



Defense Health Agency

ADMINISTRATIVE INSTRUCTION

NUMBER 6025.37
August 22, 2024

DHA, AD-HCA

SUBJECT: Animal Access to Defense Health Agency Administered and Managed Facilities

References: See Enclosure 1.

1. PURPOSE. This Defense Health Agency-Administrative Instruction (DHA-AI), based on the authority of References (a) and (b), and in accordance with the guidance of References (c) through (l), establishes the Defense Health Agency's (DHA) guidance on the development of procedures and local policies for animal access to DHA-administered and managed facilities. This guidance encompasses service animals, DoD-owned animals, and animals used in animal-assisted interventions (AAI) as well as other government-owned animals (GOA) where applicable.

2. APPLICABILITY. This DHA-AI applies to the DHA Enterprise (components and activities under the authority, direction, and control of the DHA) to include assigned, attached, allotted, or detailed personnel and the U.S. Army Veterinary Services.

3. POLICY IMPLEMENTATION. It is DHA's instruction, pursuant to References (d) through (h), that animal access to DHA-administered and managed facilities will be implemented per the procedures outlined in this DHA-AI.

4. CANCELLED DOCUMENTS. This DHA-AI cancels and replaces DHA-Procedural Instruction 6025.18 "Animal Access to Facilities."

5. RESPONSIBILITIES. See Enclosure 2.

August 22, 2024

6. PROCEDURES. Service animals may accompany patients and visitors in DHA-administered and managed facilities as long as such access does not compromise public health and safety. Animals engaging in AAIs may enter DHA-administered and managed facilities only as part of a program approved by the facility director who retains the right to refuse or limit any such program. DoD-owned animals (e.g., Military Working Dogs, animals used in biomedical research, education, training, and testing) will be allowed access to DHA-administered and managed facilities for medical and ancillary services. Other GOAs may be allowed access to DHA-administered and managed facilities for medical and ancillary services as permitted by the DHA Facility Director (see Enclosure 3).

7. PROPONENT AND WAIVERS. The proponent of this publication is the Assistant Director, Healthcare Administration (AD-HCA). When components and activities are unable to comply with this publication the activity may request a waiver that must include a justification, including an analysis of the risk associated with not granting the waiver. The activity director or senior leader will submit the waiver request through their supervisory chain to the AD-HCA to determine if the waiver may be granted by the Director, DHA or their designee.

8. RELEASABILITY. **Cleared for public release.** This DHA-AI is available on the Internet from the Health.mil site at: <https://health.mil/Reference-Center/Policies> and is also available to authorized users from the DHA SharePoint site at: <https://info.health.mil/cos/admin/pubs/SitePages/Home.aspx>.

9. EFFECTIVE DATE. This DHA-AI:

- a. Is effective upon signature.
- b. Will expire 10 years from the date of signature if it has not been reissued or cancelled before this date in accordance with DHA-Procedural Instruction 5025.01 (Reference (c)).

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Enclosures

1. References

- 2. Responsibilities
 - 3. Procedures
- Glossary

ENCLOSURE 1

REFERENCES

- (a) DoD Directive 5136.01, “Assistant Secretary of Defense for Health Affairs (ASD(HA)),” September 30, 2013, as amended
- (b) DoD Directive 5136.13, “Defense Health Agency (DHA),” September 30, 2013, as amended
- (c) DHA-Procedural Instruction 5025.01, “Publication System,” April 1, 2022
- (d) Technical Bulletin Medical 4, “DoD Human-Animal Bond Program Principles and Guidelines,” August 3, 2015¹
- (e) Army Regulation 40-905 / SECNAVINST 6401.1B / AFI 48-131, “Veterinary Health Services,” August 29, 2006
- (f) Public Law 101-336, “The Americans with Disabilities Act of 1990,” amended by Pub Law No 110-325, and codified at 42 U.S.C. Ch. 126 and 47 U.S.C Ch. 5, January 1, 2009
- (g) Public Law 93-112, 87 Stat. 355, “The Rehabilitation Act of 1973,” September 26, 1973
- (h) DoD Instruction 1300.27, “Guidance on the Use of Service Dogs by Service members,” January 7, 2016
- (i) Army Regulation 700-81/AFI 31-126/OPNAVINST 5585.3B/MCO 5585.6, “DoD Military Working Dog (MWD) Program,” 28 February 2017
- (j) DoD 5400.11-R, “Department of Defense Privacy Program,” May 14, 2007
- (k) DoD Manual 6025.18, “Implementation of the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule in DoD Health Care Programs,” March 13, 2019
- (l) 42 U.S. C. Ch 45 - Fair Housing Act

¹ Available at https://armypubs.army.mil/epubs/DR_pubs/DR_a/pdf/web/tbmed4.pdf.

