

LATE TESTIMONY



HAWAI'I CIVIL RIGHTS COMMISSION

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Lidia Wong

February 23, 2011
Conference Room 016
9:00 a.m.

To: The Honorable Clayton Hee, Chair
Members of the Senate Committee on Judiciary and Labor

From: Coral Wong Pietsch, Chair
and Commissioners of the Hawai'i Civil Rights Commission

Re: S.B. No. 892, S.D.1

The Hawai'i Civil Rights Commission (HCRC) has enforcement jurisdiction over state laws prohibiting discrimination in employment, housing, public accommodations, and access to state and state-funded services. The HCRC carries out the Hawai'i constitutional mandate that "no person shall be discriminated against in the exercise of their civil rights because of race, religion, sex or ancestry". Art. I, Sec. 5.

The HCRC has several concerns about SB 892, SD1.

Section 1 of the bill states that the purpose of the act is to conform state law regarding dog licensing and public access to recently finalized U.S. Department of Justice (DOJ) rules regarding service animals under Title II of the Americans with Disabilities Act (ADA), relating to government services and programs, and Title III of the ADA, relating to public accommodations. The HCRC does not have objections to conforming H.R.S. § 347-13 (dog licensing) or H.R.S. §347-13 (rights of blind, visually impaired and disabled persons in public conveyances) to the DOJ rules. However, those rules do not necessarily control interpretation of the state law which prohibits discrimination in places of public accommodations, under H.R.S. Chapter 489. This is because state law can provide more protections than federal law. See, California Federal Sav. and Loan Ass'n v. Guerra, 479 U.S. 272, 107 S. Ct. 683 (1987) (federal law is a

“floor” beneath which protections against discrimination should not drop, rather than a “ceiling” above which protections cannot rise under state discrimination laws.) While the DOJ rules regarding service animals under the ADA Titles II and III narrowly define “service animals” to include dogs (and miniature horses) only, state statutes regarding reasonable accommodations for persons with disabilities in public accommodations may be interpreted more broadly. Accordingly, Section 1 of the bill should be amended to clarify that the purpose of the bill is to conform the affirmative provisions of H.R.S. §347-13, and not “state law” generally, to Titles II and III of the ADA.

In addition, Section 1 should be amended to state that the purpose of the bill is to conform H.R.S. § 515-3 to reflect the language in the Fair Housing Act, which does not specifically refer to either service or comfort animals, though both can be included as reasonable accommodations for persons with disabilities. The Disability and Communications Access Board (DCAB) has drafted amendments to Section 1 of SB. 892, SD1 that address these and other concerns. For the reasons stated above, the HCRC supports and urges adoption of DCAB’s proposed amendments in an S.D.2.

Section 4 of the bill deals with assistance animals as reasonable accommodations in H.R.S. §515-3, the state’s fair housing law. While the Federal Fair Housing Act (FHA) does not make specific reference to service or comfort animals as reasonable accommodations, HUD, in its Handbook regarding subsidized multi family housing programs, and in a recent memo to its regional directors, states that that reasonable accommodations under the FHA can include “assistance animals”. Assistance animals are defined as animals that work, provide assistance, or perform tasks for the benefit of a person with a disability, or animals that provide emotional support that alleviates one or more identified symptoms or effects of a person’s disability. HUD also states that the ADA Title II and III definitions of service animals only as dogs does not apply to the FHA. See, HUD Handbook 4350.3 § 2-44 (2009), Memorandum for All FHEO Regional Directors dated February 17, 2011, attached.

The HCRC, DCAB and members of the Hawai’i Legislative Action Committee of the Community Associations Institute recently met to draft language for SB 1302, SD1 to clarify that the reasonable accommodations provisions under H.R.S. §515-3 are consistent with the FHA and HUD and caselaw

interpretations of the FHA and may include the use of assistance animals. While this draft language is still a work in progress, we urge this committee to adopt it in Section 4 of an SB 892 S.D.2 so that it will be consistent with amendments proposed in SB 1302, SD1. Attached also is a copy of that draft language.

