

## **Accommodating Pets in the DSS Shelter System**

in response to Local Law 96 of 2021

Submitted to **Speaker Adrienne Adams** 

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## **Section 1: Executive Summary**

The Department of Homeless Services provides temporary shelter to approximately 45,000 New Yorkers in need every day (see Sections 2-7). Additional shelter capacity totaling nearly 2,400 emergency beds and over 500 Tier II units specifically for survivors of domestic violence is maintained by the Human Resources Administration (see Section 8). This constitutes the largest organized mass sheltering operation in the world. This is a critical service that requires massive resources, considerable planning, and well-tuned coordination to ensure the emergency needs of otherwise unsheltered individuals are consistently met. To meet the demand of so many New Yorkers requiring emergency shelter, DHS must operationalize practices in a way that ensures shelter is available to all those in need.

Sheltering a population proportionate to a small city is a monumental task; adding the wide variety of animal species kept as pets while supporting the welfare of both human and animal complicates this task significantly. The existing shelter system was not designed to accommodate animals, so universal accommodation of pets will increase the burden on the facilities within the system and necessarily impact the agency's primary objective of responding to emergency sheltering needs of humans. To appropriately accommodate pets in shelter, new shelter sites will be necessary, as will upgrading of existing facilities. Nevertheless, stories of success are beginning to emerge around the country, from co-sheltering arrangements in Florida and Los Angeles to a local example in the Urban Resource Institute's PALS (People and Animals Living Safely) facility. And DHS believes some of the units in the shelter system will lend themselves more easily to this effort than others. Specifically, the family units with their own bathrooms will be more easily transitioned to this potential requirement than will the single adult congregate sites, for example. Still, nowhere in the world has co-sheltering been attempted on such a massive scale.

This report serves as an overview to many of the considerations integral to crafting a potential implementation plan for the accommodation of pets in DHS shelter.

#### **Existing Processes and Resources**

DHS is already accommodating service dogs and emotional support animals and has created policies to help clients with disabilities coming into shelter with the supports they need. This includes a resource list that staff use to help clients with pets find alternate placement when necessary, as well as services like pet food banks and veterinary clinics for clients with support animals.

In preparation for drafting this report, the Agency released a survey to shelter providers to gather information on existing experience, potential barriers, and concerns related to accommodating pets in shelter. Many of these responses followed along three basic lines:

- Many facilities will require updates to accommodate pets.
- Providers need additional hygiene and cleanliness supports.
- Accommodations must consider quality of life for humans and animals.

## **Implementation**

Co-sheltering people experiencing homelessness and their pets in such a large scale presents a variety of challenges, each of which must be planned for and overcome in a way that properly prepares every person involved – including those specializing in security, case management, accounting, policy, and more.

Policies set up without this care can place an undue burden on some staff over others and can add significant responsibilities without the required resources needed to succeed. This can ultimately lead to uneven application of policy and new obstacles to implementation.

The challenge in implementation will be providing sufficient resources and support and implementing the new policy evenly so as not to overwhelm any one service provider or facility. Overcoming this challenge will be possible with technical assistance, strong collaboration, and appropriate resources, including new shelter sites, facility upgrades, and amended budgets to support the additional responsibility.

## **Section 2: Background Information**

The following information in this section constitutes a brief overview, including terms used throughout this document, the categories used to define types of pets and unit types for the purposes of this report, the objectives and results of a survey sent out to shelter directors the DHS system in partial response to the requirements of the local law, and an overview of the implementation of new pet-related questions asked of clients at intake.

#### **Terms**

All terms are defined solely for the purpose of clarity within this report and may have additional meaning in different operational contexts including existing DSS/HRA/DHS policies and procedures or documents authored by other governmental, non-profit, or advocacy organizations.

## Companion Animal

Any animal legal to own in New York City that is kept for the purpose of providing companionship.

#### Emotional Support Animal (ESA)

Any animal legal to own in New York City that has been certified by a qualified professional to provide a needed emotional support to their owner.

#### Service Dog

A domestic dog that has been trained to perform specific tasks to assist a person with a disability.

#### Co-Sheltering

The process of enabling people and their companion animals experiencing homelessness to enter and remain in shelter together.