ENCLOSURE 2

RESPONSIBILITIES

1. DIRECTOR, DHA. The Director, DHA, will ensure development, execution, and management of animal access to DHA- administered and managed facilities in accordance with references (f) through (i) and in support of Human Animal Bond programs.

2. DHA FACILITY DIRECTOR. DHA Facility Director will:

a. Ensure that DoD-owned animals will be allowed access to DHA-administered and managed facilities for medical and ancillary services.

b. Ensure installation veterinary services are informed and consulted on all ongoing or proposed human animal bond (HAB) programs at least once per calendar year or upon program changes to include changes in animals and handlers enrolled in the program. Consult with installation veterinary services to ensure health and welfare standards in paragraph 2 of this enclosure are being met.

c. Develop policies and procedures to facilitate access for all beneficiaries, visitors, and employees with service animals. Policies should, at a minimum establish:

(1) Standards for verifying, when appropriate, the status of a potential service animal by asking only two questions: (a) “Is the service animal required because of a disability?” and (b) “What work, or task has the animal been trained to perform?” Any personally identifiable and disability information collected, maintained, and/or stored pursuant to this instruction will be safeguarded in accordance with References (j) and (k), as applicable.

(2) Standards for service animal access, which includes ensuring a service animal can accompany the handler or alternate handler to areas the general public is permitted access, are subject to the same rules as the general public, and where the presence of a service animal would not compromise patient care and safety, or infection prevention and control standards. Restricted areas should include the following:

(a) Operating rooms and surgical suites.

(b) Areas where invasive procedures are being performed.

(c) Acute inpatient hospital settings when the presence of the service animal is not part of a documented treatment plan.

- (d) Decontamination, sterile processing, and sterile storage area.
- (e) Food preparation areas (not to include public food service areas).
- (f) Any areas where personal protective clothing must be worn, or barrier protective measures must be taken to enter.
- (g) Any other area the DHA Facility Director deems necessary to ensure the health, welfare, and safety of patients and staff.

(3) Standards for removal of an animal from a DHA-administered and managed facility are based on the animal's behavior, health, or safety concerns and should address qualifications for the personnel who will make these determinations. Standards will be based on objective indications to determine if an animal poses a health or safety risk. Examples of such indications include aggressive or disruptive behavior, such as running in the facility, excessive barking, jumping on individuals/furniture, inappropriate urinating/defecating in the facility, and signs of disease or poor health.

(4) Procedures to ensure access to care for patients with service animals whose service animal has been removed from the DHA-administered and managed facility.

(5) Procedures for Federal employees who request a reasonable accommodation for a service animal, which can be submitted to the Equal Employment Opportunity Office or Disability Program Manager.

d. Determine the necessary level of support for use of AAI programs within the DHA-administered and managed facility and consult with installation veterinary services to develop procedures prior to implementation. These programs should be reviewed every twelve months, and at a minimum:

(1) Mandate validation of certification of animal handlers and animals, as applicable and address the specific accreditation/certifications required from national organizations, if applicable.

(2) Address animal health requirements, immunization requirements, and certification, as well as guidance on reasonable precautions to ensure an animal's temperament and health are appropriate.

(3) Establish the responsibilities of animal handlers such as providing for the animals' cleanliness, immunizations, restraint, waste removal, liability insurance, identification (handler and animal), training, release of liability, and any other requirements to assure the safety of patients, staff, and animals.

(4). Establish standards for AAI animals. At a minimum, dogs employed in such programs should consistently obey the following five command actions: “Come,” “Down,” “Sit,” “Stay,” and “Leave it.” Additional suggested training and health standards for AAI animals are outlined in Reference (d). Standards for removal of animals in a sanctioned AAI program should be the same as described for service animals in paragraph 1. c. (3) above.

e. Ensure all DHA-administered and managed facility employees, military and civilian, as well as contractors, are aware of this DHA-AI and local/facility policies with respect to animal access to facilities (e.g., signage or onboarding process) and who to contact in case of questions.

