was in the house, and that the strobe lights were less effective in ameliorating the effects of the tenant's hearing impairment. Thus, the tenant was not obligated to accept the proposed accommodation.

⁴ <https://www.ada.gov/taman2.html#II-7.1100>.

My landlord will allow an emotional support animal, but wants to charge an excessive deposit. Do I have to pay?

Generally, a landlord is entitled to charge a deposit for a pet to cover any resulting damage to the property. But, if a pet is more properly characterized as a service animal, the tenant should be exempt from the deposit. According to HUD's handbook for subsidized multifamily programs:

A housing provider may not require an applicant or tenant to pay a fee or a security deposit as a condition of allowing the applicant or tenant to keep the assistance animal.

Occupancy Requirements of Subsidized Multifamily Housing Programs, HUD, No. 4350.3, 2-44(E) (2013).⁵ If the assistance animal causes damage to the housing unit or the common areas of the dwelling, however, the housing provider may charge the cost of repairing the damage.

Additionally, while HUD and DOJ have stated that requiring pet deposits for assistance animals is discriminatory, courts have been hesitant to find that imposing such fees is per se unreasonable. *Compare* Joint Statement of the Dept. of Housing and Urban Dev. and the Dept. of Justice, "Reasonable Accommodations under the Fair Housing Act," at 9 (May 17, 2004)⁶ ("The housing provider may not require the applicant to pay a fee or a security deposit as a condition of allowing the applicant to keep the assistance animal"); *with* U.S. v. Barber, 2014 WL 4988200 (W.D. Wash. Oct. 7, 2014) (noting that, while numerous cases resulted in settlement decrees requiring waiving a pet deposit for service animals, settlement decrees do not establish rules of law, and thus declining to decide the matter).

I live in campus residential housing. Do these laws apply to me?

HUD has interpreted the FHA to cover residence halls and dormitory rooms, and district courts have typically sided with this position. For example, in *U.S. v. Nebraska at Kearney*, 940 F. Supp. 2d 974 (D. Nebr. 2013), the court found that a university's student housing is a "dwelling" within the meaning of the FHA and thus is subject to the same legal requirements as other covered housing. In that case, the court held that the university violated the FHA by denying a student tenant's requests to live with her emotional support dog in a student housing facility based on university's no pets policy.

HUD's guidance states that housing providers should use general reasonable accommodation principles in evaluating requests to bring assistance animals into covered housing. Thus, colleges and universities may request information regarding a student's disability and disability-related need for the animal, including supporting documentation. The educational institution must conduct an individualized inquiry when deciding whether an accommodation is reasonable and may not rely on long-standing policies to deny a student's request for accommodation. *See, eg., Fialka-Feldman v. Oakland Univ. Bd. of Trustees*, 678 F. Supp. 2d 576 (E.D. Mich. 2009).

⁵ <https://portal.hud.gov/hudportal/documents/huddoc?id=43503HSGH.pdf>.

⁶ <https://www.justice.gov/crt/us-department-housing-and-urban-development>.

Sample Letter from a Service Provider

[date]

Name of Professional (therapist, physician, psychiatrist, rehabilitation counselor)
XXX Road
City, State Zip

Dear [Housing Authority/Landlord]:

[Full Name of Tenant] is my patient, and has been under my care since [date]. I am intimately familiar with his/her history and with the functional limitations imposed by his/her disability. He/She meets the definition of disability under the Americans with Disabilities Act, the Fair Housing Act, and the Rehabilitation Act of 1973.

Due to mental illness, [first name] has certain limitations regarding [social interaction/coping with stress/anxiety, etc.]. In order to help alleviate these difficulties, and to enhance his/her ability to live independently and to fully use and enjoy the dwelling unit you own and/or administer, I am prescribing an emotional support animal that will assist [first name] in coping with his/her disability.

I am familiar with the voluminous professional literature concerning the therapeutic benefits of assistance animals for people with disabilities such as that experienced by [first name]. Upon request, I will share citations to relevant studies, and would be happy to answer other questions you may have concerning my recommendation that [Full Name of Tenant] have an emotional support animal. Should you have additional questions, please do not hesitate to contact me.

Sincerely,

Name of Professional

Resources

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