STATE OF HAWAII

A BILL FOR AN ACT

RELATING TO FAIR HOUSING REASONABLE ACCOMMODATIONS.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF HAWAII:

SECTION 1. The purpose of this Act is to clarify that the reasonable accommodations provisions in state fair housing law are consistent with the federal Fair Housing Act [FHA] and case law and interpretations of the FHA. ~~[clarifying that a request for a reasonable accommodation may include the use of a service animal and by defining the term "service animal".]~~ Nothing in this act shall be construed to afford a person with a disability fewer rights or remedies than the federal Fair Housing Act of 1968, as amended by the Fair Housing Amendments of 1988 [FHAA] and its implementing regulations, or state law relating to fair employment and housing as it existed prior to the enactment of this act, nor to diminish the rights of providers of housing accommodations under those federal and state laws.

SECTION 2. Section 515-3, Hawaii Revised Statutes, is amended to read as follow:

"§515-3 **Discriminatory practices.** (a) It is a discriminatory practice for an owner or any other person engaging in a real estate transaction, or for a real estate broker or salesperson, because of

race, sex, including gender identity or expression, sexual orientation, color, religion, marital status, familial status, ancestry, disability, age, or human immunodeficiency virus infection:

- (1) To refuse to engage in a real estate transaction with a person;
- (2) To discriminate against a person in the terms, conditions, or privileges of a real estate transaction or in the furnishing of facilities or services in connection [~~therewith,~~] with a real estate transaction;
- (3) To refuse to receive or to fail to transmit a bona fide offer to engage in a real estate transaction from a person;
- (4) To refuse to negotiate for a real estate transaction with a person;
- (5) To represent to a person that real property is not available for inspection, sale, rental, or lease when in fact it is available, or to fail to bring a property listing to the person's attention, or to refuse to permit the person to inspect real property, or to steer a person seeking to engage in a real estate transaction;
- (6) To print, circulate, post, or mail, or cause to be published a statement, advertisement, or sign, [~~or~~] to use a form of application for a real estate transaction, or to make a record or inquiry in connection with a prospective real estate transaction, that indicates, directly or indirectly, an intent to make a limitation, specification, or discrimination with respect [~~thereto,~~] to a real estate transaction;
- (7) To offer, solicit, accept, use, or retain a listing of real

property with the understanding that a person may be discriminated against in a real estate transaction or in the furnishing of facilities or services in connection ~~[therewith,]~~ with a real estate transaction;

~~[-(8) To refuse to engage in a real estate transaction with a person or to deny equal opportunity to use and enjoy a housing accommodation due to a disability because the person uses the services of a guide dog, signal dog, or service animal, provided that reasonable restrictions or prohibitions may be imposed regarding excessive noise or other problems caused by those animals. For the purposes of this paragraph:~~

~~"Blind" shall be as defined in section 235-1;~~

~~"Deaf" shall be as defined in section 235-1;~~

~~"Guide dog" means any dog individually trained by a licensed guide dog trainer for guiding a blind person by means of a harness attached to the dog and a rigid handle grasped by the person;~~

~~"Reasonable restriction" shall not include any restriction that allows any owner or person to refuse to negotiate or refuse to engage in a real estate transaction; provided that as used in this paragraph, the "reasonableness" of a restriction shall be examined by giving due consideration to the needs of a reasonable prudent person in the same or similar circumstances. Depending on the circumstances, a "reasonable restriction" may require the owner of the service animal, guide dog, or signal dog to comply with one or more of the following:~~

- ~~(A) Observe applicable laws including leash laws and pick-up laws;~~
- ~~(B) Assume responsibility for damage caused by the dog; or~~
- ~~(C) Have the housing unit cleaned upon vacating by fumigation, deodorizing, professional carpet cleaning, or other method appropriate under the circumstances.~~

~~The foregoing list is illustrative only, and neither exhaustive nor mandatory;~~

~~"Service animal" means any animal that is trained to provide those life activities limited by the disability of the person;~~

~~"Signal dog" means any dog that is trained to alert a deaf person to intruders or sounds;~~

~~(9)]~~ (8) To solicit or require as a condition of engaging in a real estate transaction that the buyer, renter, or lessee be tested for human immunodeficiency virus infection, the causative agent of acquired immunodeficiency syndrome;

~~[(10)]~~ (9) To refuse to permit, at the expense of a person with a disability, reasonable modifications to existing premises occupied or to be occupied by the person if modifications may be necessary to afford the person full enjoyment of the premises ~~[-—A]~~; provided that a real estate broker or salesperson, where it is reasonable to do so, may condition permission for a modification on the person agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted;

