# SSAI Monograph – Text Access Version

## Contents

"Loving people and animals makes us stronger in the right ways and weaker in the right ways. Even if animals and people leave, even if they die, they leave us better. So we keep loving, even though we might lose, because loving teaches us and changes us."
— Glennon Doyle Melton, *Carry On, Warrior: The Power of Embracing Your Messy, Beautiful Life*.

"Outside of a dog, a book is man's best friend.  Inside of a dog it's too dark to read."
— Groucho Marx, *The Essential Groucho: Writings for by and About Groucho Marx*.

# The Story: About the Project

(This section is written in clear language for easier reading access.)

## Pickering has seen big changes in the numbers of support animals in public.

Some retail stores and others approached Pickering City Councillors about their concerns.  Some felt it was confusing to see more animals inside public places that seemed like pets.  People, like store owners and mall managers felt it was their job to manage this in their stores.  But they also felt confused about how to do this.  They knew different people may have different rights.  They wondered how everyone's rights could be respected.  It has been confusing.

Questions started like:

- Is it a support animal if it only looks like someone's pet?
- Is it a service dog if the person doesn't look like they have a disability?
- How do I know what kinds of animals have a right to be in public buildings?
- How do I know if some animals have the right to be in places that other animals are not allowed?
- Can I ask the owners about their animal or their need for the animal?
- I serve food.  What do I do when my customers complain about an animal in my store?
- Is there an easy way to identify if the animal is allowed to be in my store?

They talked about special colour license tags.  Thoughts were these might help us to know the animal is providing recognized service or support for their owner.

## Stakeholders Engaged

City councillors came to the Pickering Accessibility Advisory Committee (PAAC) to share their concerns.  Committee members wanted to make sure everyone would be part of any discussions, ideas and solutions.  This means people who:

- Work in places like stores, libraries, and restaurants.
- Need and use a service or support animal.
- Work in the city like animal control and provide animal licenses.
- Support people with disabilities and those that need animals to assist them.

We call these people "stakeholders".  Different stakeholders would be affected by ideas and solutions in different ways.  They would need to be part of the ideas.  They would need to sit at the table for all project planning, and for doing the work.

## Resources

The PAAC started a separate action group called the Service and Support Animal Task Group.  Their job was to look deeper into the concerns.  There have been a lot of news about animals in the community and in places like airports and public transit.  But the stories don't give everybody's side.  The stories also don't look at reasons why there seems to be more animals and

confusion around them.  The Task Group looked into the laws behind service animals and people's rights.  They also explored the different kinds of service animals and how they fit into the laws and peoples' lives.

All this was helpful.  But understanding what stakeholders actually experience was most important.  The Province of Ontario shared many of the concerns and provided direct support to the project.  The first thing the task group did then was to organize the project for increased activity.  The project purpose was formalized.  We also identified our resources and came up with ways to get the job done.  From this the Service and Support Animal Initiative was formed – the SSAI.

## More Stakeholders

The next thing to do was to hear from as many stakeholders as possible – to get their experiences, opinions, concerns, and ideas.  The SSAI leaders thought it best to survey as many stakeholders as possible.  A survey was designed to get stakeholders' experiences and opinions.  Survey responses showed that each stakeholder group was clearly experiencing issues around community access with service and support animals.  This included everyone, from retail stores to service and support animal users alike.  The survey showed that different stakeholders are affected in different ways from each other.  It also showed that different stakeholders shared many of the same concerns.

The SSAI tasks included:

- Research the federal and provincial laws and how they affect stakeholders.  We found that many laws could be confusing and sometimes contradict each other.

- Search through articles to see what was happening around Ontario, Canada and The U.S.  This included looking if other communities have been working on similar efforts as the SSAI.

- Organize the many issues into categories and list issues that fall under each.

- Collect and assess the survey results from over 350 stakeholders.  This amounted to over 54,000 pieces of information.

- Produce a source of background information, including laws and survey results.  This was first used to inform the Innovation Lab participants.

- Hold a Virtual Innovation Lab (VIL), designed, run, and participated by only stakeholders.  The Innovation lab was a workshop where all stakeholders:
  - Learned from the background information that the SSAI provided.
  - Learned from each other while working together.
  - Worked on ideas and solutions together.

- Create a VIL report.  This was sent to a new set of stakeholders for their opinions and ideas on the SSAI and Innovation Lab outcomes.  This way we heard from stakeholders that had not yet worked on SSAI tasks.  It also helped us make sure the project was on the right path.

## Making Sense of What We Got

After getting all this great information and data, the SSAI had to make sense of it.  So, we went to work:

- Sorting through the survey results for them to make sense.

- Turning the Innovation Lab content into usable information for stakeholders.

- Listening to what stakeholders said.

- Organizing all the other information we gathered.

- Turning all this into ideas, solutions, and recommendations for stakeholder groups and the public.

The SSAI is all about:

- Engaging stakeholders.

- Supporting and reporting their responses, concerns, and ideas.

- Using stakeholders to help identify the problems and share ideas for solutions.

## Reporting

We want you to know about the project and its outcomes.  To do this we are providing you three resources:

- A Published Monograph.

- A more detailed Study Report.

- Poster Handouts.

## The Monograph & Reporting

The Monograph is designed to give you:

- Plain Language and Executive Summaries.

- An overview of the SSAI, its design, and methods.

- An overview of how survey data was gathered and how it guided the project.

- Project Outcomes & Recommendations.

The Detailed Study Report can be used as a companion to the Monograph.  It offers additional detailed information, especially in:

- The design, processes, and methods of the SSAI.

- Specific supporting data.

- Results of the in-depth study, comparing federal, provincial laws and regulations.

- The same outcomes and recommendations as the Monograph.

- Appendix resources.

The Detailed Study Report will be made available on the City of Pickering website, and other possible venues.  It should be used as a companion report to the Monograph for referencing the additional detail it provides.

## Poster Handouts

We have also produced poster-styled resources that can be used as stand-alone tools, mainly by municipalities.  They are one-page each, of the project recommendations, guides to help stakeholders put our ideas into action.  (Provided in English and French).

## Public Launch

The SSAI is holding a half-day "Public Launch Event" in mid-December for everyone to join, learn, share, and discuss.

## Our Resources are Available

The reports, and poster handouts will be available on the City of Pickering Website.  Videos from the Public launch will also be there.  The Monograph will be available in its published version, and in a separate more accessible format.  The "Detailed Study Report" will be provided in the more accessible format only.

## What the SSAI is About

The SSAI has been about reaching out, listening, and working through concerns and ideas.  It's about working as stakeholders, to help stakeholders.  It was designed to further understand the issues, from each other, and provide supporting information from the work.  The SSAI has not been about isolated academic research, one point of view, or recommending things that could cause more problems for stakeholders.

The SSAI used a core concept for the project: "Nothing About Us Without Us".  The phrase has become an important point for people with disabilities.  Results from working on disability-related issues can be a problem if people with disabilities are not included from the beginning, through to the end.

(A closing summary is also written for easier reading at the end of this report.  Please go to, "What We Learned", page 48.)

# Executive Summary

Numbers of people across Canada have reported being confused about having many more animals in public settings these days.  Are they all service animals? Are they all legal?  How can I tell?  How do we respect theirs and others' rights?

The Service and Support Animal Initiative (SSAI) has been a grassroots effort to understand what is really happening.  It was implemented through the Pickering Accessibility Advisory Committee.  It was conceived, planned, and implemented by stakeholders.  The stakeholders included

- Animal Users and Direct Support Persons
- Businesses & Services
- Municipal Government

- Disability Support Organizations
- Service Dog Training Organizations

With direct support from the Ontario Ministry for Seniors and Accessibility, the SSAI was able to plan a project with robust engagement of high numbers and areas of stakeholders. It used methods from qualitative study standards and collected well over 75,000 data points using a variety of engagement tools. Information was triangulated throughout the project to increase the validity of the SSAI findings. This included an extensive information search, large Public Survey, an Innovation Lab, Secondary Consultations, and reviews provided by various stakeholder-based organization and services.

Based on our methods, it became evident that many issues do indeed exist around community access by persons who use service and support animals. Occurrences have gone well beyond general random thoughts and anecdotal observations.

Four distinct issue areas were affirmed in the subjects of:

1. Regulations, Policies and Procedures.
2. Emerging Issues/Problems.
3. Systemic/Practical Concerns.
4. Education/Awareness and Public Service.

The issue areas were studied further to expand each into specific concerns shared by a majority of stakeholders. Data and formal exploration into these were used to prioritize the issues by:

- The percentage of issue recognition by all stakeholders.
- The degree an issue is shared across stakeholder groups.

From these findings and through dynamic stakeholder engagement (e.g., The Virtual Innovation Lab), five detailed recommendations are made in this report. It is recommended that the five recommendations be picked up by the primary stakeholders identified in each and used to implement change in their areas.

The project's issue prioritizations and recommendations were based on an essential premise – that one issue usually affects all stakeholders, though sometimes to different degrees and in different ways. Recommendations were also based on the following four criteria (as advanced from an integration of Kepner Tregoe principles and Human Rights criteria):

1. All disabilities & stakeholders matter.
2. Good solutions should represent supports for a full range of disabilities/stakeholders.
3. Good solutions should leverage the full potential of animals to support people with disabilities.
4. Good solutions should not negatively impact competing rights.

In addition to the five recommendations, five complex, ongoing, and emerging issues have been identified and are addressed at length in this report. It is recommended they become part of ongoing efforts by various stakeholders, with hope that a meaningful level of resolution can occur, beyond what can be reasonably expected within the scope of the SSAI.

**COVID-19 Impact**: Additionally, the impact of COVID-19 on service and support animals in the community is discussed at length, especially with the reopening of our communities.

# Data Collection & Reporting

## Project Data Collection Sequence

Data was collected through three online survey-based methods. In the following sequence:

- Public Survey:  Announced and available in November 2020 with continued announcement efforts into February 2021.  Initial collection was performed for use in the Innovation Lab. Responses plateaued by February 2021.  Final data capture began in March 2021.

- Innovation Lab Registration/Survey:  Announced and available in December 2020. Participant numbers reached beyond the limit of 30+ and the survey was closed by January 28, 2021. Data capture was implemented before the first lab sessions began on January 28, 2021.

- Secondary Consultation:  Announced and available in March 2021.  Recruitment efforts continued to November 1, 2021.  Final data capture, November 12, 2021.

## Provided Report Formats

Reporting for the SSAI is provided in two forms:

- Public Monograph:  A report providing key overview information including background, methods, findings, and recommendations.  Available in two formats:
  - Design-Published to include interest-capturing formatting, graphics, and images.
  - Accessible PDF (from the original accessible MS Word creation)
- Detailed Study Report:  A full, detailed ancillary companion report to the Monograph.  It contains extensive methodology information, statistics tables, and appendix references.  It follows the same section flow as the Monograph.  This report can be used as a detailed reference to any part of the Monograph, read in its entirety or referenced for select supportive detail to the Monograph.   It is available in one format:
  - Accessible PDF (from original accessible MS Word creation).

# Overview of Service & Support Animals in Society

This brief overview is provided as a narrative and is not intended to be an exhaustive presentation of service and support animal history, training, and access.

## Historical Narrative – Animals Assisting Humans

It is probably safe to say that animals have been brought into service for humans throughout the ages – animals of various types, performing various duties and evolving over time.  From hunting, to planting and harvesting, transportation, protection, and as "beasts of labour", humankind has perpetually benefitted from animals providing direct services throughout time.  One could argue that this coexistence has had a natural course of development and in many ways, the presence of animals in service to humans has been a long-accepted reality.

The history of dogs providing direct services for people with disabilities is well documented, with a recognized advent of guide dogs supporting veterans having sustained vision loss and blindness from World War I and continuing from World War II – leading to formal training schools in Europe and North America in the 1920s – 1960s.

Likewise, animals have provided companionship and psycho-emotional support for their human counterparts in a variety of ways through time.  From highly and specifically trained service dogs, to the therapeutic effect provided by many animals, we find these animals in direct support for people with both specific and general needs.

## Assistance Dog Training Schools Emerge:

Following the post-WWI/WWII establishment of guide dog training centres, the concept of a "Service Dog" and the field of service dog training and provision in North America can be traced to Canine Companions for Independence.  It was founded in California, in 1975, reportedly as a first program of this kind – training and providing various types of service dogs.

Many service dog schools, including those established earlier for guide dogs, have continued to develop throughout the U.S. and Canada.  They are typically associated with national and/or international, independent oversight and accrediting organizations for established standards and quality of service dog training.  Training programs can differ, but generally include the following aspects:

- They pair people with disabilities with highly trained assistance dogs typically at no cost to the recipient.

- Some schools have also developed breeding programs as an improved source for their dogs.

- Puppies are raised by volunteers for approximately 1-½ years, until it is time for them to enter a formal training program.  Through a volunteer "foster home", young dogs are expected to gain environmental acclimation and socialization, including familiarity with things like public transportation, public spaces, elevators, escalators, etc., and establishing a foundation of appropriate behaviours in public, around people, children, and other animals.

- After the foster home program, formal training is provided for the dogs, over many months and can include in-depth health and temperament assessments/provision; teaching of skills and commands intended to foster prospective recipients' independence; and providing further environmental acclimation and training – including assuring appropriate socialization and behaviours are demonstrated by each dog.  Dogs can be trained in a variety of specific services and supports, such as for hearing, mobility, vision guides, mental health, autism, health/medical alerts, etc.

- As the next step following the formal dog training program, human applicants are matched with a dog for a multi-week program of in-person classes that teach the recipients how to work with their new canine partners.  This includes components such as learning about dog psychology, ethical treatment, dog grooming and care, appropriate dog and user behaviours and expectations, as well as learning and applying the commands and skills that the dogs gained.  The partnered training includes substantial real learning/practice sessions in the community.  Matching the dog with the person is typically done carefully to make sure their activity levels and personalities match.

