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# FAQ ABOUT SERVICE DOG ACCREDITATION SCHEME - PART II

## SERVICE DOGS – A NATIONAL APPROACH



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## INTRODUCTION

In our research, our meetings and communications with stakeholders, it seems that the same questions are raised time and time again, and therefore we thought we could use these to help you find the answers we have prepared in this FAQ format (hereafter PART II of this submission).

The Documents related to the answers are all available in the Addendum section of the document (**Part III**), and we have tried to link the questions as much as possible to where you can find the answers. Please note in some case the answer encapsulates the writers of this document's interpretation and may require more research to obtain the best possible answer.

Our Draft Solutions section **Part III** has made a good start in finding workable, practical, and sound suggestions that will make a National Service Dog Accreditation Scheme (**NSDAS**) a must.

We have prepared an easy Table of Contents that proceeds **Part II & III**. This allows you to easily find documents we refer to in the submission. Please do not hesitate to ask for more information from the writers.

You will find the same document in the Addendum (it appears in both presentations) as it forms the link between promoting the concept (this document) and the actual practical Draft Solutions (Addendum with DRAFT Solutions document).

The abbreviations used in this document are listed below:

National Service Dog Accreditation Scheme (**NSDAS**)

Service Dog (**SD**), Assistance Dog (**ASD**)

The suggested new Service Dog Act (**SD ACT**)

National Public Access Test (**NPAT**)

Frequently Asked Questions (**FAQ – Part II**)

Addendum with Draft Solutions (**DS – Part III**)

Public Perception of Service Dogs (**PPSD – Part IV**)

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## How should Service Dogs be defined in Australian legislation?

"A guide dog, hearing dog, or assistance dog", certified by a nationally accredited service dog trainer or 'training organisation'<sup>1</sup> is trained to perform tasks and functions that assist a person with medically identified impairment to alleviate the effects of their impairment". The expression **Service Dog (SD)** is the 'umbrella' description for the family of skilled and trained dogs who help alleviate disability issues for the genuine handler needing these dogs to empower them to lead a more fulfilling life.

In some countries, Assistance dogs is the 'umbrella' word, as suggested by one of the top industry bodies: <https://www.iaadp.org/> In the UK, Service dogs refer to Army dogs, but for our clear understanding we see top of the umbrella (grouping) Service Dogs and below that all the different types of SD's. Please refer to **DS Part III No 1: Difference between SD, ASD's and others**

## Should the current Assistance Dog provisions in the Disability Discrimination Act be extended to provide protection for all service dog OR assistance animal partnerships in all areas of activity covered by the Act?

The submission talks about the difference type of SD (see **DS Part III No 1**) and we address the requirements for the handler to have a genuine, tangible, medically identified need for the SD, which assists in reducing the effects of the disabilities by delivering clearly identified and measurable TASKS (Minimum of 3), with extensive training assessed to delivery safe and unobtrusive integration with the people at large. See Point 16 in this document.

## Is there a better way to ensure everyone knows when they can and cannot exclude a service dog OR assistance animal partnership?

Upon acceptance of the recommended definition (See point 2 in this document) this definition ensures transparent application and interpretation of the new **Service Dog Act (SD ACT)**, alleviating doubt, duplication and misinterpretation.

This new **SD Act** definition is to be widely promoted both on a federal and state level to assist an unrestricted public acceptance.

## Does it make sense to place all Australian laws that support the use of Service Dogs in a separate Act?

The benefits of such a **SD Act** is a national consistent, and transparent approach, offering a 'One Card' approach like an Australian passport – allowing free-flowing traffic and recognition between states. Savings on State level can be used for education of all stakeholders. (see point 25)

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<sup>1</sup> 'Trainer' refers to an individual meeting the training and compliance requirements as a Service Dog Trainer and they are listed as individuals on Governments sites – whereas Training Organisations are used for any registered charity or Pty Ltd that has some trainers employed directly by these organisations as qualified trainers in this specialist field. Trainers engaged by these organisations MUST meet the same training and legal requirements as the individual trainers, whilst the compliance requirements may rest with the organisation that employs them.

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## Do you support the introduction of a law that would require organizations which train service dogs to be accredited through an accreditation scheme by an administering Government department?

The document starts with a paragraph from QF in 2009 - "it would be preferable for the introduction of a regulated assistance dog system, and its interaction with discrimination, safety and other legislation and standards to be a nationally consistent system" (See Executive Summary).

This desire has grown exponentially over time and is now supported by all stakeholders – (see Executive Summary).