~~[-(11)-]~~ (10) To refuse to make reasonable accommodations [~~including the use of a service animal,~~] in rules, policies, practices, or services, when the accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a housing accommodation; provided that when making a reasonable accommodation for the use of an [service] animal, reasonable restrictions may be imposed; [regarding excessive noise or other problems caused by the animals,]

~~[-(12)-]~~ (11) In connection with the design and construction of covered multifamily housing accommodations for first occupancy after March 13, 1991, to fail to design and construct housing accommodations in such a manner that:

- (A) The housing accommodations have at least one accessible entrance, unless it is impractical to do so because of the terrain or unusual characteristics of the site; and
- (B) With respect to housing accommodations with an accessible building entrance:
 - (i) The public use and common use portions of the housing accommodations are accessible to and usable by ~~[disabled]~~ persons ~~[+]~~ with disabilities;
 - (ii) Doors allow passage by persons in wheelchairs; and
 - (iii) All premises within covered multifamily housing accommodations contain an accessible route into and through the housing accommodations; light switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; reinforcements in the bathroom walls allow

installation of grab bars; and kitchens and

bathrooms are accessible by wheelchair; or

~~[(13)]~~ (12) To discriminate against or deny a person access to, or membership or participation in any multiple listing service, real estate broker's organization, or other service, organization, or facility involved either directly or indirectly in real estate transactions, or to discriminate against any person in the terms or conditions of ~~[such]~~ access, membership, or participation.

~~[(b)] For purposes of this section, any restriction that allows any owner or person to refuse to negotiate or engage in a real estate transaction or to deny equal opportunity to use and enjoy a housing accommodation due to a disability because the person uses a service animal shall not be a reasonable restriction. The reasonableness of a restriction shall be examined by giving due consideration to the needs of a reasonably prudent person in the same or similar circumstances. Depending on the circumstances, a reasonable restriction may require the owner of a service animal to:~~

~~(1) Observe applicable laws including leash laws and pick up laws;~~

~~(2) Assume responsibility for damage caused by the service animal;~~

~~or~~

~~(3) Have the housing unit cleaned upon vacating by fumigation, deodorizing, professional carpet cleaning, or other method appropriate under the circumstances;~~

~~provided that the items listed in paragraphs (1) through (3) are illustrative only, and neither exhaustive nor mandatory.~~

~~(c) For the purposes of this section:~~

LATE TESTIMONY

**HUD Handbook 4350.3:
Occupancy Requirements of Subsidized
Multifamily Housing Programs**

Example – Reasonable Accommodation that Does Not Create an Undue Financial and Administrative Burden

An applicant with a mobility impairment wants to live in a dwelling unit in a particular rental housing property. The owner requires all tenants to hand-deliver their rent to the rental office. The unit is almost a block away from the rental office, but there is a mailbox located just a few yards from the unit entry door. Under 24 CFR 100.204, the owner or manager of an apartment complex must permit the applicant to mail the rent payment to the rental office. This policy accommodation would not pose an undue financial and administrative burden on the owner and allows the applicant to have equal opportunity to use and enjoy the unit.

- E. For other guidance on how to determine whether a reasonable accommodation would result in an undue financial and administrative burden, refer to HUD Handbook 4350.1, *Multifamily Asset Management and Project Servicing*.

2-44 Assistance Animals as a Reasonable Accommodation

- A. Assistance animals are not pets. They are animals that work, provide assistance, or perform tasks for the benefit of a person with a disability, or animals that provides emotional support that alleviates one or more identified symptoms or effects of a person's disability. Assistance animals – often referred to as "service animals," "assistance animals," "support animals," or "therapy animals" – perform many disability-related functions, including but not limited to guiding individuals who are blind or have low vision, alerting individuals who are deaf or hard of hearing to sounds, providing minimal protection or rescue assistance, pulling a wheelchair, fetching items, alerting persons to impending seizures, or providing emotional support to persons with disabilities who have a disability-related need for such support.
- B. A housing provider may not refuse to allow a person with a disability to have an assistance animal merely because the animal does not have formal training. Some, but not all, animals that assist persons with disabilities are professionally trained. Other assistance animals are trained by the owners themselves and, in some cases, no special training is required. The question is whether or not the animal performs the disability-related assistance or provides the disability-related benefit needed by the person with the disability.
- C. A housing provider's refusal to modify or provide an exception to a "no pets" rule or policy to permit a person with a disability to use and live with an assistance animal would violate Section 504 of the Rehabilitation Act and the Fair Housing Act unless:
1. The animal poses a direct threat to the health or safety of others that cannot be reduced or eliminated by a reasonable accommodation,