3. U.S. ARMY VETERINARY SERVICE/INSTALLATION VETERINARY SERVICES.

Consistent with Reference (e), U.S. Army Veterinary Service/Installation Veterinary Services will:

a. Review AAI program animal records, at no charge, to verify that a physical exam, vaccines, anti-parasiticides, and anti-flea and tick medications are administered as directed, and fecal examinations (no parasites observed) have been performed for each animal at least once a calendar year and when health concerns arise. Installation veterinary services may provide other services on a limited basis to support the HAB programs on their installation, however there may be fees for services performed.

b. Advise the DHA-Facility Director on the health and welfare standards for service animals involved in AAI programs as detailed in References (d) and (e).

c. Ensure DoD-owned animals authorized care and services in DHA-administered and managed facilities will be added to systems of record (e.g., MHS GENESIS) in accordance with established protocols.

d. Ensure that each calendar year a review of potential and ongoing HAB programs with the DHA Facility Director or appointed representative is included in the Veterinary Services Installation Support Plan.

5. HANDLERS. Handlers will:

a. Abide by all policies and guidelines set forth by DHA-Facility Director.

b. Be given a copy of the facility policy upon registration of animal as part of a sanctioned HAB program.

c. To the extent permitted by law, maintain responsibility and liability for any damages or injuries caused by their animals unless said handler is acting within the scope of a DHA program; (i.e., a DHA facility occupational therapy program).

d. Be financially responsible for all costs incurred related to veterinary care, animal transportation, and training unless otherwise covered by a contract or formal agreement.

ENCLOSURE 3

PROCEDURES

1. BACKGROUND

a. As a Federal entity, the Rehabilitation Act, reference (g), applies to DHA and its administered and managed facilities. However, that law incorporates provisions, concerning service dogs and accommodations of them, from reference (f), the Americans with Disabilities Act (ADA).

b. Courts analyze alleged violations of the Rehabilitation Act with the ADA, and reference (g) specifically mentions the ADA. Therefore, for purposes of this policy, and unless otherwise modified by higher headquarters authority and/or mission requirements, DHA will follow references (f) and (g) as well as the other references concerning access to DHA administered and managed facilities.

2. ANIMAL PRESENCE WITHIN DHA FACILITIES

a. It is the sole responsibility of owners or handlers to ensure their service and/or AAI program animals receive adequate veterinary care and provide care and stewardship, to include feeding, watering, sheltering, exercising, toileting, and waste removal.

b. Service animals may have access to DHA-administered and managed facilities as long as such access does not compromise public health and safety and does not interfere with principles of good order and discipline. Animals engaging in AAI may enter DHA-administered and managed facilities only as part of a program approved by DHA-Facility Directors who retain the right to refuse or limit any such programs.

c. Authorized animals will remain under the direct control of the handler at all times. A service animal must have a harness, leash, or other tether, unless the handler's disability prevents use of such controls, or their use would interfere with the service animal's safe, effective performance of work or tasks. In this case, the service animal must be otherwise under the handler's control (e.g., voice control, signals, or other effective means). If the handler must enter a DHA-administered and managed facility where the health of other patients might be compromised by the animal's presence or where service animals are otherwise unauthorized, another capable person may be designated to control and care for a service animal.

d. For a person accompanied by a service animal to visit a patient within a DHA-administered and managed facility, the ward staff, patient, and any roommate(s), must all grant permission for the animal to enter the patient's room. Ward staff should only base an objection

grounded on clinical/medical concerns for a patient's welfare. Should a roommate object, alternative visiting arrangements will be offered as appropriate.

e. DHA-administered and managed facility personnel may make two inquiries to determine whether an animal qualifies as a service animal, and reference (f) states that these are the only questions that may be asked of an individual with a potential service animal:

(1) "Is the dog a service animal required because of a disability?" and

(2) "What work, or task has the dog been trained to perform?"

f. Service animals in training may be granted, at the discretion of the local DHA-Facility Director, access to DHA-administered and managed facilities provided the training conforms to the requirements delineated in this DHA-AI. For medically supervised training programs wherein the trainer benefits from the act of training animals for service for other individuals, access to DHA-administered and managed facilities will be granted at the discretion of the DHA Facility Director.

g. DoD-owned animals (e.g., Military Working Dog, animals used in biomedical research, education, training, and testing) will be allowed access to DHA-administered and managed facilities for medical and ancillary services to include but not limited to diagnostic imaging, laboratory, pharmacy, morgue, and other specialized services, as needed.

h. An exception to policy may be granted by the DHA Facility Director which grants access to individuals involved in training service dogs in an accredited program. By way of another example, the DHA facility director may, but is definitely not required to, grant an exception to policy to accommodate an emotional support dog in a DHA-administered and managed facility that is prescribed within the calendar year by an appropriately licensed mental health provider. If such an exception for the emotional support dog is given, that exception would only apply for that particular DHA-administered and managed facility and only for a set period of time.