## Which organizations should be eligible for accreditation by the accreditation scheme as a 'service dog organization'?

In the document talks about 'Trainers and Training organisations would be accredited by the Federal Government Department to be "service dog training organisations or trainers". Accreditation standards for trainers would be set out in regulation' (see document point 15)

It recommends a transitional period to align all organisations and trainers to the same Federal **SD Act** requirements, including ADI/Guide Dogs / SEDA / Hearing dogs and all GHAD or state equivalent organisations.

## Should 'service dog organization' status be limited to formal training organizations or should private trainers be included as well?

The document addresses this clearly (see document point 3) – the same rules will apply to all, trainers, organisations and any handler trained teams (under guidance of an accredited trainer)

## How should self-trainers be covered?

Provided they work with a **SD Act** (National Service Dog Act Accredited trainer) listed on the Governments websites partners and assist these self-trained trainers and they meet the relevant requirements of the **SD Act** as far as criteria is concerned (see Document Point 16)

## How might the issue of the cost of training and testing for informally trained service dogs be dealt with?

There is a large variation in training between Trainer Trained SD (like e.g. Guide Dogs) and Handler Trained SD. Therefore, the document recommends that assessments of any kind are done by accredited specialist in that way of training. Organisations continue to wear the cost for any **NPAT** internally and individual trainers should charge a fair amount for their time and effort to process **NPAT** or any other test

## How can inequities be avoided if all dogs must be tested by an accredited service dog organization?

Under a **NPAT** system, inequities are reduced when you have all aligned and using the same **NPAT** system – which can be applied by any accredited training organization or

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trainer, provided applicants have trained under guidance of an accredited trainer AND meet the fundamental requirements (See document Point 16)

[Do you support the development of guidelines for assessing applications by organizations seeking approval as a 'service dog organization?](#)

Outlined in this document, using same system for individual trainers and trainer organisations and their trainers need to also comply. Initial accreditation can only be achieved through the same system and only via the relevant Federal department. (see DS Part III No 3: Service Dogs Accreditation Recommendations)

[Should the guidelines simply require membership of a relevant international or national body that has its own standards, or should generic standards also be included in the guidelines?](#)

Outline in the document we recommend a National standard, based on the best of what the various systems have to offer – setting the highest standards for all stakeholders, especially handler teams. The stringent training requirements to reach **NPAT** standard require more than joining a group, pay and work it out by yourself. This level of users will be reduced and hopefully eradicated with the National **SD Act** standards. Only involvement with an accredited trainer/organisation will ensure the standards are met

[Should the Department of Social Services administer the accreditation system?](#)

The document present the case for this to become reality – as SD's and training belong with a department that can deal with people with disabilities and special needs, showing empathy, understanding for the person, whilst having a solid legal framework to deal with the SD side. A National approach will offer great savings for the states in addition to a more transparent and neutral approach to all stakeholders and allow Social Services to incorporate the SD in the handler package that may already exist. It may well offer an additional avenue for better control and outcomes. Savings from the states from their state programmes should be made available for education of all stakeholders

[What resources will they need to fulfill this role?](#)

Economies of scale on State level are anticipated to be substantial in staffing, infrastructure, administration and maintenance incl printing etc. Give that we are not talking about 1000's of SD in Australia at this time, we recommend to start with a reasonably robust start-up: Budget for staffing – start with 3-4; phone / website / social media for users / social media for trainers only as communication tool with and between trainers, used for reporting; newsletter to update on changes – incorporation of states etc. – can become a newsletter to use for promotional purposes to clients, schools and industry and all stakeholders to launch the **NPAT** project as well as an ongoing communication tool.

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### Do you support the development of regulations setting out a ‘National Public Access Test’ (NPAT) for service dogs?

There should only be one **NPAT** – for Australia wide, with possible add-ons like Airline / specific transport training and assessment. The **NPAT** information should be publicly accessible on the Department’s website and easy to work and comply with. Would recommend video footage of all **NPAT**’s so Department can do spot checks on quality and adherence to standards and if there is any dispute have access to relevant materials. Video footage of certain requirements that require special settings may be considered to help the process, provided these videos are done within the agree **NPAT** format.

NB: Please note that preparations for a **NPAT** form have been made and a draft version is available but on request restricted & confidential access can be made available.

### Do you agree that a service dog must pass a ‘public access test’ by an accredited organization to be declared a ‘trained’ service dog?

Without a doubt – YES - a must to get standards up and aligned and consistent and make the public comfortable with SD’s in general – create better acceptance, which will come from better quality. Those that do not have dogs up to standard of accreditation are the ones that affect the current perception of stakeholders. All CAA’s around the world are reviewing their requirements and risk management after many debacles with pretend SD’s.

### Do you agree that a service dog must be trained to an appropriate level of skill by an accredited organization to be regarded as a ‘trained’ assistance animal under Australian law?