2. The animal would cause substantial physical damage to the property of others,
 3. The presence of the assistance animal would pose an undue financial and administrative burden to the provider, or
 4. The presence of the assistance animal would fundamentally alter the nature of the provider's services.
- D. The fact that a person has a disability does not automatically entitle him or her to an assistance animal. There must be a relationship between the person's disability and his or her need for the animal.
- E. A housing provider may not require an applicant or tenant to pay a fee or a security deposit as a condition of allowing the applicant or tenant to keep the assistance animal. However, if the individual's assistance animal causes damage to the applicant's unit or the common areas of the dwelling, at that time, the housing provider may charge the individual for the cost of repairing the damage if the provider regularly charges tenants for any damage they cause to the premises.

Subsection 5: Additional Fair Housing Act Requirements

2-45 Fair Housing Act Basic Accessibility Requirements

The Fair Housing Act requires that all buildings designed and constructed for first occupancy after March 13, 1991 meet certain basic accessibility requirements. This requirement applies to all new construction, regardless of the presence of federal financial assistance. See 24 CFR 100.205. Owners of properties that should have been constructed in accordance with these requirements but were not, are obligated to retrofit their units to bring them into compliance with the Act. If a tenant in one of these properties requests modifications to a unit that should have been made at the time of construction, the owner has an affirmative obligation to make and pay for those modifications as part of its original obligation to conform to the Fair Housing Act design and construction requirements.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-2000

February 17, 2011

OFFICE OF FAIR HOUSING
AND EQUAL OPPORTUNITY

MEMORANDUM FOR: All FHEO Regional Directors
Regional Counsel

FROM: Sara K. Pratt, Deputy Assistant Secretary for Enforcement
and Programs, ED

SUBJECT: New ADA Regulations and Assistance Animals as
Reasonable Accommodations under the Fair Housing Act
and Section 504 of the Rehabilitation Act of 1973

I. Purpose

This memo explains that the Department of Justice's (DOJ) recent amendments to its Americans with Disabilities Act (ADA) regulations¹ do not affect reasonable accommodation requests under the Fair Housing Act (FHAct) and Section 504 of the Rehabilitation Act of 1974 (Section 504). The DOJ's new rules limit the definition of "service animal" in the ADA to include only dogs. The new rules also define "service animal" to exclude emotional support animals. This definition, however, does not apply to the FHAct or Section 504. Disabled individuals may request a reasonable accommodation for assistance animals in addition to dogs, including emotional support animals, under the FHAct or Section 504. In situations where both laws apply, housing providers must meet the broader FHAct/Section 504 standard in deciding whether to grant reasonable accommodation requests.

II. Definitions of Service Animal

The DOJ's new ADA rules define "service animal" as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. The new rules specify that "the provision of emotional support, well-being, comfort, or companionship do not constitute

¹ Nondiscrimination on the Basis of Disability in State and Local Government Services, Final Rule, 75 Fed. Reg. 56164 (Sept. 15, 2010) (to be codified at 24 C.F.R. part 35); Nondiscrimination on the Basis of Disability in State and Local Government Services, Final Rule, 75 Fed. Reg. 56236 (Sept. 15, 2010) (to be codified at 24 C.F.R. part 36).

work or tasks for the purposes of this definition.” Thus, trained dogs are the only species of animals that may qualify as service animals under the ADA (there is a separate provision regarding miniature horses) and emotional support animals are expressly precluded from qualifying as service animals.

