



Guidelines Enable Service Animals to Travel Safely at a Passenger's Seat

Reviews of U.S. fatal-accident reports and safety studies found no examples of an evacuation that was impeded by a service animal accompanying a qualified passenger with a disability. Civil aviation authorities are updating requirements and guidance, however, as various types of service animals travel in the cabin.

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FSF Editorial Staff

Historically, airlines and other modes of public transportation have been required by law to accommodate guide dogs for blind passengers regardless of separate policies applied to transporting pets and other animals in the aircraft cabin. Guide dogs were introduced in Germany and the United States in the 1920s,¹ and methods of accommodating them in aircraft generally are well established worldwide. Various other service animals, carried outside of a portable kennel, also currently assist passengers with disabilities. As a result, some civil aviation authorities have updated guidance for airline employees about how to safely accommodate service animals in the cabin.

The term “service animal” was redefined in the United States in 2003 as “any animal that is individually trained or able to provide assistance to a qualified person with a disability; or any animal shown by documentation to be necessary for the emotional well-being of a passenger.”^{2,3}

Examples of functions commonly performed by service animals include:



- Helping people who are blind or visually impaired to safely negotiate their surroundings;
- Alerting to sounds people who are deaf or hard-of-hearing;
- Helping people with mobility impairments to open and close doors, retrieve objects, transfer from one seat to another and maintain balance; or,
- Sensing an imminent seizure and alerting people with epilepsy (e.g., so they can safely position themselves), or responding to a disability-related need or emergency (e.g., some psychiatric disabilities).

Some dogs — which may be any breed or size — can be trained to reliably perform such tasks as service animals, and they have been the most familiar to cabin crews. Dogs also may be trained to pull a person's wheelchair, help the person rise from a sitting position or a fallen position, carry a backpack, summon help and/or provide a buffer against jostling in crowds.⁴

Service animals usually travel in the cabin regardless of whether they can perform or will perform their functions/tasks during the flight.

The passenger with a disability who is accompanied by a service animal is considered the “handler” and is solely responsible for its handling, care and supervision. The assisted passenger will expect flight attendants to know that a service animal should be assumed to be “on duty,” and Transport Canada said that service animals normally should not be petted or spoken to by anyone but the assisted passenger⁵ — even though many service animals have been trained to behave appropriately with strangers in public places.

In 2002 guidance for cabin crews, the International Air Transport Association said, “Cabin crew, or other passengers, should not approach the [service] animal. Food and water only should be provided at the master’s [assisted passenger’s] request.”⁶

Policy-guidance material issued in 2003 by the U.S. Department of Transportation (DOT) said that in 1990, most service animals were guide dogs or hearing dogs. Since then, the variety of species (e.g., cats, monkeys and miniature horses) used as service animals has increased.

“These developments can make it difficult for airline employees to distinguish service animals from pets, especially when a passenger does not appear to be disabled, or the animal has no obvious indicators that it is a service animal,” the DOT guidance said. “Passengers may claim that their animals are service animals at times to get around airline policies that restrict the carriage of pets.”

Government agencies, airlines, passengers with disabilities and other interest groups periodically confront evolving problems in ensuring compliance with cabin-safety requirements and with laws that specify accommodations in public transportation for passengers with disabilities.⁷ For flight attendants, this challenge is compounded by the variety of service animals and restrictions on information that flight attendants may require from passengers with disabilities.

In most situations, the key difference between a service animal and a pet is that the service animal “has been individually trained to perform functions to assist the passenger who is a qualified individual with a disability,” said DOT.

“In a few extremely limited situations, an animal such as a seizure-alert animal may be capable of performing functions to assist a qualified person with a disability without individualized training,” DOT said. “Also, an animal used for emotional support need not have specific training for that function.”

DOT regulations essentially require air carriers to allow service animals to accompany a qualified individual with a disability at the location of any seat in which the assisted passenger sits,

unless the animal obstructs an aisle or other area that must remain unobstructed to facilitate an emergency evacuation or to comply with U.S. Federal Aviation Regulations (FARs).