- Lastly, service dog recipients can typically return to their school for follow-up over the course of the placement or for extra training at any time.

## A Variety of Needs – A Variety of Animal/Training Sources

Recognition of a variety of animal-related service needs has developed over time – generally since the late 20th century to today.  These service areas can include (the following is a non-exhaustive listing of examples, provided in alphabetical order):

- Autism Supports.
- Blind/Vision-Impairment, Guide Dogs.
- Deaf and Hard of Hearing Supports.
- Developmental Disability Supports (including for fetal alcohol spectrum disorders).
- Therapy Animals and Facility Support Dogs (These animal services are provided through a facilitative animal handler versus the animal having been trained to a specific person's needs.).
- Emotional/Psychological and other Mental Health Supports,
- Medical/Health Alerts (including seizure, diabetic, and environmental allergen alerts).
- Mobility Assistance.
- Post Traumatic Stress Disorder (PTSD) Supports.

A casual assessment of the above list would indicate that:

- A large percentage of our population could benefit from service and support animals.
- The demand for service and support animals likely exceeds the supply.
- The necessary knowledge and skills required for training animals for the above service and support categories is extensive and complex.

In addition to the various standardized training programs described above under "Service Dog Training Schools Emerge", and presumably as a response to the human need exceeding the animal availability, a variety of training methods/services (or lack thereof) can be found through basic internet searches, to include:

- Online training courses, training of individuals, for a fee, with training provided entirely online, and includes premade/modular courses, and a certification.
- Individuals paid to provide individual training for a person's prospective service/support animal.
- Service/Support animal users providing their own training either independently or under the guidance of an individual trainer.
- Emerging training centres in various stages of development.
- Individuals obtaining dogs having not successfully completed a standardized service dog training program.
- Basic "obedience" training only – may include appropriate relief area use and behaviours (common for dogs and cats).
- No known or reported training.

One could envision a problem with people having real needs for animals with adequate training, yet unable to satisfy their needs to pair up with an adequately trained animal.  In the authors' opinion, this is a critical issue that:

1. Can impede one's independent and safe access to the community.

2. Create problematic situations where the public (including other service/support animal users) is uncomfortable with the presence of the user and their animal.

3. Can compromise safe and responsible service/support animal use in the community.

## Purpose:  Service & Support Animal Initiative

The purpose of the SSAI has been to engage all applicable stakeholders, to:

- Identify prominent issues related to community access with service and support animals – including challenges for businesses, municipalities, and other client-facing organizations.  Key to this has also been addressing barriers that regularly face users of service and support animals, through collaborating directly with stakeholders from that group, and their support systems.

- Respond with stakeholder co-designed recommendations to address the identified challenges and barriers to community access for people with service and support animals.

- Provide resources for stakeholders and the community, as drawn from the:

  - Public Survey results.

  - Innovation Lab outcomes.

  - Secondary input consultation with additional stakeholders.

  - Other consultative research and outcome efforts through the SSAI.

- Educate, through public awareness access and forums while using the resources and information base developed through the SSAI.

## Stakeholder Driven

The Service & Support Animal Initiative (SSAI) has been a stakeholder focused endeavour – from inception, through implementation, and as represented in the data collection, reporting and recommendations.  The SSAI was advanced through:

- Broad stakeholder networking.

- Input from a substantively designed public survey with over 350 respondents providing over 54,000 datapoints from the key stakeholder groups.

- A robustly designed Innovation Lab / Co-Design process with key stakeholders as the full majority of directly engaged participants.

- Project design and consultation provided through known accessibility professionals, including those with lived experience.

# Are There Issues? – Experiences and Opinions

We just love our own paradigms.  This makes sense individually, because it is how we all try to make sense out of a large complex world.  So, the first step for the SSAI was to reach out past our own paradigms.  Reach out to a broader number of people, outside the project/city leaders and smaller leadership group responsible for articulating the SSAI.  We needed to find out what many others

(from the four stakeholder group categories) were experiencing and thinking. Our first public effort would be the SSAI Public Survey

Experiences & Opinions:  Once we determined a well-designed public survey was in order, next would be to ask the public what they thought – more specifically, what each survey respondent has **experienced**, and what each respondent **thinks** or **feels** about their experiences (aka: what are their **Opinions**).

The survey was designed with two separate response areas – 1. "Your Experience" and 2. "Your Opinions".  In fact, the email blasts that went out to announce and engage interested survey takers were titled "Opinions Wanted".  And, to help make this qualitative study more valid, we wanted the respondent to first think of their **experiences**, before giving us their **opinions**.

The results have shown that issues do exist and that respondents were able to soundly respond to the survey's statement items, with interrelated, grounded points of view.

## Experiences

The survey helped us see where individuals see themselves fit, into one of four stakeholder groups:

- **Animal Users and Support Persons** (A person, [or a direct support person for a person], that uses a service/support animal in public.)
- **Governance, including Advisory Committee Members** (e.g., Municipal, Provincial, Federal; Regulations, Rules, and Policies).
- **Businesses & Public Services** (e.g., retail stores, recreation, libraries, restaurants, transportation, hotels, theatres, medical/health services, Chambers of Commerce, customer services, "main street", community centres, commerce/trade organizations, etc.)
- **Advocacy/Support Organizations** (e.g., animal training, training certification, accessibility/disability advocacy, accessibility/disability services).

Note:  The above four stakeholder groups, as engaged, and referred to throughout this report – including statistically – will be more simply indicated by their group names (without the parenthetical examples), as follows:

- Animal Users / Support-Persons
- Governance
- Businesses & Public Services
- Advocacy/Support Organizations

It is important to recognize the diversity, different experiences, and distinctive perspectives brought to the table by each of the above groups.  This was an intended and purposeful design of the SSAI.  It provided all aspects of the project with a robust representational process – such as stakeholder engagement, project design, issue identification, information gathering, problem solving, etc. Stakeholder representation in the Public Survey is provided below in the following circle graph:

**Circle Graph:  Public Survey Representation per Group**
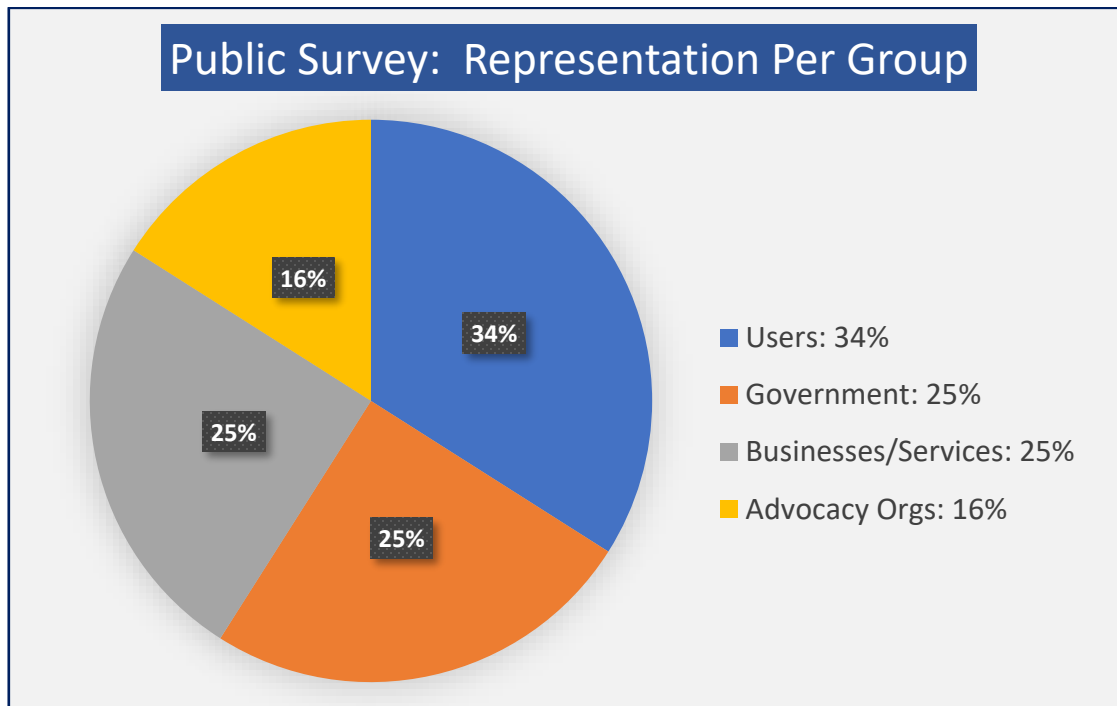


As shown in the above graph, among the four stakeholder groups, representation was as follows in the Public Survey:

- Service & Support Animal Users:  34%

- Governance:  25%

- Businesses and Public Services:  25%

- Advocacy and Animal Training:  16%

Once a person identified with one of the four groups in the survey, they were taken to the set of items designed for their group.  First, an additional level of anonymous details about the respondent were gathered (e.g., demographics, type of animal or organization, etc.).  Then all respondents were provided parallel survey items (based on their chosen group) that fell into the four following categories:

1. Regulations, Policies & Procedures

2. Emerging Issues/Problems

3. Systemic/Practical Concerns

4. Education/Awareness & Public Service

The experience items fell into the above issue areas and asked about things like: the presence of persons with service/support animals using their services; confusion or clarity in the role of the animals; troublesome barriers or refused/limited entry for users; conflicts with various customer/client rights; etc.

The survey items allowed the respondents to share their experience levels by choosing "seldom/never", "sometimes", or "frequently".  Statements were poised as either positive or

negative, depending on the potential circumstance.  This allowed our data analysis to identify prominent experiences by respondents, and further categorize each group's experience responses as either positive, mixed, or negative.  The circle charts below reflect that perspective.

**Circle Graph:  Service/Support Animal Users – Respondent Experiences to Community Access.**

## Service/Support Animal Users
### Respondent Experiences

- Positive: 9%
- Mixed: 20%
- Negative: 71%
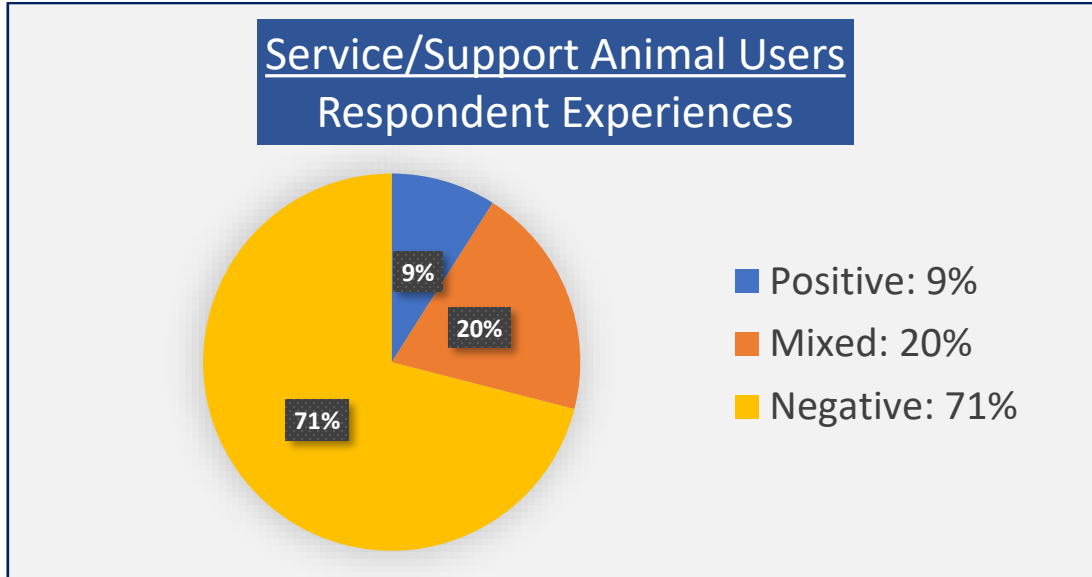
**Circle Graph:  Governance Group – Respondent Experiences.**