Neither the FHAct, Section 504, nor HUD’s implementing regulations contain a specific definition of the term “service animal.” However, species other than dogs, with or without training, and animals that provide emotional support have been recognized as necessary assistance animals under the reasonable accommodation provisions of the FHAct and Section 504. The new ADA regulation does not change this FHAct/Section 504 analysis, and specifically notes, “[u]nder the FHAct, an individual with a disability may have the right to have an animal other than a dog in his or her home if the animal qualifies as a ‘reasonable accommodation’ that is necessary to afford the individual equal opportunity to use and enjoy a dwelling, assuming that the animal does not pose a direct threat.”² In addition, the preambles to the new rules state that emotional support animals do not qualify as service animals under the ADA but may “nevertheless qualify as permitted reasonable accommodations for persons with disabilities under the FHAct.”³

III. Applying the Law

Under the FHAct and Section 504, individuals with a disability may be entitled to keep an assistance animal as a reasonable accommodation in housing facilities that otherwise impose restrictions or prohibitions on animals. In order to qualify for such an accommodation, the assistance animal must be necessary to afford the individual an equal opportunity to use and enjoy a dwelling or to participate in the housing service or program. Further, there must be a relationship, or nexus, between the individual’s disability and the assistance the animal provides. If these requirements are met, a housing facility, program or service must permit the assistance animal as an accommodation, unless it can demonstrate that allowing the assistance animal would impose an undue financial or administrative burden or would fundamentally alter the nature of the housing program or services.⁴

Under the ADA, the animal need only meet the definition of “service animal” to be covered by the law. No further test or reasonable accommodation analysis should be applied. An individual’s use of a service animal in an ADA-covered facility should not be handled as a request for reasonable accommodation. If an animal qualifies as a “service animal,” ADA-

² 75 Fed. Reg. at 56194, 56268.

³ 75 Fed. Reg. at 56166, 56240.

⁴ The request may also be denied if the specific animal in question poses a direct threat to the health and safety of others that cannot be reduced or eliminated by a reasonable accommodation or if the specific animal would cause substantial physical damage to the property of others that cannot be reduced or eliminated by a reasonable accommodation.

covered entities may not restrict access to a person with a disability on the basis of his or her use of that service animal unless the animal is out of control and its handler does not take effective action to control it or if the animal is not housebroken. The service animal must be permitted to accompany the individual with a disability to all areas of the facility where customers are normally allowed to go.

The new ADA definition of “service animal” applies to state and local government services, public accommodations, and commercial facilities; the FHAct covers housing services and facilities; and HUD’s Section 504 regulations apply to all recipients of HUD-funds. Some types of entities, such as rental offices and housing authorities, are subject to both the service animal requirements of the ADA and the reasonable accommodation provisions of the FHAct or Section 504. Entities must ensure compliance under all relevant civil rights laws. Compliance with the ADA’s regulations does not ensure compliance with the FHAct or Section 504. An entity that is subject to both the ADA and the FHAct or Section 504 must permit access to ADA-covered “service animals” and, additionally, apply the more expansive assistance animal standard when considering reasonable accommodations for persons with disabilities who need assistance animals that fall outside the ADA’s “service animal” definition.

IV. Conclusion

The ADA regulations’ revised definition of “service animal” does not apply to reasonable accommodation requests for assistance animals in housing under either the FHAct or Section 504. Rules, policies, or practices must be modified to permit the use of an assistance animal as a reasonable accommodation in housing when its use may be necessary to afford a person with disabilities an equal opportunity to use and enjoy a dwelling, common areas of a dwelling, or participate in, or benefit from, any housing program receiving Federal financial assistance from HUD, unless an exception applies.



DISABILITY AND COMMUNICATION ACCESS BOARD

919 Ala Moana Boulevard, Room 101 • Honolulu, Hawaii 96814
Ph. (808) 586-8121 (V/TDD) • Fax (808) 586-8129

February 23, 2011

TESTIMONY TO THE SENATE COMMITTEE ON JUDICIARY AND LABOR

Senate Bill 892, SD1 - Relating to Service Animals

The Disability and Communication Access Board supports Senate Bill 892, SD1.

The purpose of this bill is to conform §143-4, Hawaii Revised Statutes (HRS), regarding dog licensing to applicable provisions of the Americans with Disabilities Act; §347-13, HRS to the recently issued Americans with Disabilities Act rules for Titles II and III, effective March 15, 2011 and §515, HRS to the current Fair Housing Act as it relates to the issue of service animals.