One U.S. air carrier, in advice to passengers about service animals, said, “We have found that most service animals easily fit under the seat of the human companion, along the fuselage with the human companion located in a window seat, or along the windscreen in front of a bulkhead seat.”⁸

DOT regulations also require flight attendants to offer specified alternatives when a service animal does not fit at the originally assigned seat location.

“You should relocate the passenger and the service animal to some other place in the cabin in the same class of service where the animal will fit under the seat in front of the passenger and not create an obstruction, such as the bulkhead,” the DOT guidance document said. “If no single seat in the cabin will accommodate the animal and passenger without causing an obstruction, you may offer the option of purchasing a second seat, traveling on a later flight or having the service animal travel in the cargo hold.”

Guidance material for Canadian air carriers said that the cabin crew also must consider whether the placement of a service animal “would interfere with the ability of a crewmember to carry out his/her assigned duties in an emergency evacuation ... [such as] where the flight attendant must assess an exit’s exterior conditions through a cabin window that is adjacent to the exit.”⁹

FAA Guidance Clarifies Cabin Crew Issues

In a 2004 bulletin, the U.S. Federal Aviation Administration (FAA) provided air carriers clarifications about safely accommodating service animals during operations under FARs Part 121, air carrier operations, and Part 135, commuter and on-demand operations.¹⁰

FAA said, “The variety of service animals, as well as the services these animals perform, has certainly become larger in scope since the FAA’s policy was first published in 1977. However, after a comprehensive review of available [U.S.] National Transportation Safety Board (NTSB) data, the FAA sees no safety issue that compels the FAA to change its longstanding safety and enforcement policy regarding placement and location of service animals on aircraft.”

FAA reviewed several reports on fatal commercial aircraft accidents and reviewed safety studies of aircraft evacuations and accident survivability.¹¹

“[These reviews] found no references to either a service animal’s presence on the aircraft or its placement or location on

the aircraft, to have negatively impacted an aircraft evacuation or a particular individual's emergency egress from an aircraft," FAA said.

FAA's guidance in the bulletin included the following acceptable practices:

- "A service animal may be placed at the feet of a person with a disability at any bulkhead seat or in any other seat as long as when the animal is seated/placed/curled up on the floor, no part of the animal extends into the main aisle(s) of the aircraft, the service animal is not at an emergency exit seat and the service animal does not extend into the foot space of another passenger seated nearby who does not wish to share foot space with the service animal;
- "Lap-held service animals (such as a monkey used by a person with mobility impairments) are discussed in the preamble to [DOT Part 382].¹² They are service animals that need to be in a person's lap to perform a service for that person. This service animal may sit in that person's lap for all phases of flight including ground movement, takeoff and landing provided that the service animal is no larger than a lap-held child (a child who has not reached his or her second birthday);
- "[Certain] unusual service animals pose unavoidable safety and/or public health concerns, and airlines are not required to transport them. Snakes, other reptiles, ferrets, rodents and spiders certainly fall within this category of animals.¹³ The release of such an animal in the aircraft cabin could result in a direct threat to the health or safety of passengers and crewmembers. For these reasons, airlines are not required to transport these types of service animals in the cabin, and carriage in the cargo hold will be in accordance with company policies on the carriage of animals generally; [and,]
- "Other unusual animals such as miniature horses, pigs and monkeys should be evaluated on a case-by-case basis. Factors to consider are the animal's size, weight, state [restrictions] and foreign country restrictions, and whether or not the animal would pose a direct threat to the health or safety of others, or cause a fundamental alteration (significant disruption) in the cabin service. If none of these factors apply, the animal may accompany the passenger in the cabin. In most other situations, the animal should be carried in the cargo hold in accordance with company policy."

From a cabin-safety standpoint, the behavior of the service animal is significant, and the service animal's status can be forfeited because of inappropriate behavior.