## Governance Group
### Respondent Experiences

- Positive: 12%
- Mixed: 28%
- Negative: 60%
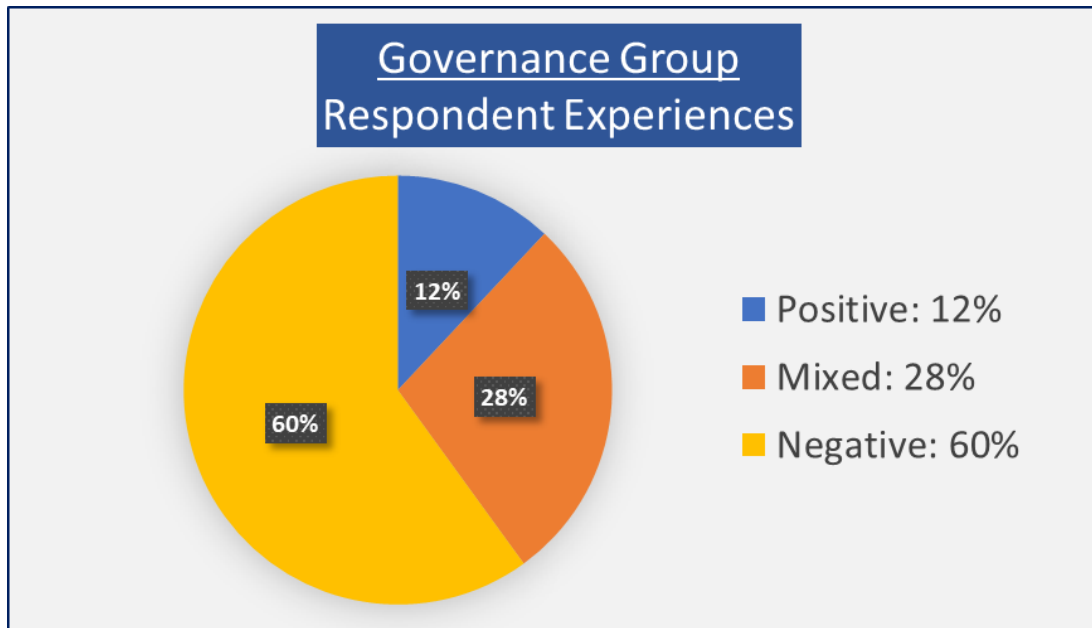
**Circle Graph:  Businesses & Services – Respondent Experiences.**
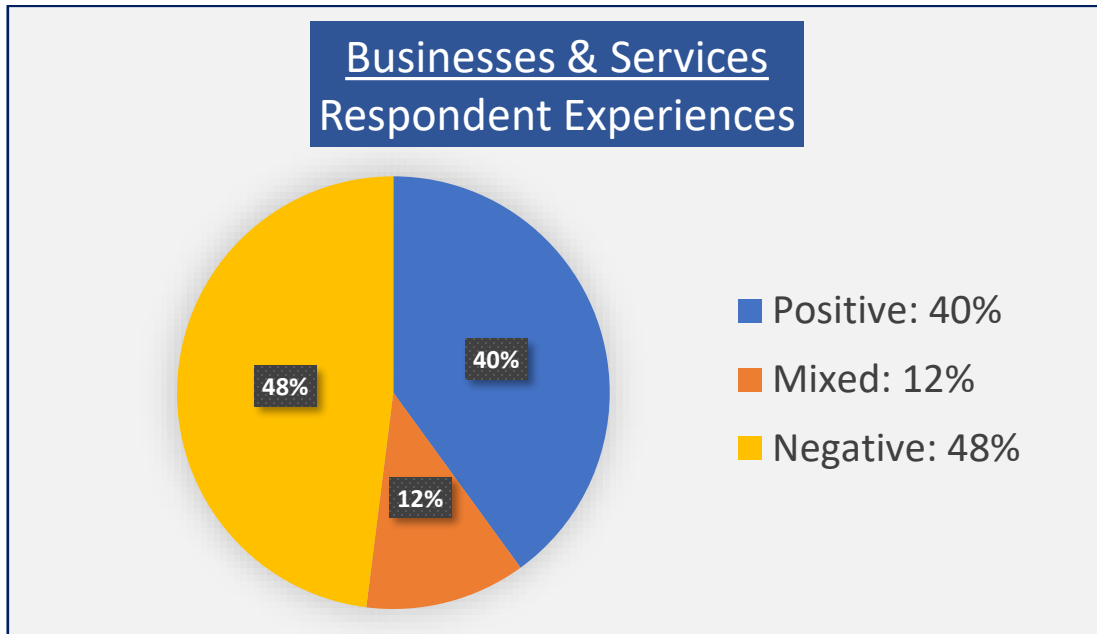


**Circle Graph:  Advocacy & Animal Training Group – Respondent Experiences.**
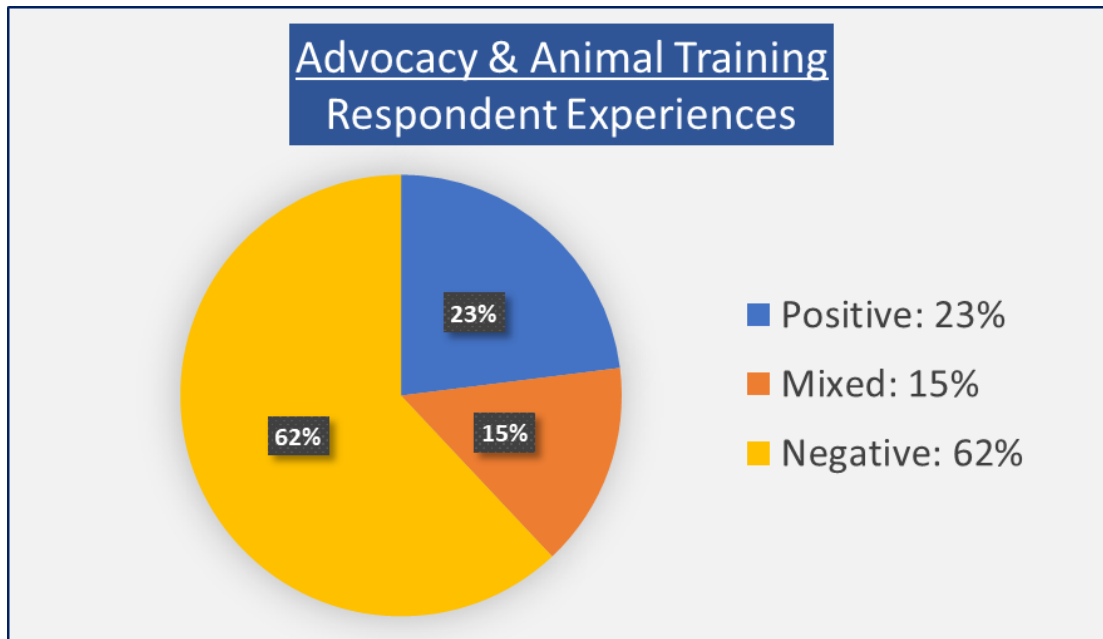


The results have revealed that more negative experiences, (aka issues), were shared with us, than those that were mixed or positive, as follows:

- Service & Support Animal Users:  71% Identified Issues (Compared to 9% Positive Experiences)

- Governance:  60% Identified Issues (Compared to 12% Positive Experiences)

- Businesses and Public Services: 48% Identified Issues (Though this was also close to the 40% that reported positive experiences.)

- Advocacy and Animal Training:  62% Identified Issues (Compared to 23% Positive Experiences)

The bar graph below represents the percentage of issues experienced by group (as detailed above).
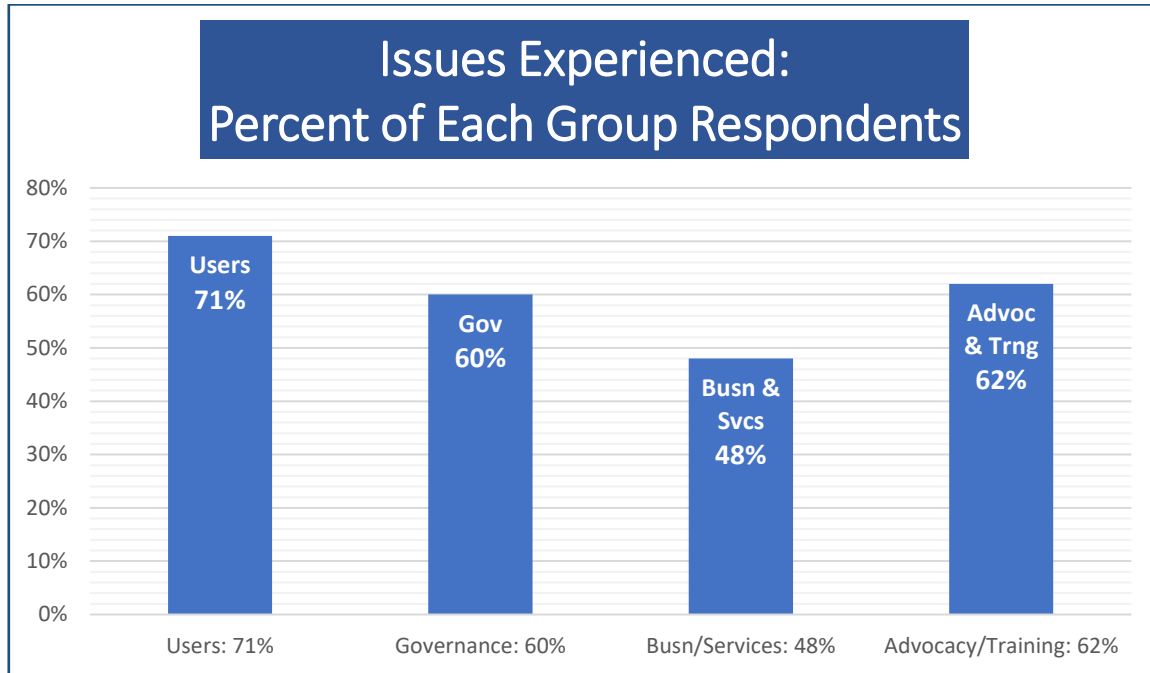


## A Note About Survey "Items"

Note:  The terms used in this report around survey contents – i.e., "response items", "statement items", or simply "items" – refer to the individual questionnaire items, provided in the form of statements, to which a respondent would select from Likert-scaled options, 1-5, or "N/A".  For example:

"Provincial/Federal-based regulations & requirements are confusing, inconsistent or cause conflicts."  Response options:

1. Strongly Disagree; 2. Disagree; 3. Neutral or Undecided; 4. Agree; 5. Strongly Agree; N/A

## Two Qualifying Survey Items

The concern remained – making sure the Task Group had not conjured up, but rather accurately conjectured that real issues exist and are shared by a broad base of stakeholders.  The first two survey items bridged the Experience and Opinion sections.  They were used for qualifying if overall issues are perceived by the majority of stakeholders.  The two qualifying survey items were a hybrid of experience and opinion, as follows:

1. There is a big Increase in numbers of service/support animals in public, (including well-trained animals, untrained animals, emotional support animals, misrepresented animals).

2. There is a noticeable increase in the misrepresentation of animals as service/support animals in public, (aka, "Fake" Service dogs/animals).

The following two tables provide the percentage of responses per group, specifically the "Agree" and "Strongly Agree" responses:

**Table: "There is a big Increase in numbers of service/support animals in public, (including well-trained animals, untrained animals, emotional support animals, misrepresented animals)."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 31% | 45% | **76%** |
| Governance | 46% | 26% | **72%** |
| Public Businesses, Organizations, Services | 33% | 19% | **52%** |
| Advocacy / Training | 32% | 50% | **82%** |
| All 4 Groups (Average) | 36% | 34% | **70%** |

**Table: "There is a noticeable increase in the misrepresentation of animals as service/support animals in public, (aka, "Fake" Service dogs/animals)."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 28% | 47% | **75%** |
| Governance | 34% | 25% | **59%** |
| Public Businesses, Organizations, Services | 35% | 15% | **50%** |
| Advocacy / Training | 32% | 46% | **78%** |
| All 4 Groups (Average) | 32% | 33% | **65%** |

From the above data, we can infer that a plurality of persons, as stakeholders, agree that notable issues exist around community access by users with service/support animals.  Seen as plausible, this allowed the SSAI to confidently pursue a greater gathering and analysis of data.

Note 1:  The term "fake", though controversial for some, is commonly used among the stakeholder groups, and the authors felt it was important to keep statements concise and relevant.  For respondents who have not agreed with this term or a condition it represents, additional clarifying survey items allowed this to be captured, without bias.

Note 2: In gauging the significance of an issue, the authors determined that 30% is significant (versus 50% and above).  Consider this like a "customer service" assessment.  If 30% of one's customers or clients identified an issue with their services, 30% or more would represent a significant breakdown in the service.  Thus, 30% or more of stakeholders perceiving issues in an area of service/support animals in the community could well represent a notable breakdown in the system providing service/support animal users' access to the community.

## Opinions

The second full grouping, and majority of survey items, was about getting opinions from the respondents and doing so in a way to gather a lot of in-depth, highly relevant data to be used in analyzing results in a variety of ways.  This grouping also covered each of the four issue areas and provided about 10 items per issue area, per group, while addressing another level of 4 – 5 issues under each area.

This supported the anonymous expression of differing, sometimes competing, opinions.

The openly expressed opinions (through anonymous survey responses) were used as a foundation for a planned interactive, group-learning and problem-solving process – the Innovation Lab.  It was designed to consider all facets of a robust group of stakeholders.  Nowhere in the project design and implementation was this more dynamic than in the Innovation Lab and Co-Design processes.  To support these processes, pertinent data from the Public Survey, was later combined with Innovation Lab participant engagement and used to further represent the diversity of experiences and perspectives of key issues and concerns.

# More Project Detail:  SSAI Genesis, Purpose, Resources & Methods

## Project Genesis – Pickering Service Animal Task Group

The SSAI, originally identified as the Service Animal Task Group (SATG), was formed, through the City of Pickering Accessibility Advisory Committee (PAAC).  This was in response to city councillors having approached the committee for advice on addressing concerns expressed by retail businesses and their needs which included:

- Clarification of animal types and their roles.
- Easily recognizable identification system/methods.
- Access rights for the various animals.
- Human Rights for animal users, the public, store owners, etc.

The PAAC acknowledged these concerns as emerging issues increasingly shared by communities throughout Ontario and Canada.  The committee made initial recommendations to:

- Engage relevant stakeholders to respond to the issues of concern and further identify and prioritize the issues.
- Perform a review of the variety of issues reported in Ontario and Canada.
- Perform a review of regulations, laws, rules, and policies that impact the areas of concern, for both Ontario and Canada.
- Make initial formal recommendations to the City, based on the above efforts and outcomes.

Per city protocol, an initial Service Animal Task Group (SATG) was formed to begin working on the above charges.  The makeup of the Task Group was intended, from the beginning, to create as much of a represented perspective of stakeholders as possible.  The stakeholder cross-section continued to evolve as more stakeholder areas were identified.

The Task Group depended on a make-up of leadership that included:

- Service animal users.

- Direct customer/client services, in retail and public services.

- Accessibility professionals.

- Municipal by-laws and enforcement.

- High-level dog training and certification experience.

- Nationally standardized therapy animal services.

The Task Group activated members with a high level of engagement and commitment through notable discussions, exploration, researching, resource gathering, identifying current and emerging Issues, and guiding the project's efforts.