#### **Considerations**

DHS facilities vary widely in location, capacity, layout, and amenities. While this variability is one of the system's strengths, it adds an additional challenge in introducing broad changes like the accommodation of companion animals. Adding to this complexity, pets also vary widely in their size, behavior, and needs.

To add clarity to the planning process, DHS used the following categories of units and pets. Note that these definitions are only for the purpose of this report and may have different meanings in other contexts, including standard DHS operations:

## **Types of Units**

#### Family

A unit occupied by one family. All Families with Children and Adult Families facilities are comprised of family units.

## Single or Double

A unit occupied by one or two single adults.

#### Lower Capacity Congregate

A unit occupied by three to five single adults.

## Higher Capacity Congregate

A unit occupied by six or more single adults.

## **Types of Pets**

#### Dogs

While they vary widely in temperament and size, healthy dogs generally have the same requirements as humans regarding indoor living space, as they can be exercised and trained to eliminate outdoors. Dogs require substantial social interaction to maintain their well-being.

#### Cats

Domestic cats do not vary much in size, but vary widely in temperament, and often respond with fear to new environments or environments populated by many unfamiliar individuals (and potentially numerous pets). Physical needs to consider include space for a litter box and objects to scratch.

#### Birds

Birds vary in temperament and size; parrots in particular require a great deal of care. Birds are considered delicate pets due to their vulnerability to differing ventilation and heating and cooling systems and their tendency to behave self-destructively under stress.

#### **Small Mammals**

A broad category that includes animals such as mice, guinea pigs, and rabbits, small mammals require an enclosure that needs regular cleaning, and they may also need exercise outside that enclosure. Other specialized needs vary by species.

#### Animals in Tanks

A broad category including fish, reptiles, and amphibians, pets in tanks often need heaters or water filtration, and the tanks themselves require regular maintenance and cleaning. Many reptiles and amphibians need specialized diets, which may include live food or food that requires storage in a refrigerator or freezer.

## **Provider Survey and Results**

In response to the local law directing DHS to begin the planning process for possible accommodation of pets in shelter, DHS released a survey to all shelter directors in its network. The goals of the survey were to:

- understand concerns and barriers providers saw to accommodating pets,
- learn which, if any, provider-operated shelters already allowed pets,
- learn whether providers believed they could accommodate pets and, if so, what types, and
- learn which shelters already had experience with animals, including companion animals.

The survey received responses representing 268 facilities. Of these, more than half were either Families with Children or Adult Families facilities, and a third represented Single Adult shelters. The remaining responses represented Street Homeless Solutions' operations: safe havens, dropin centers, stabilization bed sites, and street outreach.

This survey most directly informed Section 4 of this report: Barriers and Solutions, which in turn informed the analysis of the concrete implementation supports needed to meaningfully accommodate companion animals in shelter.

## **General Findings**

Across all responses, three concerns stood out most, both in strength and frequency. These are described in brief below; see Section 4: Barriers and Solutions for more information.

#### Space/Facilities

A broad assortment of concerns relating to space for pets and the supplies needed to care for them and to other facility needs such as carpet removal.

## Hygiene and Sanitation

Concerns for animal hygiene (pet bathing and supply cleaning) and the cleanliness of individual rooms and the facility as a whole, especially in congregate settings and facilities with shared rooms.

## Quality of Life

Concerns for staff and clients, especially children or those with allergies or phobias, as well as concern for the well-being of animals.

## **Client Questionnaire**

In January 2022, DHS released a series of new intake questions for clients designed to fulfill the requirements of Local Laws 96 and 97 of 2021. These questions were implemented at the Office of Prevention Assistance and Temporary Housing (PATH), the Adult Family Intake Center (AFIC), and at the men's and women's intake centers.

Note: DHS is in the process of updating its system of record, CARES. The updated version is scheduled to go live in CY22. When the updated version of CARES is live, DHS will incorporate the pet related intake questions into CARES.

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#### **Section 3: Policies and Resources**

DHS policies regarding animals are currently limited to regulations and requirements for emotional support animals and service dogs. Each site director at provider-operated shelter facilities sets their own rules regarding companion animals but must make every effort to accommodate emotional support animals and service dogs when clients assigned to the facility possess such animals, or must work with DHS to identify appropriate alternate placement. DHS directly-operated sites do not allow pets. In general, shelter providers do not allow pets, although some make accommodations on a case-by-case basis, especially when a client is in the process of making a reasonable accommodation request to register their animal as an emotional support animal.