3. TRAINING AND CERTIFICATION OF ANIMALS AND PROGRAMS

a. Service Animals. The DHA requires service animals for recovering Service members be trained by entities recognized by the Department of Veterans Affairs (VA) to be recognized as a service animal. For recovering Service members, registration of pets through any source not recognized by the VA does not qualify the pet as a service animal. This requirement does not apply to service animals for employees, other eligible beneficiaries, or other non-DoD visitors (see reference (h)).

b. AAI Programs. As AAI vary greatly in scope, no official DHA enterprise-wide standard or certification currently exists that covers all types of programs. However, animals participating

in AAI should, at a minimum, be certified by a nationally recognized training organization (e.g., American Kennel Club – Canine Good Citizen, Pet Partners, Therapy Dogs International). Animals and handlers designated as ‘facility’, or ‘therapeutic support’ dog teams must be trained by a VA recognized service dog training organization. Until standards are published, the AAI program facilitating organization will maintain the training certifications for animals utilized in AAI programs as outlined in Reference (d). All animals utilized in AAI must have a primary handler, trained, and certified by the same organization certifying the animal.

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

AAA	Animal-Assisted Activity
AAI	Animal-Assisted Intervention
AAT	Animal-Assisted Therapy
ADA	Americans with Disabilities Act
AD-HCA	Assistant Director, Healthcare Administration
DHA	Defense Health Agency
DHA-AI	Defense Health Agency-Administrative Instruction
ESA	Emotional Support Animal
GOA	Government-Owned Animal
HAB	Human-Animal Bond
MWA	Military Working Animal
PT	Physical Therapist
VA	Veterans Affairs

PART II. DEFINITIONS

These terms and their definitions are for the purposes of this DHA-AI.

AAA. Provide opportunities for motivation, education, or recreation to enhance quality of life. The activities are delivered in various environments by specially trained professionals, paraprofessionals, and handlers in association with animals that meet specific criteria, such as having been trained to retrieve objects. Included are “meet and greet” activities involving pets and their handlers visiting people on a scheduled or spontaneous basis, as well as programs permitting family members or friends of facility residents to bring their own pet or the resident's pet for a visit. The same activity may be repeated with many individuals or be conducted in groups. Unlike therapy programs, these are not tailored to a particular person or medical condition. Visit content is spontaneous, and visits are as long or as short as necessary. These animals remain within the possession of therapists, providers, or third-party owners.

AAI. A broad term that includes what is traditionally known as “AAT” or “AAA.”

AAT. A goal-directed intervention in which an animal meeting specific criteria is an integral part of the treatment process. These programs are usually directed and delivered by human health or human services professionals with specialized expertise and within the scope of practice of their profession. AAT is designed to improve human physical, social, emotional, and cognitive (e.g., thinking, and intellectual skills) function, and animals may be formally included in activities such as physical, occupational, or speech therapy. Therapy programs are provided in a variety of settings and may involve individuals or groups. In AAT, specified goals and objectives are determined for each patient, and each patient’s progress is evaluated and documented. (e.g., a horse used in equine therapy as part of a goal-directed treatment process designed by an occupational therapist to improve balance). These animals remain within the possession of therapists, providers, or third-party owners.

Companion/Skilled companion animal. Not legally defined; accepted as another term for “pet.” Emotional support animals fall under companion animal or pet. See also definition of Emotional Support Animals (ESA).

DoD-owned animal. Animals that are the property of a DoD component and authorized care by Army Veterinary Services. These include but are not limited to military working animals (MWA); authorized unit mascots; animals supported through appropriated and non-appropriated funds; stray animals on military installations in a DoD operated stray facility within the first five calendar days; animals used in biomedical research, education, training, and testing; and wild animals in confinement on military installations, such as deer (see also “military working animals”). For the purposes of this policy, the only DoD-owned animals authorized access to a DHA-administered and managed facility for the purposes of medical or ancillary services is limited to MWAs and animals used in biomedical research, education, training, and testing.