## Strategic Resourcing:  Stakeholder Representation

As reported, Stakeholders that were engaged in the SSAI collaborative processes have represented those key groups that are directly affected by and engaged in community access with service/support animals.  As the project progressed in its knowledgebase, additional stakeholders were invited to further diversify the group's makeup.  These stakeholder experiences and perspectives have been key to the project efforts and outcomes.

## Community Access in Ontario

The project's stakeholder focus has been on community access in Ontario.  It is important to recognize the regulatory environment that is unique to Ontario.  (This includes what is perceived as broad access rights for "emotional support animal" users).  Likewise, attention to the Canadian national environment was included by recognizing and considering the impact on community access, by the Canadian federal regulatory environment.

Realistically, **all** applicable regulations with their rules and processes directly impact the full range of policies and procedures for community-based services, including for businesses, retail, and public services.  This would include service dog training organizations, and nationally based organizations such as airline companies and other federally regulated transportation.  This in turn impacts a full range of stakeholders' lives and organizations.

## Methods:  Stakeholder Engagement

Stakeholder engagement was facilitated through the following:

- Stakeholder-Based Project Inception

- Project Design and Implementation

- Broad-Based Public Survey Design and Implementation

- The Virtual Innovation Lab (VIL), including an initial VIL registrant survey, pulling together VIL participants' concerns and priorities.

- Formalized VIL Secondary Consultative Input provided through the same cross-section of stakeholders as participated in the VIL, but having not previously participated.

- Public Survey Revisited:  Further, in-depth analysis of the significant quantitative and qualitative data attained through the public survey, refining the measurable outcomes into meaningful and purposeful patterns of current and viable information.

- Additional comparative analysis to establish validity for the SSAI outcomes.

# Innovation Lab Introduction

## Innovation Lab by Design – Codesigning Ideas and Solutions

As reported, an Innovation Lab, aka Co-Design Lab, was a core part of the SSAI stakeholder engagement plan.  An Innovation Lab enables its participants to work on complex challenges, come up with new ideas, and co-create solutions that no single group or entity could accomplish on their own.

Innovation Labs can take on a variety of designs, formats, and problem/solution-seeking approaches.  Essential Innovation Lab features used for the SSAI are explained below.

### How an Innovation Lab works:  Why an Innovation lab for our project

Structure & Freedom:  An Innovation Lab is an organised approach in which participants recognize and respond to a plurality of issues and concerns, structured around a specific topic area.

Participants start by being vested in their key issues – entering with their own paradigms.  A paradigm being a pattern of assumptions, concepts, values, and practices that constitutes a way of viewing reality.

As the participants learn and work together, realizing the broader impact of the issues on other participating stakeholders, an Innovation Lab fosters the freedom needed for expanding, reforming, redefining, and prioritizing the issues at hand.

Utilizing a Broad Knowledge Base:  The participant educational experience relies on garnering a substantive knowledge base, coupled with shared participants' lived experiences, and using this mutually gained knowledge to grow the participants' perceptions of the problem.

Prioritizing the Issues:  The Innovation lab then challenges the participants to prioritize the variety of issues identified through the increased knowledge base and sharing of different perspectives.

From Open Brainstorming to Working Ideas:  Continuing to work together in an iterative process of steps, exercises and subgroups, the Innovation Lab participants, together, distill the mutually recognized and prioritized challenges into manageable ideas and practical solutions.

### Pros & Cons Overview – Innovation Lab

Pros: An Innovation Lab adapts itself well to the complexity, divergent issues, and various experiences of a broader representation of key stakeholders – allowing the participants to grow together into a larger perspective of the issues.  This allows lab participants to mutually prioritize

the issues, identify the key problems, and work closely together to come up with responsive ideas and identify approaches and/or solutions.

Cons:  Available time and lab size, will naturally limit the number of issues that can be addressed and the practical ideas that are spawned.  The group needs to be large enough to represent the diversity of experiences and ideas, while not too large as to make it unwieldy – especially when running a Virtual Innovation Lab versus in-person.

Potential: That said, as lab duration is increased, allowing for more iterations of groups and solutions, and interlacing subgroups during the iterative process, prioritized issues and ideas could theoretically be refined to fully representational outcomes of the primary issues as identified and prioritized through the Innovation Lab process.

# The SSAI Innovation Lab: Collaborative Stakeholders Identifying Problems & Solutions

## Going Virtual

Complex virtual meetings may seem like old hat now.  But in the fall of 2020, it was much less familiar, and accessibility was in question.  Innovation Labs have benefitted from direct participant presence, known accessibility, in-person dynamics, personal and group interrelations, built cohesion, etc.

COVID-19 changed all this.  Concerns that had to be addressed quickly, and go virtual, were many and included:

- Participants' and facilitators' limited capacity for the new virtual meeting platform environment.

- Adjusting our facilitators' experience with the in-person Innovation Lab venue, to a new and different way of interacting, motivating, and dynamically guiding participants through the process.

- Finding optimally accessible platforms.  There was very little experience with accessibility in virtual meeting platforms and space.  We needed to meet all accessibility needs, from sensory to neuro-cognitive, to physical.

(Note:  After research, consultation and considerations, the Zoom platform was selected as optimally meeting the VIL and participants' needs.)

The virtual environment for the dynamics of an Innovation Lab is challenging to say the least.  Imagine, for example, someone that is visually impaired, using a screen-reader and concurrently getting auditory input from multiple participants, a separate chat room feed, reading one's own documents to stay on task, and receiving computer screen navigation information – all at the same time.  Now that is a challenge!

Distinct advantages of a VIL were also realized, such as no need for travel, flexible scheduling and separately scheduled group exercises.

# The SSAI Virtual Innovation Lab (VIL): Stakeholders & Processes

## The VIL Stakeholder Representational Cross-Section

VIL participants were recruited, semi-randomly, using four methods (as detailed in the Detailed Study Report).

Based on registered stakeholders, the following cross-section was achieved with the VIL – virtually the same percentages as the Public Survey:

- 38%: Animals Users/Support-Persons
- 26%: Governance, including Advisory Committee Members
- 21%: Public Services & Businesses
- 15%: Advocacy/Support Organizations.

The above VIL participation cross-section is represented in the circle graph below:
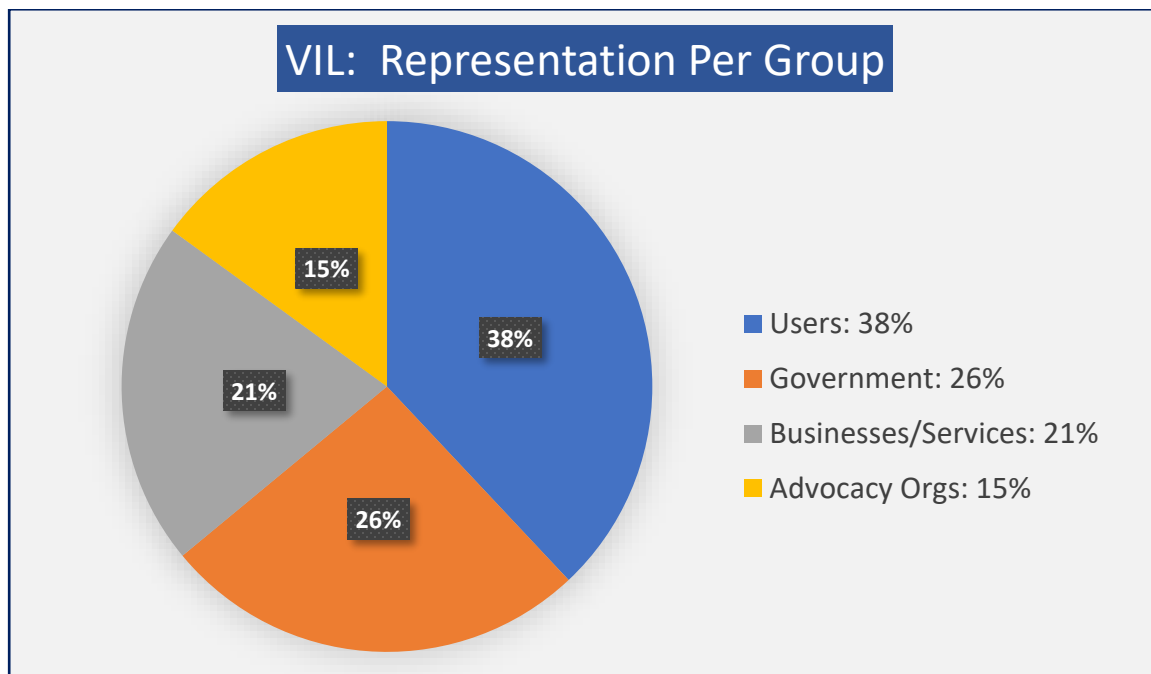


## The VIL Modular Process

The VIL was designed as a 4-step modular process that included the following half-day sessions and themes over a 6-week period:

1. Orientation.
2. Exploration and Ideation.
3. Group Homework Sessions: Building a Solution/Response Model (most groups scheduled more than one session over the 2-week period).
4. Solution Implementation Reporting.

## Polling Registrants: Prioritizing their Issues and Criteria for VIL Work

As part of the VIL registration process, each registrant was asked to identify and prioritize three areas:

1. The individual registrant's personal prioritization of perceived issues/concerns.
2. Criteria for prioritizing issues/concerns during the VIL.
3. Criteria for identifying ideas and solutions to the issues and concerns.

## Criteria for Solutions

From a list of six possible criteria, the VIL participants prioritized the following criteria with which to gauge prospective solutions:

- **Ease of understanding** by others.
- **Accessibility/Diversity**:  Does the solution increase accessibility for most or all stakeholders, or does it increase barriers for some/all?
- **Feasibility**:  Can the solution be implemented within existing systems/regulations, or require significant system changes to implement?
- **Adaptable/Flexible**:  Among a variety of applications, environments, venues, locales, etc.
- **Viability**:  Is the solution economically and/or pragmatically viable?  What does it take to implement?

## Working Sub-Groups

The VIL design used subgroups for the various steps and processes.  Registrants were assigned to one of six subgroups, each reflecting the same cross-section as the whole:

Subgroup Tasking: The VIL facilitated dynamic exercises and processes for the following task areas:

- Issues Identification & Prioritization.
- Persona Creation.
- Co-Designed Ideas/Solutions.
- Integration of each subgroup's persona, ideas, and solutions with the entire Virtual Innovation Lab group.

Many accessible resources were provided to the participants to include pre-session handouts with educational and informative PowerPoint decks and Word documents.

## Identified Issues & Challenges Data

Over 300 separate survey items were asked of the 33 VIL registrants – amounting to over 9,000 data points.  These were coupled with the over 54,000 public survey data points.  With this information, participants prioritized challenge areas and further elaborated on them through the VIL process.  These are, in order of top priority first:

- **Education/Awareness/Training** needed for Businesses, Services & the Public:  Require more training in laws, rights, interaction protocol, inclusion, animal purpose, etc.
- **Competing Rights/Access:**  Confusion is notable with understanding the various competing human rights, including those based on factors like allergies, culture, fear, untrained support animal/user behaviours – causing problems for trained animal users, the business community, and public services, etc.  Businesses and direct public-facing services have repeatedly indicated in our public survey that they do not know what can be asked of

service/support animal users re identification or authentication, and concerns exist with how best to respond when a competing human rights situation presents itself.

- **Standardized/Need for Certification/IDs**: The Need for standardized animal certifications and IDs.

- **Laws/Regulations**: Laws, regulations and their definitions are confusing, inconsistent, not inclusive enough, including what is appropriate to require for a person's needs identification.

- **Animal Confusion**: The various types, purposes, and access rights of the variety of animals now in the community is confusing.

- **Misrepresented & Untrained Animals:** Too many people are inaccurately claiming legitimacy of their animal's role and/or qualifications. There is an increase of various animals in the community which do not or cannot demonstrate appropriate behaviours around others, causing distraction and potential safety risks. Despite some protection under the Ontario Human Rights Code (OHRC) for untrained support animals, criteria to certify the user's need is provided in the OHRC. Additionally, issues around behaviours, health and safety that impact the rights of others, would cause inherent competing rights concerns. Easy availability of unsubstantiated online IDs, Certs, & Apparel is a significant contributor to the issue.

(Note: The complete list of 11 issues, identified and prioritized through the VIL process, is available in the Detailed Study Report Appendix, to include the percentage rating for each.)

## SSAI Virtual Innovation Lab by Design: 6 Groups – 6 Recommendations

Using the dynamics and cross-stakeholder representation inherent to each VIL subgroup, each group was fostered to develop, independently and iteratively, the following four outcomes:

- A Persona: Based on the key stakeholder groups, a realistic, multi-faceted person with a detailed background, personal concerns and issues, by whom realistic challenges are faced.

- Challenges/Issues: A realistic detailed problem (or associated multiple problems) that the above persona faces. (Based on the six prioritized issues/challenges list).

- Ideas/Solutions: By applying the five gauging criteria, ideas for solutions were created and developed further within each group, into a workable solution.

- Detailed Response: A fully developed, marketable and implementable response, which could include multiple resources, a marketing/awareness plan, and implementation needs, was presented by each group.

## Limitations and Benefits – Balancing the VIL Outcomes

Limitations include:

- Practical Time: Too long and we lose people. Too short and we don't accomplish our objectives.

- **Time to Fruition**: Independently developed ideas by each sub-group led to a notable overlap of similar challenge selection. If additional time could be spent, a next level of main group and subgroup iteration process(es) could occur with the intention of further diversifying the VIL results.

Advantages to having overlapping challenge/response areas, include:

- **Shared Priorities**: Separate development with similarly chosen challenges indicate a cross-stakeholder shared level of issues prioritization.

- **Broader Programs**: Dovetailing efforts, covering similar issues but with differently identified personas, means a broader-scoped community response can be developed. Efforts could be harmonized and concurrently address and engage wider members of a community through one concerted program.

