



## **CU Boulder Procedures for Service Dogs in a Laboratory**

### **A. Application**

The University of Colorado Boulder has established university guidance regarding service animals, and this information<sup>1</sup> is available online. As set forth in these materials, a service animal is permitted to accompany people with disabilities who are otherwise qualified to access campus spaces, including laboratories to the extent consistent with the below, so long as such access can be achieved safely. Laboratories are unique spaces that often contain hazards necessitating specific precautions and equipment in order for those authorized to safely and successfully utilize the space.

This CU Boulder Procedures for Service Dogs in a Laboratory (the “Procedures”) applies to service dogs, and service-dogs-in-training, in University of Colorado Boulder laboratories. A service<sup>2</sup> dog is defined by the Americans with Disabilities Act (ADA) as a dog that has been individually trained to do work or perform tasks for an individual with a disability and includes dogs trained to take a specific action, such as dogs trained to alert for low blood sugar in diabetics, those that detect the onset of seizures, and even those that alert the time for medication in depressed individuals. Service-dogs-in-training<sup>3</sup> are not protected by the ADA, however, they are protected under Colorado Revised Statute 24-34-803. A dog being trained to perform as a service dog will be treated as a service dog when accompanied by a trainer and identified as such. Dogs used for emotional support, therapy, comfort, and companions are not considered qualified service dogs.

A service animal is categorized as such because it is tasked with performing services directly related to a person’s disability. If inquiring about a service animal, only two questions may be asked:

- 1) Is this a service animal?; and
- 2) What task has the animal been trained to perform?

These questions may not be asked when it is obvious what service the animal provides.

### **B. Procedures for Departments, Faculty, Supervisors, and Instructors**

1. Prior to permitting a service animal into a laboratory, a department (faculty, supervisor, instructor, director of the labs) may outreach to Disability Services (if the individual utilizing the services of the service animal is a student) or the ADA Compliance unit (if the individual utilizing the services of the service animal is an employee or visitor of the university) regarding the specific tasks performed by the service animal to ensure those tasks can be safely performed in the laboratory.

2. If there are concerns about the safe performance of a service animal’s task in the laboratory, Disability Services and/or the ADA Coordinator may meet with the Department and EH&S staff to assess and discuss the concerns, generally and ideally within five business days of those

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<sup>1</sup> Such information and requirements are set forth in the Campus Use of University Facilities (“CUUF”) Policy and on the websites of Disability Services and the ADA unit of the OIEC, available at: <https://www.colorado.edu/disabilityservices/faculty-staff/working-disability-services-students/providing-accomodations/service-animals> and <https://www.colorado.edu/oiec/ada-accessibility/access-accessibility/service-assistance-animals>.

<sup>2</sup> Miniature horses or other types of service animals are not allowed in university laboratories.

<sup>3</sup> For purposes of this document, the term service dog is intended to include service dogs-in-training.



concerns being raised. The Department representatives will be the instructor of record for the lab course, the lab coordinator for the course, and the director of the labs (when there is one). Disability Services and/or the ADA unit, in coordination with EH&S, will endeavor to conclude its final assessment of the safety of the specific service animal in the laboratory within five business days from the initial group meeting.

3. Once a determination has been made that the service animal may safely perform its task in the laboratory, service dogs can only be excluded from the laboratory if:

- a. the dog is out of control or disruptive and the individual utilizing the services of the service animal fails to take effective action to control it;
- b. the dog is not housebroken; or
- c. the dog will not or cannot wear the required personal protective equipment (PPE), or the dog's PPE is compromised.

A service dog may be immediately excluded from the lab in these instances, however, if it is a student, they will be permitted to make-up the lab according to the established make-up lab schedule for that term.

4. The Department member onsite in the laboratory, which may include a faculty member, instructor, staff member, or TA, is authorized to make an initial assessment that a dog is out of control. Being out of control may include, but is not limited to, barking or jumping in a manner unrelated to the task the animal performs; an inability to remain on a mat when ordered to; growling or other threatening behaviors aimed at others in the laboratory; behavior not focused on the owner that distracts others present in the lab. If a Department member makes the assessment that the animal is out of control or engaging in inappropriate behavior, they must report the exclusion of the service animal within 24 hours to the Disability Services office and/or the ADA unit. If the service dog displays behaviors that are out of control, the dog will not be permitted in the laboratory until documented and demonstrated re-training has occurred.

Upon report of exclusion, or out of control/inappropriate behavior by a service dog in a laboratory, to their office, Disability Services and/or the ADA unit will endeavor to meet with the student/employee within five calendar days of the exclusion to assess: whether the exclusion will be lifted, whether an alternative accommodation will be put in place, or whether any other action is needed.

5. Faculty and Staff are not allowed to request any medical documentation for the dog, require that the dog demonstrate its task, or inquire about the nature of the person's disability.

6. Service dogs will not be allowed into the laboratory without the appropriate personal protective equipment (PPE). The specific PPE items for each lab will be identified by the Director of Labs in coordination with the lab coordinators and EH&S.