## **Current DHS Policies Involving Animals**

<u>Desk Guide for Working with Clients Who have an Approved Emotional Support Animal</u> DHS-58a (E); 9/18/2020

A reference guide for staff on the regulations and policies for approved Emotional Support Animals.

## Service Animal or Approved Emotional Support Animal Emergency Plan

DHS-58b (E); 7/17/2020

Notes each animal's identifying information and emergency contacts for shelter records in the event of an emergency.

# Notification of Requirements for Clients with an Approved Emotional Support Animal DHS-58c (E); 7/17/2020

Notes each animal's identifying information and lists care, control, and safety expectations for owners of Emotional Support Animals.

#### DHS Client Referral for Animal Care

DHS-58d (E); 7/17/2020

Lists resources for clients who need to find temporary shelter for their animal; also lists pet food banks, spay/neuter clinics, and licensing and vaccination events and information.

#### Client Service Dog Policy and Procedure

DHS-PB-2020-013; 9/29/2020

Outlines DHS' legal responsibilities regarding service dogs.

## **Facilities Currently Accommodating Animals**

In response to the survey released to shelter providers, roughly 10% of existing shelter sites indicated they were accommodating animals at the time of the survey. The necessary fluidity of the system means feasibility of animal accommodation today might change tomorrow for any number of reasons, including facility closure, increased capacity demands, etc. In the event of future planning for pet accommodation, the Agency's insight into sites with experience

accommodating animals will help DHS efficiently identify providers under contract who might be best positioned to accommodate pets.

#### **Section 4: Barriers and Solutions**

Accommodating companion animals in DHS shelter presents substantial challenges. While service dogs or emotional support animals have been accommodated, this has been on a small scale with few facilities accommodating more than four animals at a time, if any. The barriers laid out in this section were drawn from feedback collected in the survey of providers and from the health and safety review by the DHS Office of the Medical Director. For more in-depth information related to health and safety implications, see Section 5.

Solutions listed in this section may not apply to all facilities and will apply differently to facilities across DHS' divisions. Barriers are listed in approximate order of greatest to least concern, in the sense of the frequency with which they were directly mentioned in survey responses.

#### **Barrier 1: Inadequate Facilities**

DHS facilities provide adequate space for a person or family with a few personal effects (generally limited to those necessary for basic activities of daily living) in order to ensure capacity to serve all clients requiring assistance. While some facilities and units offer additional features to account for special needs or limitations, including accommodating emotional support animals, the system is designed to accommodate the emergency needs of humans. The system was not designed to accommodate animals, so universal accommodation of pets will increase the burden on the facilities within the system and necessarily impact the agency's primary objective of responding to emergency sheltering needs of humans. To appropriately accommodate pets, the shelter census at participating facilities must be reduced to adequately attend to the additional responsibilities and requirements associated with the accommodation of pets. This will require new shelter sites to be opened.

Companion animals have a variety of needs defined not only by species but also by breed, type, age, and health condition. In the same way that our social service systems must be responsive to diverse needs, our physical facilities must become more adaptive if we are to meaningfully accommodate pets.

#### **Basic Living Requirements**

Species of animals require a variety of accommodations to share human living spaces. For example, electrical outlets are necessary to power fish tank water pumps and heaters or heating sources for cold-blooded animals. Birds and some small mammals suffer if exposed to slight drafts. Many DHS facilities would require updating to make these accommodations.

#### Living Space

While DHS can and must outline expectations for animal care and handling, animals subjected without reprieve to an environment populated by many unfamiliar individuals (and potentially

numerous pets) will react in ways that may be detrimental to the health of the animal or disruptive to facility operations.

## Supply Storage Space

Specific supply storage needs vary depending on the species and number of pets involved. As an example, minimal food and care supplies for a single cat or dog could easily fill a 30-gallon storage container. Many facilities already struggle with storage capacity for basic necessities like cleaning products, staff workspace, and client belongings.