## The Six VIL Solution Ideas

Each of the following solutions included a detailed challenge description; response/proposed concept; issues addressed; and a list of who benefits. Below is the title of each proposed solution, followed by a descriptive statement:

**1. "Learning Together"** – Developing Community-Based Resources & Training for Small Businesses and the Community.

**2. "Quest4Inclusion"** – A public awareness and education campaign that uses a service animal as the "storyteller" and provider of the message, while also ensuring there is a link with the handler and their disability – "A Day in the Life of…"

**3. Standardized Emotional Support Animal Recognition** – Establish standards, measurements, and oversight for a harmonized emotional support animal (ESA) identification process, with universally accessible ID card.
(**Note**: Ontario regulations do not use the term "Emotional Support Animal". The term that is used Provincially is "Service Animal". And though they can be untrained, public access still requires a regulated health professional's documentation for the user's need.)

**4. "Creating the Buzz"** – Creating standardized learning materials that are simple and easy to understand and reference – especially geared toward "main street".

**5. "Eyes Forward"** – Mandatory training for all staff of businesses/services that provide front-facing services to public.

**6. "Carefree Travel App"** – A smartphone/tablet app designed to aid persons travelling with service/support animals providing one source for resources, guidance, directions, tips, and mandatory requirements, per jurisdictions, and based on the person's planned itinerary – improving the traveller's experience.

## Participant Feedback on the VIL

An online survey was designed to anonymously garner constructive feedback from the VIL participants. Twenty-three, 23, of the 33 VIL participants provided feedback via the survey. This feedback indicated:

- A majority of positive feedback provided validity to the SSAI as a qualitative-based study.

- The greater part of the respondents viewed the process as inclusive, engaging, fair, representative of various viewpoints, and pertinent to the issues.

- Most recognized the ability to learn from others and gain a bigger, more inclusive picture.

(Please refer to the Detailed Study Report for assessment details and statistical responses.)

In addition to the scaled items, participants were asked to provide written feedback. Much was offered. Sampled positive feedback included:

- "This was a great lab and has laid some amazing groundwork for possible solutions to an issue that has existed for a while now"

- "I had just taken a course on Human Centered Design or Design Thinking, so it was great to see this practice put to use."

- "Breaking off into smaller groups and having a wide variety of perspectives and people of different backgrounds with different needs."

- "It was great to work with people from all experiences and to learn from them. Lots of great ideas were shared in a respectful way"; "Collaborative, gained valuable insights from other participants."

Sampled constructive feedback included:

- "It was great for time as time is something so sacred anymore, however [I] feel it would have been beneficial to maybe have a couple more weeks to actually hash out the ideas in totality."

- "I just felt the time commitment was a bit too much. I was pressed for time at work and maybe it was just the timing of when they were scheduled."

- "Our goal of the sessions is what was unclear. But once in the smaller sessions it became clear and well directed. There were questions about what next steps would be. Perhaps in the beginning, going through the steps a little more clearly and explaining the short and long-term goals would make it easier."

## More Stakeholder Review of the VIL Outcomes & Recommendations

A founding principle for developing qualitative studies is the use of multiple data sources. These are used to triangulate for validity of measured outcomes. Having the 33 VIL participants working closely together, despite applying a variety of separate iterative processes, could lead to an inherent or "academic" bias developing within the group as a whole.

A secondary, independent group of stakeholders was engaged, reflecting the same stakeholder cross-section as both the VIL participants and Public Survey respondents, (with similar semi-random recruiting methods).

The secondary consultation group was provided a new detailed report and online survey. The report covered areas such as the SSAI project review and Innovation Lab concepts. It also covered:

- Identified and Prioritized issues from the VIL.
- The criteria used for processing the VIL recommendations
- Detailed VIL Outcomes – including details for each of the six VIL responses.

The survey was designed for use by the respondents after they read the provided report.  The survey was presented in the same format as the previous two surveys, using response statements and providing a Likert-based scale as in the following example:

"The VIL was able to address the complexity and depth of the identified issues and challenges.":

1. Strongly Disagree; 2. Disagree; 3. Neutral or Undecided; 4. Agree; 5. Strongly Agree; N/A)

The areas covered by the survey response items included:

- Critique (positive or constructive) of the VIL structure, criteria & process, as introduced in the report.
- How might you differently identify or prioritize the issues addressed.
- Rate the 6 VIL solution models for how well they meet the identified criteria (e.g., accessibility, ease of understanding, feasibility, etc.), as well as your overall favourability rating and why.

Stakeholder Representation:

**Circle Graph:  Secondary Consultation Group Cross-Section**
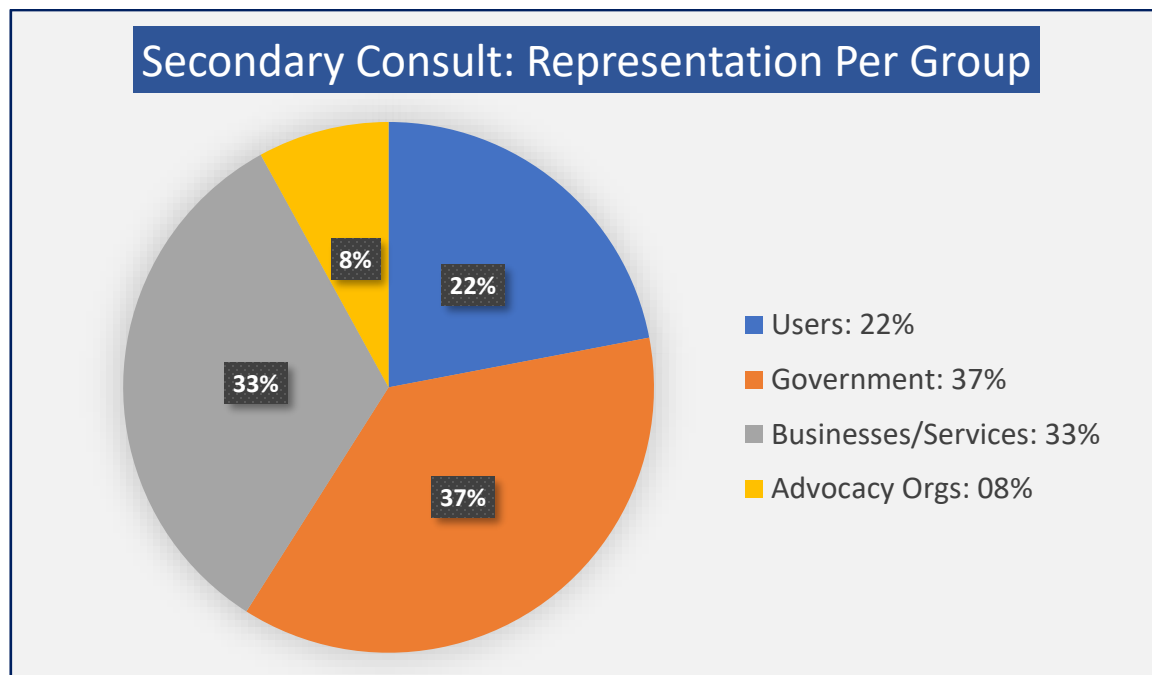
As shown in the above graph, among the four stakeholder groups, representation for the Secondary VIL Consultation was as follows:

- Service & Support Animal Users:  22%

- Governance:  37%

- Businesses and Public Services:  33%*

- Advocacy and Animal Training:  8%

*This shows a targeted increase in Businesses/Services from the VIL.  VIL Business participants had a lower ratio and the authors wanted secondary input to reflect a greater representation from this group.

## Summary Tables:  Secondary Consultation Responses

Below are two tables which summarize the input provided by the secondary consultation respondents.

**Table: Critique of the VIL structure, criteria, process, and contents:**

| Area | Agree | Strongly Agree | Total |
|---|---|---|---|
| Key/Divergent Stakeholders are Represented | 30% | 57% | **87%** |
| Organized for Collaborative Input & Processes | 22% | 65% | **87%** |
| Addresses Complexity & Depth of Identified Issues | 30% | 52% | **82%** |
| Agree with the top 5 criteria for VIL solution development (Yes/No) | N/A | N/A | **100%** |
| Agree with the 6 Prioritized Issues (Yes/No) | N/A | N/A | **82%** |
| Total | 37% | 58% | **88%** |

**Table:  Rating of the six proposed ideas/solutions for relevance and effectiveness:**

| Solution/Idea | Relevance | Effectiveness |
|---|---|---|
| "**Learning Together**" – Community-Based Resources & Training for Small Businesses and the Community. | 96% | 96% |
| "**Quest4Inclusion**" – A public awareness/education campaign – service animal as "storyteller" and provider of the message. | 82% | 95% |
| **Standardized Emotional Support Animal Recognition** – Establish standards, measurements, and oversight for a harmonized emotional support animal (ESA) ID process & card. | 87% | 83% |

| Solution/Idea | Relevance | Effectiveness |
|---|---|---|
| **"Creating the Buzz"** – Creating standardized learning materials that are simple and easy to understand and reference. | 91% | 87% |
| **"Eyes Forward"** – Mandatory training for all staff of businesses/services that provide front-facing services to public. | 92% | 86% |
| **"Carefree Travel App"** – Smartphone/Tablet app to aid persons travelling with service/support animals. Provides one source for resources, guidance, directions, tips, & mandatory requirements, per jurisdiction. Based on the person's planned itinerary – improving the traveller's experience | 77% | 68% |

Additional detail was gathered individually rating the six ideas for each of the 5 development criteria, (Ease of Understanding; Accessibility/Diversity; Feasibility; Adaptability/Flexibility; Viability).

Overall, the secondary consultative results were notably positive, strongly supporting the validity of the VIL process and SSAI project.

## Written Responses for Issues

Opportunity for additional written responses was offered resulting in 36 responses.  A representational selection is provided below:

- "Enforcement would make my top 6, without it the rest of the work could be in vain."
- "I would replace the need for ID's and certification with education of how to recognize a properly trained service animal, as certifications and ID issuing can be biased based on breed."
- "Have a focus on communication. The success of the outcomes will depend on a robust communication plan to all stakeholders!"
- "We need standardized service animal signage in widespread use."
- "Education over regulation. I firmly believe that the problem with our current system is a lack of understanding and that the information can be hard to find."
- "Great work! Great initiative! Like other social progress and innovations using this type of thoughtful engagement and setting the ultimate approach as wide as we can, will produce strong foundation moving forward."
- "Scrap the ESA certification. The province of Ontario specifically does not need a separate distinction process for service animals and ESA's. If someone with a disability requires their animal for this work, they are able to get a doctor's note for the animal that would grant them access."

## More Study Focus:  Stakeholder Concerns Around Animal Training/Availability

Through three specific response items in the SSAI Public Survey, respondents revealed the following concerns related to availability and training of service and support animals:

1. Survey Item: "I am concerned with readily available online "fake" registration, certification, identity products, etc."

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 14% | 61% | 75% |
| Governance | 34% | 30% | 64% |
| Public Businesses, Organizations, Services | 31% | 13% | 44% |
| Advocacy / Training | 29% | 54% | 83% |
| All 4 Groups (Average) | 26% | 40% | 66% |

Note:  The term "fake", though controversial for some, is commonly used among the stakeholder groups, and the authors felt it was important to keep statements concise and relevant.  For respondents who have not agreed with this term or a condition it represents, additional clarifying survey items allowed this to be captured, without bias.

2. Survey Item: I/We have concerns, ". . . about the difficulty to attain certifiably trained animals for legitimate needs, because availability levels are not meeting the volume of needs."

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 27% | 34% | 61% |
| Governance | 36% | 13% | 49% |
| Public Businesses, Organizations, Services | 35% | 4% | 39% |
| Advocacy / Training | 37% | 33% | 70% |
| All 4 Groups (Average) | 33% | 21% | 54% |

3. Survey Item: I/We have concerns, ". . . about sub-par training for service and support animals by non-certified trainers, friends, owners."

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 25% | 35% | 60% |
| Governance | 41% | 16% | 57% |
| Public Businesses, Organizations, Services | 40% | 10% | 50% |
| Advocacy /Training | 33% | 33% | 66% |
| All 4 Groups (Average) | 34% | 24% | 58% |

Based on the above response data, a significant level of concern is indicated around the training and availability of service/support animals in the community.  An average of the three tables above comes to 61%.

# Additional Focus: The Federal and Provincial Regulatory Environment

## Expressed Concerns by Stakeholders re the Regulatory Environment

The SSAI Public Survey provided four issue-related statements for each of the four stakeholder groups to respond re the regulatory environment. Below are the four statements, followed by the table under each statement. The tables show the totals and averages of concerned responses, by each stakeholder group. (Concerned responses would be those under "Agree" or "Strongly Agree".)

**1. "Provincial/Federal-based regulations & requirements are confusing, inconsistent or cause conflicts."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 34% | 22% | **56%** |
| Governance | 26% | 18% | **44%** |
| Public Businesses, Organizations, Services | 18% | 6% | **24%** |
| Advocacy /Training | 10% | 31% | **41%** |
| All 4 Groups (Average) | 22% | 19% | **41%** |

**2. "Policies and procedures of transportation carriers (e.g., airlines, trains, buses, public transportation) for service/support animals seem inconsistent or change too often."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 34% | 28% | **62%** |
| Governance | 35% | 8% | **43%** |
| Public Businesses, Organizations, Services | 25% | 4% | **29%** |
| Advocacy /Training | 34% | 31% | **65%** |
| All 4 Groups (Average) | 32% | 18% | **50%** |

**3. "I am challenged or confused with the Competing Rights of others, (e.g., animal allergies, fear, lack of acceptance, cultural/religious) when it comes to animal access."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 37% | 14% | **51%** |
| Governance | 48% | 8% | **56%** |
| Public Businesses, Organizations, Services | 43% | 6% | **49%** |
| Advocacy /Training | 31% | 14% | **45%** |
| All 4 Groups (Average) | 40% | 11% | **51%** |

**4. (Intersection of Emerging Issues and Regulations) "The increase of so many different animals now in the community, makes the Human Rights Code more difficult to interpret/apply."**

| Group | Agree | Strongly Agree | Total |
|---|---|---|---|
| Animal Users | 31% | 20% | **51%** |
| Governance | 39% | 5% | **44%** |
| Public Businesses, Organizations, Services | 44% | 8% | **52%** |
| Advocacy /Training | 39% | 39% | **78%** |
| All 4 Groups (Average) | 38% | 18% | **56%** |

## The Regulatory Environment: Discussion

The following discussion may help us understand why such stakeholder concerns exist.