"Service animals are trained to behave properly in public settings," said the DOT guidance document. "For example, a

properly trained guide dog will remain at its owner's feet. It does not run freely [on] an aircraft or an airport gate area, bark or growl repeatedly at other persons on the aircraft, bite or jump on people, or urinate or defecate in the cabin or gate area. An animal that engages in such disruptive behavior shows that it has not been successfully trained to function as a service animal in public settings. Therefore, airlines are not required to treat it as a service animal, even if the animal performs an assistive function for a passenger with a disability or is necessary for a passenger's emotional well-being."¹⁴

U.S. airline personnel assess the status of service animals in two basic categories: animals other than emotional-support animals (such as guide dogs) and emotional-support animals. Animals in both categories generally can accompany the passenger in the cabin. The difference is how airline personnel determine whether a specific animal qualifies for this treatment under laws, regulations and policies. Some service animals wear harnesses, vests, capes, collar tags or backpacks that assist — but are not definitive — in distinguishing them from pets. Not all service animals wear such identification, however.

Emotional-support Animals Require Documentation

In general, U.S. airline personnel only will require documentation — such as a letter from a licensed professional treating the passenger's condition — for animals other than emotional-support animals if the passenger's verbal assurance of the animal's purpose is not credible.

When passengers intend to travel with an emotional-support animal, however, DOT said that the airline personnel may require — as a condition of permitting the animal to accompany the passenger in the cabin — documentation less than one year old on letterhead from a mental health professional stating "that the passenger has a mental health-related disability; that having the animal accompany the passenger is necessary to the passenger's mental health or treatment or to assist the passenger (with his or her disability); and that the individual providing the assessment of the passenger is a licensed mental health professional and the passenger is under his or her professional care." Nevertheless, airlines cannot require the passenger's documentation to specify the mental health disability.

Training prepares cabin crews to know the current rights of passengers, to know appropriate questions to ask to determine the status of a passenger and/or animal, and to obtain information relevant to applicable regulations and cabin-safety procedures.

Ideally, training also prepares cabin crewmembers to recognize expected behavior vs. unexpected behavior from the assisted passenger and the service animal, and to anticipate the safety implications for an emergency situation.

The Global Aviation Information Network (GAIN) program's guidance for cabin crews about service animals included the following recommendations:¹⁵

- "A service animal should be considered acceptable if it is free of odor and parasites, well mannered and harnessed, and kept at the owner's feet for the duration of the flight; and,
- "[In an emergency evacuation involving a service animal,] cabin crew should instruct the passenger to hold the [animal in his/her] lap when exiting via an escape slide. Should the animal and passenger become separated, the animal should be led to the top of the slide and pushed down, after the passenger has left the aircraft." Pulling the service animal onto the passenger's lap, if possible, also helps to prevent its claws, teeth, harness or collar from tearing the slide and helps the passenger to keep control of the animal.

Assisted passengers and their service animals often have received specific training on preflight preparation and in-flight practices for safety and comfort.

"Smaller dogs can usually fit under airline seats, which may provide them with a more secure ride," said an advisory document for airline passengers by the Australian Civil Aviation Safety Authority. "However, for larger dogs, bulkhead seats may be a better option. ... Try to avoid sedating your dog as drug reactions may differ at high altitudes and can lead to illness. ... Once you get to your seat, it is recommended by many that the dog's harness be removed. This allows the dog better ease of movement and avoids the harness catching on objects around the seat."¹⁶

Guidance from Transport Canada, however, said that during flight, the service animal must remain harnessed. Cabin crews must resist the temptation to provide a more comfortable place for a service animal during the cruise phase, the Canadian advisory document said.

"Depending on the aircraft configuration, seats at emergency exits or in emergency exit rows may have more leg room or foot space or there may be a vacant area adjacent to these seat(s) and the emergency exit," Transport Canada said. "Air operators are ... cautioned against relocating passengers with service animals to these seats for the cruise portion of flight. Circumstances prior to descent (e.g., turbulence, in-flight emergency) may prevent the passenger and service animal from safely returning to the assigned seat for landing. To avoid accidental injury, care should be taken to ensure that the animal's extremities are not protruding into the aisle at any time."

According to the Delta Society, a U.S. organization that specializes in service animals and travel issues, passengers should plan each flight with the animal's individual characteristics and limitations in mind.