Section 1: Purpose and Finding

The wording in Section 1 refers to Senate Bill 892, rather than to Senate Bill 892, SD1, which contained many changes as noted in Standing Committee Report 326. We therefore offer the following language to replace Section 1 in its entirety to be consistent with SD1.

“SECTION 1. The Legislature finds that selected references to service animals in state law are either obsolete or inconsistent with federal law. The purpose of this Act is to:

- (1) Clarify Section 143-4, Hawaii Revised Statutes, regarding dog licensing to appropriately conform provisions applicable to service dogs with the Americans with Disabilities Act (ADA);
- (2) Conform Section 347-13, Hawaii Revised Statutes, relating to public conveyances to Titles II and III of the ADA; and
- (3) Conform Section 515-3, Hawaii Revised Statutes relating to discriminatory practices in real estate transactions to reflect the language in the federal Fair Housing Act, as it relates to individuals with disabilities.”

Section 2: Relating to Licensing

Section 2 of the bill deletes reference to the Counties to designate status of a service dog on a dog license. Dogs must still be licensed as dogs. However, the U.S. Department of Justice has reaffirmed its position that service animals (dogs) cannot be required to have an extra license or certification, therefore this provision is archaic and moot.

Section 3: Relating to Public Places and Public Conveyances

Section 3 of the bill amends §347-13, HRS relating to public places and public conveyances. The proposed language inserts a definition for service dog that is consistent with the Americans with Disabilities Act. It also amends the language to reflect more politically current, people-first language. As suggested in a prior hearing by a constituent, we suggest that the language of “physically disabled” person be changed to “person with a physical disability” on page 5, lines 4-15. Also, since the Department of Human Services does not have rules for this section and does not enforce it, developing rules is unnecessary and such language is deleted.

Section 4: Relating to Housing

Section 4 of the bill amends §515-3, HRS relating to housing and nondiscrimination. Comparable federal law is the Fair Housing Act (FHA), rather than the Americans with Disabilities Act. The requirement under the FHA is to provide a “reasonable accommodation” with no additional specificity other than that developed by case law.

We agree with the contents of Section 4 as proposed. However, we have met with the Hawaii Civil Rights Commission who enforces §515-3, HRS, and understand that it is proposing some changes. We have seen the changes and support them.

Thank you for the opportunity to testify.

Respectfully submitted,



BARBARA FISCHLOWITZ-LEONG
Chairperson
Legislative Committee



FRANCINE WAI
Executive Director

From: Jeanne Torres [jtorres@eyeofthepacific.org]
Sent: Tuesday, February 22, 2011 4:15 PM
To: JDLTestimony
Subject: TESTIMONY: SD 892 SD1

LATE TESTIMONY

Senate Committee on Judiciary and Labor
Senator Clayton Hee, Chair

22 February 2011

RE: SB 892, SD1

Dear Mr. Chair and Committee Members:

My name is Jeanne Torres and I am in support for the intent of the above referenced bill. I am working with my third guide dog and work closely with the training and continuing technical support for working guide dogs.

I support the intent for amending the definition of a service animal to be consistent with ADA. I feel that the state regulation should be clear and simple. The dog being muzzled should be removed from the definition as it is unreasonable to expect a service dog to be muzzled. If the dog is muzzled, it really shouldn't be in public.

I further support the intent of licensing the service dog and including the career classification to be noted on the license. Since we already have dog tag licensing in place, I feel that we should take it a step further and display the career classification on the tag as well. We have a growing concern about animals misrepresenting service animals in public. To control this problem, business owners/operators will have the opportunity to determine whether the dog is a service animal by looking at the tag. Businesses will be reassured and true service dog handlers will regain full confidence in public without having to anticipate an unruly dog in the area.

Additionally, DMV presently requires proof of service dog training completion and veterinary records in order for a dog to be classified as a service animal on the license. It is necessary for a service dog to have been successfully evaluated for good citizenship before formal training for a specific task to serve a disabled individual because the behavior of the dog must be fully focused on the handler. In place of requiring proof of training certification, the licensing agent should be authorized to require a certificate of good citizenship to be classified as a service dog.

Lastly, I oppose any legislation that will include comfort animals as service animals. This will take away the true meaning of a service animal and the level of service they provide.

With best regards,
Jeanne Torres

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