Both federal and provincial regulations have developed, generally, to protect the rights of individuals, including for their access and safety.  This includes the rights of service/support animal users, as well as elements intended for recognizing and protecting the needs of the general public.

The authors studied the notable content of both federal and various provincial laws and regulations (as well as a sampling of municipal-based regulations and bylaws, and related service provider policies and procedures, e.g., Air Canada, VIA Rail, etc.).

On the Canadian Federal level, laws and regulations that have jurisdiction over service/support animals and users, in just the travel sector alone, amount to over 12 separate federal acts, laws, regulations, and codes of practice – generally referred to, in this report, as "regulations".  In a detailed compare/contrast exercise among the federal regulations, it was common to find notable overlaps, contradictions, and confusion among their various contents.

Couple the fact that many regulations also exist under each of Canada's 10 provincial jurisdictions, plus territory-based regulations.  It was found that a traveller, across provinces, with a service/support animal, can encounter from between 22 to 28 pertinent regulations and policies, depending on the type of animal and the number of provinces they travelled.  It was common to discover overlaps, conflicts, and confusions among the federal and provincial regulations.  Challenges can occur when a service/support animal user travels from one provincial jurisdiction, to another province with differing regulations.

Also, regulations can quickly and notably change.  For example, during a one-month period in early 2021, due to changing federal regulatory content, major Canadian airlines, went from previously accepting "emotional support animals" in the cabin, to only accepting "emotional support dogs", to initiating extensive documentation requirements, and ultimately to not allow any emotional support animal or dog in the cabin, except as pets, and subject to the policies and procedures for pets only (e.g., caging, additional fees, etc.).

The conditions discussed in this section can make it untenable for service/support animal users to join in the community with a reasonable degree of legal/regulatory awareness and confidence – potentially impeding their independence versus supporting it – not to mention the service/support animal user's loss of spontaneous travel that most people without these animals enjoy.

## Applicable Federal and Ontario Regulations

The following categories are offered as primary regulatory areas:

- Human Rights.
- Accessibility/Disability Related.
- Transportation/Travel.
- Specific Disability/Need (e.g., Ontario Blind Person's Act; Ontario Guide Dog Regulations).

The specific regulations applicable to service and support animals in the above categories include:

1. Accessible Canada Act
2. Canadian Human Rights Act
3. Accessible Transportation for Persons with Disabilities Regulations – SOR/2019-244 (Canada)
4. Personnel Training for the Assistance of Persons with Disabilities Regulations – SOR/94-42 (Canada)
5. Passenger Terminal Accessibility – Code of Practice (Canada)
6. Aircraft Accessibility for Persons with Disabilities – Code of Practice (Canada)
7. Passenger Rail Car Accessibility and Terms and Conditions of Carriage by Rail of Persons with Disabilities – Code of Practice (Canada; Rail)
8. Canadian Air Transport Security Authority
9. Accessibility for Ontarians with Disabilities Act
10. Ontario Integrated Accessibility Standards Regulation O. Reg. 191/11
11. Ontario Human Rights Code
12. Ontario Blind Persons' Rights Act
13. Ontario Guide Dog Regulations – R.R.O. 1990, Regulation 58

## Applicable Rules & Regulations – Details & Comparisons

A detailed comparative table is provided in Detailed Study Report Appendix that covers the 13 federal and provincial regulations. Despite that the table is only an overview of the regulatory environment, it is full and complex.

Of notable concern, is the different use of the terms "dog" and "animal" among the eight regulations that use these to specify animal types. The regulations also vary notably in terms of required training and certification levels of the service/support animals covered.

## Important Ontario Discussion

In the area of animal type and training levels, **Ontario is notably unique**. The Ontario Human Rights Code (OHRC) specifies that, "Service animals for people with psychiatric disabilities or addictions **do not have to be trained or certified by a recognized disability-related organization**" [emphasis added]. This appears to be often used to define Emotional Support Animals (ESAs) and vindicate their users' rights in public – essentially, that any type of animal, for any personal need, even with zero training (including training that would be beneficial in appropriate and safe behaviours in public), is allowed full community access rights.

The OHRC and the Ontario Integrated Accessibility Standards (OIAS) do require the users of the stipulated service animals to attain (and understood to provide if requested) a document from one of nine Ontario regulated health professionals, indicating their need for an animal.

## Resource Tool Provided in Detailed Study Report Appendix

To help simplify the extensive comparative table, in the Appendix, of the Detailed Study Report, a simpler resource tool is further provided in a later Appendix.  It is named: "Comparison Tool: Table of Regulations by Feature: Federal, Provincial, & Municipal".  This table allows a cross-reference visual search for specific regulatory <u>features</u>, such as definitions, identifications requirements, behavioural expectations, etc.

# Stacking up the Numbers

## Issues Prioritization

As reported, four issue areas were initially identified, then expanded, and used as part of all stakeholder engagement processes (i.e., 1. Regulations, Policies & Procedures; 2. Emerging Issues/Problems; 3. Systemic/Practical Concerns; 4. Education/Awareness & Public Service).  With approximately 45 survey response items created for each stakeholder group, coupled with the total number of completed surveys, this has resulted in over 54,000 data points from the entire Public Survey.  A table is provided at the end of this section which represents the prioritization of the four issue categories, based on Public Survey data.

## Public Survey and VIL Prioritizations Compared

The prioritization of issues generated from the Public Survey results was attained differently from the prioritization of issues achieved through the Virtual Innovation Lab (VIL).  For the VIL, each registrant was asked to directly prioritize a list of issues, as garnered from the Public Survey, and further developed through the VIL.  The VIL prioritization resulted in an issue list with more detailed descriptors of each identified issue.

## Issues Prioritized through the Public Survey

Public Survey issues prioritization was attained differently from the Virtual Innovation Lab (VIL).  Issue prioritization at the Public Survey level was calculated mathematically, using all the responses to the individual items in the survey.  It was intentional, to clarify where the larger number of Public Survey participants **anonymously** saw issues.

**Adjustments for Skewing\*\***: Some adjustments were made for the table at the end of this section, to reduce skewing of the results.  Specifically:

- **Education/Awareness & Public Service:**  Participants from the Users and Advocacy/Animal-Training groups are, in a sense, most directly affected by the training and education performance of the other two groups – i.e., Governance, and Businesses/Services.

  Users, and Advocacy/Animal-Training respondents were asked to consider their experiences when interacting with the other two groups (Governance, and Businesses/Services).  Because Governance, and Business/Services groups do not typically receive direct services from

stakeholders of the Users, and Advocacy/Animal-Training groups, it would not make sense to ask the former to consider training from the latter.

However, it would be helpful to know what the Governance, and Business/Services stakeholders perceive as the quality of education, training, and awareness in their own communities, especially in consideration of their direct functions and services.

Interestingly, each community group (either Governance or Businesses and Public Services) assessed their own level of performance as much better than the other group.  Additionally, both groups considered their education, training, and awareness significantly better than what stakeholders thought from the Users and Advocacy/Animal-Training groups.

In other words:  When self-assessing, the results show up notably more favourable than when being assessed by the other stakeholders.  To reduce this skewing, the results in the table below were separated among individual groups and all groups.  The skewing is obvious when comparing rankings 1 with rankings 5 and 6.

- **Regulations Policies & Procedures:** These results were being skewed by one survey item about the qualifications of Ontario Regulated Health Professionals to determine the need of an individual for a service/support animal.  All other survey items in this category were more general about the environments and effects of regulations. The skewing effect was removed, so the results were more representative of the issue area as a whole.

**Table:**  The results of Public Survey issues category prioritization, adjusted for skewing, are represented in the following table:

| Ranking | Issue Category | Issue Percentage (%) |
|---|---|---|
| 1 | Education/Awareness & Public Service (**As identified by Users and Advocacy/Animal-Training stakeholders' perception of Government, Businesses, Public Services performance.) | 64% |
| 2 | Emerging Issues/Problems | 61% |
| 3 | Systemic/Practical Concerns | 54% |
| 4 | Regulations, Policies & Procedures | 51% |
| (5) | Education/Awareness & Public Service (Average of all four stakeholder group responses in this category – Not adjusted for skewing.) | 38% |
| (6) | Education/Awareness & Public Service (**Average of Governance, Businesses, Public Services perception of themselves.) | 13% |

# Responding to Stakeholders

## Stakeholder Input Leads to Issue Prioritization

Thank you to everyone who participated by responding to our Public Survey and working deliberatively in the Virtual Innovation Lab.  The generous stakeholder input we received throughout this project has told us many things.  The most important point is that no single issue, concern, or idea is limited to affecting only one group.  Something that affects one group, affects all groups.  For example, confusion with laws and regulations around access rights, can make it more challenging for business owners.  In turn, that confusion will likely create access barriers for users of service and support animals.  It would be a win-win situation to address shared issue areas to make solutions for everyone.

We prioritized our recommendations based on two measurable criteria:

- The percentage of issue recognition by all stakeholders.
- The degree an issue is shared across stakeholder groups.

## Five Recommendations Based on the SSAI Work

Below are a set of five tables with key recommendations (one per table), grounded in the above criteria: 1) Issue recognition and 2) Shared issues.  These recommendations are based wholly on:

- The data received by over 350 public survey respondents.
- Data received through the Virtual Innovation Lab (VIL) survey.
- Content developed through the VIL dynamics and cross-stakeholder engagement.
- Responses to the VIL Secondary Consultation.
- Additional information and knowledgebase garnered through the entire SSAI process.

The following recommendations take a holistic approach.  They combine aspects of more than one issue and more than one stakeholder group.  They also use multiple community and stakeholder resources – creating a partnered or collaborative approach for each recommendation.

**Table – Issue 1:**  More Training & awareness is needed for businesses, services and public.

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| Provide core training for businesses & services, through municipalities, designed with stakeholders to include:<br>• Types of service/support animals.<br>• Rights for community access of users with their service/support animals. | • Develop a target/recruitment program to draw in businesses/services.  Include business/service venues that support ESL and indigenous clientele.<br>• Use recognized organizations such as Boards of Trade, Community Centres, Welcome Centres, | • Municipal (Lead)<br>• Businesses & Services (Target) | • Businesses & Services<br>• Municipalities<br>• Users<br>• Support Orgs |

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| • Others' Rights related to above.<br>• How to respond to your customers/clients with concerns/questions.<br>• How to identify a legitimate service/support animal in your premises.<br>• Basic De-Escalation Skills<br>• Where to go for help with questions/issues. | Indigenous Canadian Centres, etc. to promote the program and talk with constituents about their needs.<br>• Post-Training: Provide signage to the business/service as trained in service/support animal access. | | |

**Table – Issue 2:**  More community outreach and awareness are needed for the public.

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| Provide a facilitated public awareness campaign through municipalities, designed with stakeholders to include:<br><br>• The story behind animal supports.<br>• Types of service/support animals.<br>• Service/Support Animal Users' Rights and access needs.<br>• "Your Rights"<br>• Not everyone looks like they need an animal.<br>• Appropriate animal and user behaviour & responsibilities.<br>• Appropriate public behaviours around animal users and their animals. | • Use multiple forms of media and communications (e.g., posters, brochures, online information/resources, social media, etc.).<br>• Hold online <u>and</u> in-person events – one venue does not replace the other – especially in closer-knit communities.<br>• Collaborate with cultural community centres, other community centres, Immigration Welcome Centres, Indigenous Canadian Centres, etc.<br>• Provide information in common other languages used in your community. | • Municipal (Lead)<br>• Community-Based Organizations (Partners)<br>• Public/Resi-ents (Target) | • Public<br>• Municipalities<br>• Users<br>• Support Orgs |

**Table – Issue 3:** The increase in numbers and types of animals in the community is confusing. Some people may not have verifiable animal needs.

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| Provide Municipal-based, easily identified tags or other simple IDs/indicators. This may be a different colour license tag. Or, it may be similar to the Ottawa OC Transpo ID card. | • Any type of special ID will require an accessible, reasonable process for users to attain it.<br>• A municipal-base ID process needs to clearly not impede or override existing certification/ID processes, such as provided through accredited service dog training schools. They may be used to help the process.<br>• A QR code system may be considered if this adds confidentiality to the process and possibly make it easier to use.<br>• The ID and process would need to be covered in the public awareness campaigns, and Business/Services Training program. | • Municipal (Lead)<br>• Users (Partner)<br>• Businesses & Services (Partner)<br>• Local Transit (Partner) | • Users<br>• Businesses & Services<br>• Municipalities |

**Table – Issue 4:** Provincial/Federal-based regulations & requirements are confusing, inconsistent or cause conflicts.

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| Provincial Government & Municipalities partner to provide education on laws and regulations that impact the area of community access for persons with service/support animals. Areas to include:<br>• Overview of federal regulations & jurisdictions.<br>• More detailed coverage for each Provincial (Ontario) regulation. | • Content should be accurately detailed, but without appearing it is more for lawyers than stakeholders – Make it user-friendly.<br>• Provide plenty of time for discussion.<br>• Attempt to minimize the presence of special interest groups – Produce a fair process for all stakeholders. | • Municipal (Co-Lead)<br>• Province (Co-Lead)<br>• Users (Full partner) | • Users<br>• Businesses & Services<br>• Municipalities<br>• Province |

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| • Areas of confusion.<br>• Overlaps with other regulations, including federal.<br>• Contradiction with other regulations.<br>• Human Rights content, processes, and competing human rights.<br>• Examples of Municipal bylaws designed to help. | • Use the events as a public consultation process to address shared issues. It may also be used to help guide potential revisions to existing laws.<br>• Have a way attendees can feel there are clear avenues for resolution where possible.<br>• Outreach: Leverage partnerships and community outreach venues from previous recommendation tables. | | |

**Table – Issue 5:** It is a challenge to reach into the deeper levels of "main street", cultural and other local communities, newcomers, persons with English as a Second Language (ESL), etc. when implementing training, awareness, and knowledgebase education content.