"Some service dogs adapt well to new environment, schedules, food and water; others become distracted or stressed," said a Delta Society publication. "This can affect their ability to work, their needs to eliminate, their appetites and their dispositions. ... Discuss [with a veterinarian] how to recognize and treat motion sickness (and altitude sickness if you will be at high altitudes) in your dog. ... Ask how long to withhold food and water before and during traveling, to reduce the dog's need to eliminate. ... Teaching your dog to eliminate on command, and to [eliminate] in a variety of situations will help you overcome any obstacles to meeting your dog's toileting needs. Teaching your dog to eliminate on newspapers and into a super-absorbent diaper will give you options to use no matter where you are. Place a plastic bag under the [absorbent material] to protect the surface below and to make cleanup easier."¹⁷

Service Animal's Behavior May Be Misinterpreted

Although not required by DOT, some assisted passengers find that preboarding an empty airplane is easier for the service animal and more convenient for the other passengers, and simplifies any seating changes that the cabin crew may require, said one article aimed at U.S. passengers who are blind.¹⁸

If a dispute arises between an airline employee and a passenger about the status of a service animal, U.S. flight attendants are expected to consult immediately, if possible, with the on-duty complaint-resolution official (CRO), an employee designated under the DOT regulations to make related operational decisions.

"In the rare instance that a service animal would raise a concern regarding flight safety, the CRO may consult with the pilot-in-command," the DOT guidance document said. "If the pilot-in-command makes a decision to restrict the animal from the cabin or the flight for safety reasons, the CRO cannot countermand the pilot's decision. This does not preclude [DOT] from taking subsequent enforcement action, however, if it is determined that the pilot's decision was inconsistent with Part 382.

"Do not make assumptions about how a particular unusual animal is likely to behave based on past experience with other animals. You may inquire, however, about whether a particular animal has been trained to behave properly in a public setting. Before deciding to exclude the animal, you should consider and try available means of mitigating the problem (e.g., muzzling a dog that barks frequently, allowing the passenger a reasonable amount of time under the circumstances to correct the disruptive behavior, offering the passenger a different seat where the animal won't block the aisle)."

Guesses also may prove to be wrong about what appears to be disruptive behavior by a familiar type of service animal.

“First, find out what happened before taking action [if a service dog barks, growls or whines, for example],” said the Delta Society publication. “Maybe someone stepped on the dog’s tail, causing it to yelp. Also, the dog may have barked in response to the handler’s medical condition. Finally, if the service dog’s behavior is disruptive or destructive, you may ask the handler to remove it from the [location].”¹⁹

Except for service animals, U.S. air carriers are free to adopt any policy they choose regarding the carriage of pets and other animals. Service animals in training and service animals that are not accompanying the assisted passenger do not have the official status of service animals, so airline policies vary on transporting them. ♦