ESAs. Animals belonging to individuals for the emotional support value or comfort provided by the animal. These animals do not qualify as service animals (not trained by an accredited organization for a specific need) and ESA handlers do not receive the same accommodations as service dog handlers. To legally be considered an emotional support animal, or emotional support dog, the pet must be prescribed by a licensed mental health professional to a person with a disabling mental illness – See Reference (I). Emotional support dogs can be any age and any breed.

Facility Dog. A dog that is specially trained by a VA recognized service dog training organization for AAI and can be included in AAA or AAT programs. Dogs are provided to handlers (primarily civilian) by the accredited organization for use in authorized DoD HAB programs.

GOA. GOAs include animals owned by the DoD and animals owned by other Federal agencies when existing agreements exist for the provision of care to these animals by the Army.

HAB program(s). Programs involving interactions between people and animals, their attachments, and the significance of the HAB in people's mental, social, and physical health. HAB programs include AAA and AAT.

Handler. Qualified persons for whom a service animal does work or performs tasks, or persons with primary responsibility and control of an animal utilized in AAI programs.

MWA. An animal that is owned by DoD, has a specific military mission, and is considered an active-duty Service member for the purposes of medical care and support while on active duty. This includes, but is not limited to, military working dogs, multi-purpose canines, Category 1 HAB animals (as defined in Reference (d)), military working equids, and U.S. Navy marine mammals.

Mission-Based Trauma Recovery. Form of therapy that helps Warriors recovering from the stress of combat reconnect with their families, communities, and life. By interacting with the dogs as they move from puppyhood to training to adult service dogs, Warrior Trainers benefit from a physiological and psychological animal-human connection. These programs are administered by non-governmental animal training organizations (e.g., Warrior Canine Connection) that partner with larger military treatment facilities.

Occupational Therapist. A licensed and privileged healthcare professional who employs the therapeutic use of everyday activities (occupations) to help patients participate in the activities they want and need to do. Common occupational therapy interventions include helping children with disabilities to participate fully in school and social situations, helping people recovering from injury to regain skills, and providing supports for older adults experiencing physical and cognitive changes.

PT. A licensed and privileged healthcare professional who helps patients reduce pain and either improve or restore mobility, without surgery in most cases, and often resulting in reduced long-term use of prescription medication(s). PTs can teach patients how to prevent or manage their condition to achieve long-term health benefits. After examining the patient, a PT develops a plan incorporating treatment technique to promote the patient's ability to move, reduce pain, restore function, and prevent disability. A PT also works with patients to prevent mobility loss by developing fitness-and wellness-oriented programs that will enable a healthier, more active lifestyle.

Service animals. In accordance with Reference (f), the ADA uses animals individually trained to do work or perform tasks for people with disabilities: (i.e., Service Dog); for military members, per Reference (h), this must be a dog obtained from an accredited service dog organization approved by the Department of Veterans Affairs that is individually trained to do work or perform tasks for the benefit of an individual with a physical or mental disability. The dog is trained to respond to a verbal command or condition of the qualified recovering Service member.

These animals remain in possession of the recovering service member or beneficiary. Reference (f) only recognizes dogs and miniature horses as service animals. Other species of animals, whether wild or domestic, trained, or untrained, are not service dogs for the purposes of this definition. Dogs that are “in training” or whose sole function is to provide emotional support, comfort, therapy, or companionship are not service animals under reference (f).

Skilled companion animals, emotional support animals, and companion animals. Animals that do not meet the definition of a “service animal” and remain in the possession of a beneficiary are defined as pets and therefore do not receive access or privileges granted to service dogs, therapy animals, or activity animals.

Therapy animals. Not legally defined by Federal law. Often these are animals that did not complete service animal or service dog training due to their health, disposition, trainability, or other factors but are made available as pets for people who have disabilities. These animals might or might not meet the definition of service animals.

Therapeutic Support Dog. A facility dog embedded into a military unit that provides ancillary clinical, spiritual, emotional, and/or psychological/psychiatric health services. Handlers (primarily military) are often practitioners such as psychiatrists, chaplains, Military and Family Life Counselors, licensed social workers, or other professionals that work in the behavioral or occupational health fields. Dog and handler teams perform duties within the unit and may be expeditionary. These dogs may be categorized by Army Veterinary Services as DoD-owned HAB animals if they are placed on orders by the representative command. If the practitioner is a Service member, the dog might accompany the Service member for permanent change of station (PCS) moves.