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| Create a dynamic partnered public education/awareness approach, using multiple community organizations/resources to:<br>• Identify target groups for needs<br>• Identify existing barriers, especially those not being addressed.<br>• Use multiple, trusted, and familiar organizations and individuals to produce meaningful and appropriate content.<br>• Use these same resources to design and implement a marketing or "reaching-out" program. | • Materials can be developed through recommendations 1, 2, & 3, above, while adding back to their content based on more community-based collaborative approaches.<br>• Materials can be produced in modules that can be shared with:<br>  o Other municipalities<br>  o The Province<br>  o Community-based organizations | • Municipal (Lead)<br>• Community-Based Organizations (Partners & Co-Lead)<br>• Public & Residents (Target) | All groups benefit:<br>• Public<br>• Municipalities<br>• Users<br>• Support Orgs |

| Recommendation/Idea | Considerations | Group Partners | Groups that Benefit |
|---|---|---|---|
| • Use community-based venues (small businesses, cultural community centres, Welcome/Newcomer Centres, Indigenous-based organizations, etc.).<br>• Foster open dialogue time to address issues together.<br>• Provide flexible content which can be adjusted to targeted groups, in-person sessions, online venues, social media, and include printed resources as needed. | | | |

## We're Back: A Post-Covid & Pandemic World

We all know the Covid experience has turned our lives completely around and upside down.  This was discussed early in the SSAI project.  But the Public Survey was designed and completed early in the Covid experience.  There were not yet enough patterns to draw on.  In retrospect, we have heard from stakeholders that they felt the Province's and Federal response had left service and support animal users hanging, especially around getting newly trained animal partners.  This process was essentially at a standstill, leaving many people in limbo, that needed an animal to keep what part of a regular life was possible.

But we can now turn to the reopening of our communities and considerations around it.

## Communities Reopening after Covid

Naturally, the impact of Covid on the lives of people who rely on service and support animals would have some different dynamics than others in the community.  However, as reflected in our approach to recommendations, all stakeholders' experiences affect all others.  This can be especially so, in ways, among the Users, and the Business/Services groups.  Please consider the following:

- Service and Support Animals would have lost some skills and need to be worked some to bring them up to pre-covid abilities.
- The Users of service and support animals may have lost confidence, and some interactive skills required to work in public in the community with their animal.
- Levels of mental health challenges have increased among the general population, including anxiety and depression.  Think of the following:
  - This is doubly concerning for people that have service animals for mental health supports, being at risk of worsening symptoms.
  - Store and restaurant owners have watched their businesses collapse and have been worried about their future, while also experiencing increased issues of anxiety.

- These business owners are likely quite concerned around getting their businesses restarted, while also concerned for the health of their customers, staff and their own health.

## Exercise – Consider the following scenario:

The following story illustrates challenges that both users and businesses may well be experiencing as we return to our communities – hoping the more personal perspective helps us all understand better.

Jamal uses a service animal for his mental health needs – he is diagnosed with an anxiety disorder. His need for an animal is agreed among his health providers.  A document was co-signed by Jamal's Psychiatrist and Occupational Therapist stating his needs and recommending he be allowed in public with his service animal.  Jamal obtained a dog, "Porter", with basic obedience training, and training in appropriate behaviours in public (e.g., lay on the floor while Jamal is eating; being relieved in appropriate places; focusing more on Jamal in a public setting than others; appropriate behaviour around other dogs; etc.).  Porter does not wear any identifying service animal gear.  It is not required because Jamal has his health professional letter.  Also, Jamal does not like receiving increased attention to himself.  He has also felt it was not appropriate to spend money online for service dog identification gear.

Jamal has never been comfortable with needing documentation to have his service animal with him.  The thought of being asked by someone, for his health professional's document increased Jamal's anxiety and feelings of anger.

Earlier in the day, Jamal quarrelled with his partner, literally over spilt milk.  Both Jamal and his partner had been stuck at home during Covid.  Jamal had been out of work and his partner working virtually, part-time.  During the quarrel, Jamal left their home upset.  He decided to go to a local restaurant for the first time since the community was reopening.  He had been to this restaurant before Covid.  In his haste, Jamal had forgotten to take his Psychiatrist and Occupational Therapist document showing his need for a service animal.

Jamal sat at a table in the back corner awaiting service.  Porter was out of practice and standing by the table, sometimes trying to interact with others, and looking for food on the floor.

George, the restaurant owner was bothered by Porter's behaviour.  He was also concerned for his other customers' reactions – some being uncomfortable with Porter milling about.  When Jamal had come to the restaurant before Covid, Porter was much better behaved.  George did not know then about dog user rights to be in the restaurant.  Then, George thought it best to let Jamal and Porter discreetly stay at their back corner table.  George was not comfortable at that time with what else to do about it.

Since Covid, George's city offered online workshops on service and support animals.  He learned that a person with a service and support animal is required to have a document from their doctor or one of nine health professionals.  Given George's discomfort with Jamal and Porter being in the restaurant, plus Porter's increased behaviours, George decided to ask for Jamal's document.  George was very anxious about his restaurant's reopening and for his other customer's reactions.

George reluctantly went to ask for Jamal's document.  Both were anxious.  Jamal then realized he forgot the document, and resented being asked for it as it was.  Jamal declined to show George a

document.  After several attempts, with emotions escalating, George told Jamal that he had to leave.  Jamal refused.  Two restaurant staff, strong looking men, came and asked Jamal to leave.  When he refused again, the two men physically forced Jamal out of the restaurant.

**Considerations:**

- Would the situation have had a much better ending if it were not already charged with emotions related to Covid?
- Might George have left Jamal and Porter alone to stay if Porter was behaving more appropriately?
- Might Jamal handle the document situation differently if he had an opportunity to discuss his feelings with his Occupational Therapist?
- What if the city workshop provided some helpful ways for store owners in how to engage customers about their animals?  This could have included basic de-escalation skill coverage.
- Might Jamal have left with less commotion if George had discreetly engaged the police, and the police be skilled at recognizing possible mental health challenges and practicing de-escalation?  Would it have been further helpful if the police were knowledgeable about the rights and types of service/support animal users?

## Emerging, Continued & Complex Issues: More Work is Needed

Many issues have been identified by this project.  These include emerging and newer issues as well as long-standing ones.  The SSAI stakeholder engagement, co-design approach, and analysis methods, qualify and obligate the SSAI to report on all identified issues.

The issues detailed in this section go beyond the current SSAI scope and methods to resolve.  Still, the issues are presented with detailed background and treatment to hopefully generate further discussion and future efforts.

The hearts and minds of many stakeholders have generously contributed to this content.  It is our recommendation that the SSAI work is used as a platform from which others step forward and begin working on these complex concerns.  A stand-alone report with the content of this section in greater detail will become available for reference by all stakeholders.  It also contains suggestions in how to pursue resolution more successfully with these tough issues.

For long-standing, complex, and historically charged issues, additional professional assistance in problem solving, dispute management, de-escalation, conflict resolution, negotiations, etc., are highly recommended to be a core part of the process.  These facilitative supports should be budgeted and introduced before the project is implemented.

### Quantity & Quality of Different Regulations (Federal, Provincial, Municipal)

**Issue:**  Many regulations (i.e., Acts, Laws, Regulations, Codes of Practice, Bylaws, etc.) can be confusing, ambiguous, and have conflicting content with other regulations.  Some regulations have created conflict within the regulation (such as the Ontario Human Rights Code re competing rights).

This project study identified over 13 separate Canadian Federal and Ontario Provincial regulations that affect persons using service and support animals in the community.

It is interesting to note, among many inconsistencies within the various regulations, that:

- Definitions of a service animal vary widely.

- Some definitions are recognized by stakeholders as vague and/or ambiguous.

- Others cover only dogs; others use only the term "animal", while others address both dogs and animals, sometimes inconsistently.

- Those that cover dogs only, in some provinces, require certification and identification that is unique to their province. This could create a risk of excluding travellers with certification from other provinces. It could also cause additional hurdles for users to work through.

- Other regulations that rely on definitions of disability as evidence of need for a service animal, can tend to omit specific service types. This appears to be the case in Ontario where different applicable disabilities are covered under separate regulations. By not providing a single, clear, and complete source of disabilities, some service areas can also be omitted.

- Travel-based regulation and carrier policies have changed dramatically in a notably short period of time.

## Divisions Among Animal User Stakeholders

**Issue:** Divisions among animal users and groups have been shared and observed during the SSAI. Key conflict areas include:

- Nationally Standardized Training & Certification for all Service Animals, versus Individual Training Certification by Service Type.

- Some "Service" Animals, including those designated by Ontario regulations as not requiring training, can be distracting, while some behaviours can be a safety or functional risk for others.

- "Emotional Support Animals" ("ESAs"), are not recognized by that term in Ontario regulations. However, the ESA term is pervasive, confusing, and the animals' increased presence can increase risks for persons who rely heavily on highly trained service dogs. Proponents for ESAs believe they should have full access rights for their use of untrained and various animals.

### Standardized/Universal Certification vs. Separate Certification by Service Type

There are ongoing efforts to standardize, make universal training standards and certification processes that would cover all service animal types. This effort is faced with opposition by some already covered by longer-standing training and performance standards that have a recognized position.

Some see advantages to a national certification/identification, including for regulatory and policy procedures. Other concerns have been shared that the existing standards currently covering some specific animal-based services could be compromised.

It appears that differing perspectives may be going down separate paths – away from working with each other. Unfortunately, if unresolved, this could create seemingly untenable conditions.

In the spirit and practice of the SSAI, engaging all Stakeholders, including those with differing perspectives, it is recommended that:

- This issue be recognized as serious and real.

- All responsible parties find ways to come to the table for development.

- Recommendations be considered from the section's introduction and detailed further in the Detailed Study Report.  One key consideration would be that independent professional assistance in problem solving, de-escalation, negotiations, conflict resolution, dispute management, etc., be a core part of the budgeted process.

### Service Animals with no training required, can be distracting, while some behaviours can be a safety or functional risk for others.

In Ontario, per the Ontario Human Rights Code (OHRC) (under, "Preventing discrimination based on mental health disabilities and addictions"), in Section 13, "Duty to Accommodate", it states, "People with mental health or addiction issues who use service animals to assist with them with disability-related needs (such as anxiety) are also protected under the definition of "disability" in section 10 of the Code.  Service animals for people with psychiatric disabilities or addictions do not have to be trained or certified by a recognized disability-related organization."  (Note the use of the term "Service" animal by the OHRC.  The OHRC does not use the term "support" or "emotional support" animal.)

Despite that the term Emotional Support Animal" (ESA) is not stated above, the authors have observed that ESAs may be widely considered synonymous with the OHRC Section 13 content, especially by ESA users.  Concerns exist of a general notion that anyone that wants the companionship of their pet in public can claim it to be an ESA, with full public rights.

Another criterion exists as required by law, under Section 13, OHRC.  That is, ". . . where it is not immediately obvious that the animal is performing this [mental health related] service, a person must be able to show evidence (such as medical evidence, or from a similar service provider) that they have a disability and that the animal assists with their disability-related needs."  The health professionals have been specified under the Ontario Integrated Accessibility Standards Regulation, (OIAS), Part, IV.2, (4), (b), "the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability".

This provision, however, should not provide anybody with simply a desire to have a pet companion in open public access.  The regulated health professional, by charge of their respective college, should clinically determine a distinct and clear need by the individual, based on treatment knowledge, and/or assessment.

Competing Rights:  Built into the Ontario Human Rights Code is the concept of Competing Human Rights (http://www.ohrc.on.ca/en/policy-competing-human-rights).  How effective is the OHRC in addressing the complex and reportedly manifest conditions of competing rights of others in everyday community access, by variously trained or untrained service and support animals?  Where does one turn in the face of a real-time competing rights situation, where the condition is disruptive and/or creating untenable risks – while it is happening?

## Easily Attained "Credentials" and Identifications Online

A simple Google search, such as "certified service animal" has consistently rendered a full page of various online certification-like companies.  For various fees, a person can "register" and/or "certify" their animal through one of the online companies.  The companies typically also sell an array of

photo-IDs, certification documents, and identification gear, such as leads, vests, ID tags, collars, harnesses, patches, etc.

One website boasts, "ESA Letters issued by real therapists in your Province, delivered in 48 hours or less."

This is deeply troubling to SSAI leadership, as well as to the bulk of stakeholders engaged throughout the SSAI process. 79% of the Users and Advocacy/Animal-Training group respondents to the Public Survey identified this as an agreed issue. Over 55% of Governance, and Public Organizations, and Businesses, Services group respondents did as well.

It is highly recommended to **not** go to these sources for any of the products they sell. As stakeholders, we need to discourage the use of uncertified vendors. We should inform stakeholders of the risks to animal users and the general public. The documentation of a user's disability-related need for a service animal through one of nine regulated health professional is a valid document. It is fully able to be used in lieu of any online identification gear or other documents.

Animal Identification can also be addressed through the recommendation (above recommendations table 3): "Provide Municipal-based, easily identified tags or other simple IDs/indicators". This may be a different colour license tag. Or, it may be similar to the Ottawa OC Transpo ID card."