## Hygiene and Sanitation

While in a private home a dog may be bathed in a shower or bathtub or food bowls cleaned in a kitchen sink, pet hygiene and sanitation needs in congregate shelter or facilities with shared rooms must be taken care of in washrooms that are not used for human hygiene or food preparation. No single adult shelters are currently equipped to accommodate this need.

#### **Solutions:**

- Reduced density in shelters, which would require opening new sites
- Conversion of some higher capacity congregate rooms to lower capacity congregate rooms or single or double rooms
- Conversion of some rooms to storage space
- Addition of utility sinks or dedicated washing stations
- Pet-specific facility codes
- Electrical wiring upgrades
- Carpet removal
- Limiting the number of pets per client or household

#### Barrier 2: Staff or Client Fear or Phobia

Many people, whether as a result of unfamiliarity, negative stereotypes or experiences, or past trauma, fear certain types of animals. This added stress can contribute to an unhealthy shelter environment and could result in incidents. Some animals may respond defensively to fear in humans, which could result in bites or scratches.

## **Solutions:**

- Strategic placement
- Designated pet-free shelters
- Regular education or outreach from partner organizations or dedicated animal advocate staff
- Staff reassignment options

## **Barrier 3: Staff or Client Allergies**

Many people have allergies or sensitivities to certain animals. Some experience allergies severe enough to threaten their health or even their lives. These allergies are most commonly to animal dander but may also be a response to animal saliva or urine.

## **Solutions:**

- Strategic placement
- Designated pet-free shelters
- Increased facility cleaning
- Improved air quality
- Staff reassignment options

## Barrier 4: Animal Neglect, Abandonment, or Inadequate Care

Some pet owners may be unable to properly care for their pet. This may be due to financial hardship or limited time due to work and school schedules, required appointments, and housing search efforts, for instance. Alternately, it may be a result of an inability or unwillingness to meet expectations for animal hygiene and cleanliness or inability to complete Activities of Daily Living (ADLs). This care includes hygiene, cleanliness, exercise, adequate time outside crate, proper medical care, and vaccination. Clients may also exit shelter and leave their pets behind (documented instances of abandoned ESAs have already occurred in shelter) or may become unable to care for their pets because of hospitalization.

#### **Solutions**:

- Clear written care and cleanliness guidelines
- Dedicated staff to monitor and assess animal welfare
- Alternate contact for animal care required of clients in the event of owner incapacitation, neglect, or abandonment
- Established budget and partnerships with animal welfare organizations to provide:
  - o Supplies
  - o Education
  - Veterinary care
  - o Rapid placement for neglected or abandoned animals

## **Barrier 5: Obstacles to Rehousing**

DHS clients already struggle to find housing outside the shelter system. Many landlords have policies that disallow pets, or may impose restrictions on number, breed, type, or weight. Other landlords may require pet rent or an additional security deposit for animals, imposing an additional hardship on clients who already struggle to afford rent.

#### **Solutions:**

- Pet security deposit and/or rent vouchers
- Partnerships with pet-friendly landlords

## **Section 5: Health and Safety**

While companion animals are an indispensable part of the lives of many, co-housing humans and animals requires mitigation of health and safety risks especially on an institutional scale.

The following section notes general impacts and specific health and safety considerations, and recommendations for addressing each. Note that many of these considerations are interrelated and are also reflected in Section 4.

## **Positive Impacts of Pet Ownership**

Pet ownership is associated with positive physical health markers including decreases in blood pressure, cholesterol levels, and triglyceride levels, as well as positive mental health experiences including decreased feelings of loneliness, anxiety, and symptoms of PTSD.

Pet ownership can also be associated with better cognitive function in older adults, more opportunities to socialize, and increased opportunities for exercise and outdoor activities.

## **Potential Negative Impacts**

Ownership of companion animals does not necessarily lead to negative health and safety impacts. A combination of factors influences the likelihood that any negative impact will be experienced. These factors include:

- Health conditions of human and animal
- Traumatic experiences of human or animal
- Owner's experience and expertise in the care and handling of the particular animal species
- Owner's understanding of the animal's temperament and ability to respond to and modify undesired behavior
- Day to day living conditions and stressors

## Allergens

Pet allergy responses are caused by a reaction to proteins found in an animal's skin cells, saliva, or urine. Typical signs of pet allergies include sneezing and runny nose, watery eyes, and itching. Some people may also experience signs of asthma, such as wheezing and difficulty breathing. Most often, allergic reactions are triggered by exposure to the dander (dead flakes of skin) an animal sheds. While pet allergies are most commonly associated with cats and dogs, any animal can be a source of allergens. In addition to avoiding or reducing exposure to the animal, minimizing contact with animal saliva, dander and/or urine helps to mitigate allergic responses. Medications or other treatments may be necessary to relieve symptoms and manage asthma.