Notes

1. Adams, Kristina; Rice, Stacy. “A Brief Information Resource on Assistance Animals for the Disabled.” Animal Welfare Information Center, U.S. Department of Agriculture (USDA). April 2004. <www.nal.usda.gov>.
2. U.S. Department of Transportation (DOT). *Policy Guidance Concerning Service Animals in Air Transportation*. Federal Register, Vol. 68, 24875, May 9, 2003.
3. Transport Canada. *The Carriage of Service Animals in Canadian Commercial Airline Operations*. Air Carrier Advisory Circular no. 0121. May 15, 1997. Canada defines a service animal as “an animal that is required by a person with a disability for assistance and is certified, in writing, as having been trained to assist a person with a disability by a professional service animal institution.” Among criteria for acceptance of the service animal is a requirement that “the animal must be properly harnessed in accordance with the standards established by a professional service animal institution. ... Often service animals wear a special collar or patch attached to their harness that indicates the animal is ‘on duty.’”
4. Delta Society. “Traveling With a Service Dog.” “Who Service Dogs Can Help.” “Facts You Should Know About Service Dogs.” <www.deltasociety.org>. This organization is involved in improving human health through service animals and therapy animals, and operates the U.S. National Service Dog Center, an Internet-based source of information and resources for people with disabilities. Its publications said that service dogs have been used to benefit people with disabilities associated with many diagnoses, including “spinal cord/head trauma (injury, stroke); visual or hearing deficits; arthritis; ataxia/poor balance; multiple sclerosis; cerebral palsy; muscular dystrophy; spina bifida; seizure disorders; cardiopulmonary disease; arteriovascular disease (primary or secondary to diabetes, etc.) [and] psychiatric disabilities.”
5. Transport Canada.
6. International Air Transport Association. *Inflight Management Manual*, Second Edition, Effective 1 July 2002–30 June 2003.
7. For example, DOT Part 382, *Nondiscrimination on the Basis of Disability in Air Travel*, has been amended 10 times since it was first issued in March 1990. March 4, 2005, was the closing date to receive the most recent public comments on proposed rulemaking — including changes affecting service animals — for further Part 382 amendments.
8. Southwest Airlines. “Traveling Tips for Customers With Disabilities: Service Animals.” <www.southwest.com>.
9. Transport Canada.
10. U.S. Federal Aviation Administration (FAA). Flight Standards Information Bulletin for Air Transportation (FSAT) no. FSAT 04-01A, “Location and Placement of Service Animals on Aircraft Engaged in Public Air Transportation.” July 23, 2004.
11. FAA. The reviews comprised aircraft accidents with at least one fatality in operations under U.S. Federal Aviation Regulations Part 121 (air carrier operations) that occurred between Jan. 1, 1990, and Jan. 1, 2004, contained in the U.S. National Transportation Safety Board (NTSB) reporting system; NTSB Safety Report NTSB/SR-01/01, *Survivability of Accidents Involving Part 121 U.S. Air Carrier Operations, 1983 Through 2000*; and NTSB Safety Study NTSB/SS-00/01, *Emergency Evacuation of Commercial Airplanes*.
12. Issued in 1990 in *Federal Register*, Vol. 55, No. 44, 361990, page 8042.
13. DOT. Whether or not they are used as emotional-support animals, DOT allows airlines to bar snakes, other reptiles, ferrets, rodents and spiders as service animals because the safety threat for all occupants of the aircraft outweighs the individual passenger’s requirements. Adams and Rice. “An even greater number of animal species [than dogs] serve as [social/therapy] animals, including rabbits, hamsters and snakes,” said the USDA authors’ review of health care literature. “Social/therapy animals provide emotional support in places such as elder-care facilities and hospitals.” Cobey, Michelle. Telephone interview by Rosenkrans, Wayne. Alexandria, Virginia, U.S. March 16, 2005. Flight Safety Foundation, Alexandria, Virginia, U.S. Cobey, resource coordinator of the Delta Society, said that among the DOT-identified animals, her organization has evaluated and registered a few “teams” — comprising a trained rodent (such as a mouse, rat or guinea pig) and a trained handler — that provide animal-assisted activities in these types of places, and animal-assisted therapy for various educational/therapeutic purposes. The therapy may be part of a health care professional’s treatment plan for individuals with a psychiatric disability or other disability (i.e., not for the handler). Based on queries, the Delta Society has found some public misunderstanding of relevant laws/regulations and confusion about the distinction between these rodents and service animals, Cobey said.
14. DOT.
15. Cabin Safety Team, Operator Safety Practices Working Group, Global Aviation Information Network (GAIN) Program. *Cabin Safety Compendium*, Issue 1, A Companion to the *Operator’s Flight Safety Handbook*. December 2001.
16. Civil Aviation Safety Authority (CASA), Australia. “Travel Tips for People Who Are Blind or Vision Impaired.” In “Disabled Travellers — A Guide for Airline Operators,” CASA said, “Guide dogs are given medication to stop them from urinating during a flight.” <www.casa.gov.au>.
17. Delta Society.
18. “Learning About Blindness: Air Travel.” *Guide Dog News*. Fall 1998. Guide Dogs for the Blind <www.guidedogs.com>.
19. Delta Society.

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