### **C. Procedures for Owner of Service Dog**

1. Owners are responsible for ensuring that any service dog entering a laboratory is protected to prevent exposure to hazardous chemicals, broken glass or other health or safety concerns that might be present in the laboratory environment.

2. Owners are responsible for purchasing the appropriate PPE for the service dog and ensuring the PPE is worn by the service dog at all times within the laboratory. PPE may include the following:

- Disposable or reusable boots to cover the feet such as commercially available products (Pawz Rubber Dog Boots)
- Disposable lab coats such as Maytex lab coat
- Dog safety goggles
- Disposable plastic-backed absorbent lab paper or pet pads for the dog to lie on during lab to protect them from whatever might be on the floor

If appropriate PPE is not brought to the lab or if the dog will not remain fully attired for the duration of the lab period, then the service dog will not be permitted into the laboratory. EH&S is the university resource to determine efficacy of selected PPE.

3. Owners are solely responsible for dressing their service dog with the appropriate PPE; removing these garments; and ensuring these garments are kept clean from contaminants.

4. In the event PPE is damaged, the owner is responsible for notifying the department member on site. If the department member deems that the compromised PPE will not sufficiently protect the animal, the owner and dog must leave the lab immediately and either remedy the situation before being allowed to return or make arrangements for a makeup lab. The student is responsible for ordering any necessary PPE for the animal.

5. In the event of a contamination of the animal's PPE, the owner is responsible for cleaning the PPE in a manner in accordance with laboratory procedures.

6. In the event the animal comes into direct contact with a contaminant, the owner is responsible for ensuring the animal is safely decontaminated and that any necessary follow-up veterinary care occurs. The owner must notify the Department member on site of the contamination.

### **D. Laboratory Hazards**

#### **1. Biological Materials**

- a. An assessment must be completed by EH&S prior to the admittance of a service dog in a laboratory utilizing any biological material.



- b. Service dogs are generally not permitted in laboratories utilizing unsealed radioactive sources or any biological agents. In contrast, sealed sources (such as irradiators and x-ray machines) pose no risk of contamination and subsequent spread of contamination. Nonetheless, all proper precautions for the individual equipment must still be followed.

## 2. Radioactive Materials

- a. Service dogs are not permitted in laboratories in which radioactive materials are used.

## E. Assessing Service Animal Safety within Laboratories

### 1. Location of Service Animal During Lab

- a. In assessing where the animal will be located in the laboratory, Disability Services and/or the ADA Compliance unit may meet with the Department and EH&S staff to consider alternatives to positioning the service dog in the lab next to the individual, provided this consideration has been discussed with the handler first.
  - i. Alternatives may include: Placing the dog behind a removable gate or in a pen in an adjacent room or on a mat in an area away from hazards. In this situation, the student is responsible for acquiring these items, setting them up before the lab, and properly storing them following the lab.
- b. If a location next to the person is required, the university will first consider a location at the end of a table, or in a corner space away from other students, personnel, and activities.

### 2. Animal Items

- a. A dog bed or fabric pad is not appropriate for use in the lab. Instead, if the animal will be utilizing a mat, the mat should be made out of a chemical resistant material.
- b. Service dogs must wear appropriate PPE to be permitted into the laboratory.
- c. Animal toys, food, treats, and water bowls may not be brought into a laboratory.

### 3. Behavior Expectations of Service Dogs

- a. For a service dog to be present in the lab, the dog must be trained to “stay” and “leave it” (or equivalent behavior).
- b. The dog must not vocalize, bark, or growl inappropriately.



- c. If the dog is trained to alert by vocalizing, the instructor or staff must be aware of the circumstances under which the dog would vocalize. Disruptive, extended vocalizing or barking will not be permitted, unless in proper context.
  - d. Aggressive behavior by the dog is not permitted - snapping, snarling, growling, charging, swiping, etc.
  - e. The dog must not jump up on other people. The dog must not engage with other students in **any manner** such as sniffing, nudging for attention, licking hands, etc. The dog, if working in a service capacity, cannot be “friendly” with anyone in the room.
4. Interactions with the Service Dog
- a. Disability Services and/or the ADA unit will determine the proper method of informing individuals in the laboratory (email, announcement, syllabus statement) that a service dog is in the laboratory and is always working. If there are issues with a fellow student’s interaction with a service animal, this interaction should be reported to Disability Services and/or the ADA unit.
  - b. Interaction with the dog is by permission of the owner and only permitted outside of the laboratory.

#### **Contact Information**

ADA Compliance and ADA Coordinator  
Office of Institutional Equity and Compliance – ADA Compliance unit  
Phone number: (303) 492-9725  
Email: [adacoordinator@colorado.edu](mailto:adacoordinator@colorado.edu)

Disability Services  
Phone number: 303-492-8671  
Email: [dsinfo@colorado.edu](mailto:dsinfo@colorado.edu)