Training by either an accredited training organisation or accredited trainer is a **MUST** – non-negotiable to raise the standards and upon acceptance of the **SD Act** proposal it is recommended to investigate a form of unconventional delivery by Internet. Some non- accredited organisation think a book and a fee will do it – people need interaction, be shown and taught, so likely some hands-on training arrangement is beneficial however an interactive training programme could be delivered online as well.

### Do you support the development of regulations defining what is an appropriate level of training and skill for service dogs?

YES, again stakeholders demand the highest level of training possible, especially behaviour in public is of real concern and very inconsistent. Based on the best combination of all current training systems should deliver a better than standard than any of the individual ones and that is the standard Australia should apply in the **NPAT**

### Who should be consulted in developing such regulations?

All stakeholders, especially the end-users and beneficiaries should have input in how we best achieve a national standard. In **DS Part III No 3** – Service Dogs Accreditation Recommendations, the process to deliver these standards is discussed. Attached to this document you will find a list of stakeholders we have communicated with.



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### What sorts of issues should the regulations cover?

The standards required for a person to be privileged to get the right to a SD. Requirements from a medical and disability perspective ; requirements for trainers and training organisations, regardless of training approach; accreditation of trainers and organisations (incl their trainers) and what is contained in the **NPAT**; any recall mechanism; role and make-up of the recommended advisory body – all covered in **DS Part III No 3 – Service Dogs Accreditation Recommendations**.

### Is a registration scheme necessary?

Imperative for the sake of end users and nationally all stakeholders. A registration system will also open it up for more legitimate assistance for end users

### Should service dogs be registered with the local council?

Yes, again this is a credibility issue. The document – point 16 – describes that those who meet the requirements will be able to register at no cost. Having registration and microchip is a must in case the dog and handler get separated.

### Is there a better way to manage the registration of service dogs?

The National register underpins the quality of support, recognition and professional standards the new **SD Act** will bring to end users, and a future development of the database for public access would ensure only genuine handler teams can benefit from their legal rights. The suggestion is for the numbering system explained in **DS Part III No 3 - Service Dogs Accreditation Recommendations** – will allow for venues to access the ID Card number on a national web based system, which safeguards the privacy but confirms ID number, first name dog name and validity of the ID card. This way the registration has multiple purposes and helps eradicate pretend SD.

### Is an identification scheme necessary?

Yes – a must, and details of the recommendations can be found in **DS Part No 3 – Service Dogs Accreditation Recommendations**.

### Should a person with a service dog be required to carry a standard ID card for the animal?

Yes – a must, and details of the recommendations can be found in **DS Part III No 3 – Service Dogs Accreditation Recommendations** Both pictures of handler and dog need to be clearly visible for any relevant person able to check they are genuine.

### What are the advantages and disadvantages of that approach?

Protects the handler/user's interest and reduce discrimination. The ID card and/or dog will be the focus, so asking for the ID card will reduce that possible stress moment, and also should help eradicate abuse.

### Is the issuing of an identity card by the Department of Social Services the best way to administer the identity scheme?

For those that are accredited under the **NPAT**, it is recommended to have the Department issue the National 'One Card' ID's – used for both transport and ID card.

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This ensures they are genuine, can be maintained on the required national database and handlers are to advise their Trainers of any updates of details. Trainers can assist with 'In Training' ID cards as we have suggested in in **DS Part III No 3 – Service Dogs Accreditation Recommendations**.

#### Is there a better way to achieve the aim of having an easily recognizable simple ID?

If there were, it is questioned why still all countries seem to be struggling with this. Regardless of which organisation or trainer we all have the same issues. A national scheme will not only reduce the pressure on all stakeholders – but also ensuring better recognition and inclusion by the community

#### What information should be on an assistance animal identity card?

We have explained more in our **DS Part III No 3 – Service Dogs Accreditation Recommendations** – this again should be an agreed national format that is safeguarding the privacy of the users, yet also allows stakeholders to ensure they are dealing with the genuine handler team.

It is suggested to have the name handler and dog (names as they can be checked against e.g. driving license); picture handler/dog, validity **NPAT**; government logo; info trainer; and on the back a short explanation of the law; traceable number like a license that can be verified as genuine on a future database.

#### Should a mutual recognition scheme be established across states and territories if a national scheme is not implemented?

We recommend a national scheme based on input of all current schemes; set standard and allow others and stakeholders to adjust to new level over a 12 months integration period. Continuation of the State Schemes will continue to cause discrimination, confusion and undue stress for all stakeholders.

## CONCLUSION:

It is obvious that the above FAQ are addressing just the main points and not all details related to the new National **SD Act** – and we have a number of other **DS Part III** that will play a key role in further confirming the benefits, meeting all the operational requirements and allow Government and stakeholders to take a decision to take this proposal forward and implement it