## Availability of trained service dogs does not meet the many people in need.

This is a systemic and increasing challenge for which the SSAI has little capacity to make recommendations. The main concern is that we do recognize this as very serious situation. The authors think this issue is magnified by:

- The increase of community-based accessibility with increased activities of persons with disabilities in the community.

- Relatively recent recognition of populations which have shown to greatly benefit from a highly trained service dog (e.g., autism, PTSD).

- Difficulty to grow centres that provide highly trained service dogs, especially in shorter periods of time.

- The disruption to training processes and staff due to COVID-19.

Another consideration is when people who desperately need a trained service dog, may seek out sources outside the longer-standing service dog training centres. This could increase training performed by 1:1 paid trainers; friends and family providing training with lesser skills in the area; users attempting to perform their own training; etc.

## Recent Development:  Online Service Dog Training Courses

The previous concern (trained animal availability) may well have led to a recently recognized development. That is, online training companies, providing service dog training courses. One of these sites claims it is, ". . . focused on helping people with physical and mental disabilities to train their own dog to become a qualified service dog to assist in their daily life". The training provided appears to be mostly pre-created and prepared as remote learning, with minimal 1:1 time spent

with an instructor.  Being remote would also increase the likelihood that no hands-on services are being provided with the dog or dog and user.

Areas listed as covered by the online companies include:

- "Intensive Service Dog Training"
- Psychiatric Service Dog
- Diabetic Alert/Medical Response
- Autism Companion Dog
- Therapy Dog Training
- Emotional Support Animal (ESA) Training

The online training sites also claim certification and accreditation.  The certification appears similar to the online credentialling and identification products that other online businesses provide for a fee.  The accreditation listed on one site is of simply another online training company –listed as "Service Dog Training International".  The online logo and name may look and sound impressive.  However, the accrediting organization is simply another online training site.  It is not an accrediting and standards monitoring organization such as the International Guide Dog Federation, or Assistance Dogs International.

## Further Consideration of Barriers:  Government & the "Environment"

The environment can either help with access, or create barriers for persons with a disability. The environment is everywhere we spend time, and everything we interact with.  It is made up of all contexts that include things like:

- Attitudes & Culture.
- General Inclusion versus Exclusion.
- The Physical Environment (often the only thing that comes to mind as "environment").
- Language and Communication.
- Laws, Regulations, & Policies.
  - How they are created.
  - How they are accessed.
  - How clear or confusing they are.
  - How many exist for one topic.
- Excluding people with disabilities from planning and making change.
- Everyday things like:
  - Customer Service.
  - The Internet.
  - Written and shared information.
  - Training & Education.
  - Transportation.
  - Etcetera.

This issue is also addressed in more detail in the Detailed Study Report and may be most applicable to any governing body to consider further in the development of regulations, policies, and bylaws.

## What We Learned

(This section is written in clear language for easier reading access.)

We went to the Stakeholders to learn:

- What they experience.
- What they think and feel – we asked for their opinions.

We also went to the Stakeholders to:

- Guide the SSAI project from the beginning.
- Research information.
- Design the project and do the work.

Our Stakeholders included:

- Service and Support Animal Users – We included as many types of service animal users as possible.
- Support Persons for Animal Users.
- Businesses and Services – Retail Stores, Libraries, Rec Centres, "Main Street", Parks, etc.
- Government – Municipal, Provincial, Federal – Services, Planning, Laws, Accessibility, etc.
- Government Advisory Committees.
- Animal Training Organizations.
- Disability Support Organizations.

Through research, surveys, workshops, consultations, discussions, and meetings, we learned:

Almost everybody thinks there are big challenges around service and support animals in the community.  The most important challenges include:

- People in businesses, services, government, and the public do not know enough about:
    o How to know the kinds of service and support animals.
    o Laws and Regulations.
    o The rights of animal users in public.
    o How to act around service and support animals.
    o How to include animal users according to the law.
    o How to respond to everybody's different human rights.
- Almost everybody is overwhelmed by too many laws that also seem confusing.
- So many animals and animal types are confusing, to almost everybody.
- Does somebody need an animal if they don't look like they have a disability?
- Some kind of easy identification could help with the confusion.
- Some animal users don't seem to respect other users and the rights of others.
- "Fake" identifications and animal gear is too easy to buy online.  It adds to the confusion, and it should be regulated.
- Different types of animal users do not agree with other animal users, especially about:
    o Training levels and standardizing them.
    o Standardized identification requirements.

    ○ Animals that are not highly trained dogs.

What else we learned:

- We were not able to reach everybody despite how much we tried.  We need to find ways to reach more people, especially in training and awareness.
- There are complex issues that go beyond the helpful recommendations made by the SSAI project.
- The complex issues are real, serious, and need to be resolved with more work by all the stakeholders.

The SSAI has made five recommendations to try helping with the common concerns.  They are detailed in five separate tables above under "Responding to Stakeholders".  Please see the tables for more detail.  The tables provide:

- A real challenge, experienced by many stakeholders.
- A detailed recommendation to help.
- Who would work on the recommendation.
- Who would benefit from making the recommendation work.

We also provide a story to help us understand how COVID-19 has affected our Stakeholders' lives.

Our report also covers complex challenges that still need work, to include:

- Quantity of regulations (Federal, Provincial, Municipal).  Many are also confusing.
- Disagreements among user stakeholders around:
  - Universal Certification.
  - Emotional Support "Service" Animals: No training & problem behaviours.
- Easily Attained "Credentials" and Identifications Online
- Not enough trained service dogs available for people who need them.
- New:  Online training courses for training a person's dog to be a service animal.

# Authorship

## Core Authorship

Miriam Webster defines "author" as, "one that originates or creates something".  Frank N. Magill, from his *Cyclopedia of World Authors*, states that an author is "the person who originated or gave existence to anything".  Based on these definitions, the recognition of core authorship should go to the Stakeholders who gave input and spoke through their lives and experiences – all contributing to the content of this report, in various honest and sincere ways.

If we also look to Roland Barthes, from his *The Death of the Author*, he writes, "it is language which speaks, not the author".

So, let us give first credit to the language of our Stakeholders, who generously provided their thoughts and efforts to create the SSAI's ideas, perspectives, findings, and expressions.

## Principal Author

**David J. Wysocki, M.Sc., OT (Reg) (Ont.)**, Occupational Therapist, Project Lead; Pickering Accessibility Advisory Committee member.  David has been responsible for consolidating into this Monograph, all that was given to the project through the Stakeholders and secondary authors.

## Secondary Authors

Significant and critical contribution to the Monograph content, without whom the Monograph would not have been completed, includes:

**Pina D'Intino, MDes, PMP, CPACC**, Business Transformation, Accessibility Strategist and Consultant.  Pina has been a most significant content contributor and reviewer.  Pina generously provided her esteemed international and Canadian recognized expertise, and her lived experience as a Guide Dog user, in significant contribution to the Monograph writing.

**Timothy J. Higgins B.Com, CPA, CGA,** Accessibility Coordinator, City of Pickering.  Tim has been an essential content contributor and reviewer.  In addition to his leadership and insights used for the content writing, as well as for project guidance, and behind the scenes work, he assured we were creating content that made sense to municipalities and Provincial Government.

# Collaboration and Acknowledgements

## In Memoriam, Councillor Ian Cumming

It is with great sadness that the Service and Support Animals Initiative team, partners, participants, and friends acknowledge the leadership of the late Pickering Councillor Ian Cumming in helping to provide the initial inspiration as well as ongoing vision, direction, and support for this project.

This project would not have been possible without:

- Pickering Councillors **Maurice Brenner** and **Ian Cumming** who recognized the need to consult with the first stakeholder group, the **Pickering Accessibility Advisory Committee** (PAAC).  They acted as keenly responsive to their constituents, who had approached them with their questions, concerns, and ideas around community access by persons with service and support animals.

- **The City of Pickering** and its constant support in countless ways throughout the project, from its inception to its continuing completion.

- The hundreds of Stakeholders, from all groups who took their time and energies to contribute to the various forms of input, essential to the meaningful and valid outcomes of the SSAI.

- The direct supports provided us by the **Province of Ontario, Ministry for Seniors and Accessibility**.

- Early recognition and support provided us by **Alfred Spencer**, (then) Director, Public Education and Outreach Branch, Ontario Ministry for Seniors and Accessibility.

The SSAI must recognize the invaluable assistance, with deep appreciation of:

- **Athar Shabbar, MDes**, Organizational Development Specialist at Inclusive Design Lab.  Athar's deep experience from early engagement and facilitation of Innovation Labs proved crucial to

the SSAI's ability to initiate, design and facilitate this unique process of the SSAI Virtual Innovation Lab (VIL).  Athar spent immeasurable time sharing and responding to the many hurdles, with the SSAI team, in this early COVID-19 effort.  His presence helped assure the VIL was accessible, complete, dynamic, and most successful.

The SSAI relied entirely and heavily on the many roles and responsibilities provided throughout the project.  We are continuously grateful to:

- The original **Service Animal Task Group**, generated through the Pickering Accessibility Advisory Committee (PAAC), to respond to the PAAC's recommendations to Councillors Brenner and Cumming.  This group grew from a half dozen to over a dozen stakeholder-based members who vibrantly engaged in the initial work at hand, eventually leading to the Service and Support Animals Initiative (SSAI).

- The six **Co-Facilitators of the Virtual Innovation Lab**.  It took commitment, flexibility, and hard work during the countless hours it took to help plan, run, and report on a unique process – an actual <u>virtual</u> innovation lab.

The SSAI is profoundly grateful to:

- The over 30 **Virtual Innovation Lab (VIL) Stakeholder Participants**.  It was an immense pleasure to work so closely with such a key group of Stakeholders.  It took hours of commitment on their part, with open, honest, and generous engagement – working closely among all VIL participants, of varying backgrounds, learning, deliberating, and solving real issues around community access for service and support animal users.

The SSAI expresses its continued appreciation to:

- **OCAD-University's Inclusive Design Research Centre (IRDC)**.  Its leadership stepped up to the plate at a time when we were mostly unsure of how to implement a Virtual Innovation Lab, using platform technology at the time to run a complex workshop and do so with an attempt at a fully accessible experience for all participants.  **David Pereyra, Ph.D., MArch**, Project & Outreach Coordinator, IDRC, stuck with us through the four Virtual Innovation Lab sessions, always solving the technical and access issues that popped up before, during and after each session, so we could run a viable Innovation Lab.

- **Gloria Bernal**, who worked closely with the survey design team to produce a unique, dynamic survey format that answered to the different Stakeholder needs.  It took many meetings and discussions with the team, with numerous drafts and expert online design skills, to produce the exact survey tools the project required.  She followed through with crucial data harvesting and management so we could produce meaningful measurements and apply these to the SSAI process and outcomes.

- The **hundreds of Stakeholders** that generously contributed their time, thoughts, and feelings, in the stakeholder engagement process, including the over 350 Public Survey respondents.  This includes a special recognition for the additional time and deliberative consultative engagement of the Secondary VIL outcomes reviewers.

- To an awesome friend, companion, and loyal, and very skillful, helpful assistant:  **Itzy the Guide Dog**.  Itzy is pictured working, with Pina, on page 34.  It is that amazing, selfless, and insightful giving that a guide dog can provide that keeps us going and loving.

# Disclaimers & Qualifiers

This report is the result of many efforts provided by many people.  It is intended to be a representation of the hundreds of Stakeholders engaged, and their input.  All reasonable efforts have been made, in good faith, for the report to be as fully representative of the Stakeholders' voluminous and diverse contributions.  This means it is intended to represent information from Stakeholders that are in agreement with one another, and where Stakeholders differ in their perspectives, ideas, and even terminology.  It is about the Stakeholders' opinions, not the authors'.  Where authors' opinions are offered, it is still done from a recognition of the constituency of Stakeholders – not personalized opinions of the authors.

It is critical that the notable efforts that went into in-depth and extensive Stakeholder engagement and representation be embodied in this report.  Through various Stakeholder feedback, it was shared by a significant majority that:

- The processes were inclusive, engaging, fair, representative of various viewpoints, and pertinent to the issues.

- Participants recognized the ability to learn from others and gain a bigger, more inclusive picture.

This is evident in the following Stakeholder shared statements:

- "I had just taken a course on Human Centered Design or Design Thinking, so it was great to see this practice put to use."

- [It was positive] ". . . having a wide variety of perspectives and people of different backgrounds with different needs."

- "It was great to work with people from all experiences and to learn from them.  Lots of great ideas were shared in a respectful way"; "Collaborative, gained valuable insights from other participants."

It is rewarding to hear this from the engaged Stakeholders.  Full and diverse Stakeholder engagement has been the M.O., *modus operandi*, for the entire SSAI project and leadership.  Of course, not everyone was in agreement with all things, or even the project itself.  It was attempted to represent the various differing opinions in this report and in the SSAI findings as well.  The views expressed in the Monograph are the views of the SSAI Project and Stakeholders, and do not necessarily reflect those of the Province of Ontario.

Lastly, all reasonable and good faith efforts have been made to provide accurate information and all the applicable information necessary to represent the SSAI subject.  Efforts have also been made to report content that is outside the scope of the project.  This said, errors and omissions can occur.  If a reader perceives issues of accuracy or omission, we ask that you address this with the project, so we can make efforts to correct it.  Or at least discuss where and where-not accurate information was perceived.  Please feel free to contact the project at info@aequmaccess.com.

**Accessibility**

All efforts have been made to provide this report as accessible as possible.  We follow and go beyond the many digital standards and best practices that are required, to provide accessibility according to

both the law, and the full spirit of the term.  Please feel free to let us know if you perceive something else that could have made a difference for you.

## Now on to more accessibility, advocacy, and inclusion work.

## Will you join us?