#### Recommendations:

- Minimize dander and shed hair by grooming/bathing the animal and cleaning bedding frequently.
- Use high temperatures to kill bacteria and detergent to remove allergens when laundering bedding, clothing, and other washable items (including dog beds).
- Replace carpet with smooth flooring (e.g., wood, tile, linoleum).
- Clean with wet supplies such as damp cloths and mops rather than "dry" cleaning (with brooms or feather dusters), which can send pet allergens settled on surfaces into the air.
- Vacuum at least once a week with a vacuum cleaner equipped with a HEPA filter to
  prevent outflow of the contents (including pet allergens) that have been swept up. For
  smooth floors, avoid vacuums with a beater brush.
- Use an air purifier with a HEPA filter in the room the pets spend the most time to reduce the concentration of allergens in the air.

## Hygiene, Waste, and Sanitation

Maintaining healthy conditions in shelter requires regular cleaning and disinfection. Cleaning removes excessive amounts of dirt and debris, and disinfection reduces or eliminates concentrations of microorganisms. Pet waste can carry bacteria or parasites that can make people sick. Feces from pets can also contaminate waterways and harm the environment.

#### Recommendations:

- Do not clean cages, habitats, and supplies in a kitchen sink, food preparation areas or the bathroom sink. When possible, wash them outside, or in a dedicated utility sink. If that is not possible, clean them in a bathtub and disinfect the area immediately afterward.
- Scoop cat litter multiple times each day, especially if anyone in the unit is pregnant, and scrub the litter box weekly or when there is any noticeable odor
- Wash hands after touching or playing with a pet, handling pet food or equipment, and after picking up pet waste.
- Always remove dog waste promptly. Remove feces by using a bag and keep children away from areas that might contain dog or cat feces to prevent transmission of roundworms or hookworms.

#### Pests and Disease

Household pets of all types can carry diseases or parasites that make people sick. The chemicals used to get rid of pests can also cause health problems. Pesticides can cling to surfaces and are dangerous to people and pets if not properly used. Pet waste and/or litter may attract bugs and rodents, which can contaminate food, damage homes, and make asthma and allergies worse. Deworming, vaccinating, and using flea control products (as recommended by a veterinarian) can keep pets healthy and decrease the risk of transmitting parasites or diseases. Some common illnesses among house pets cannot be spread to people, including distemper, canine parvovirus, feline immunodeficiency virus (FIV), and heartworms, but care must still be taken as some illnesses can be spread to people (psittacosis from birds, for example).

#### Recommendations:

- Keep all pet food securely contained in rat-proof containers.
- To prevent fleas on pets, limit the amount of time the pet spends outdoors, and bathe and brush them regularly.
- To prevent pets from contracting worms, have puppies and kittens dewormed by a veterinarian at an early age (more than one treatment may be needed). If recommended by a veterinarian, start or keep pets on a drug program that prevents, treats, and controls worms.
- Children should wash their hands with soap and water after playing with animals, after outdoor activities, and before handling food or eating.
- Avoid touching soil, sand, plants, and other objects that might be contaminated by animal feces, and keep play areas, lawns, and gardens free of animal feces.
- Households with children younger than 5 years old or those with infants or an immunocompromised person should not have pet reptiles, amphibians, or birds and shouldn't be around cats or dogs with ringworm.
- Children with eczema should avoid aquariums.
- Pregnant women should avoid adopting a new cat or handling a stray cat, especially kittens, and handling cat litter, and should avoid contact with pet rodents.
- Wash cat bites and scratches well with soap and running water and observe for redness, inflammation, and infection to prevent Cat Scratch Disease (CSD).
- Wash dog bites well with soap and running water and observe for redness, inflammation, and infection, and seek medical attention. The dog owner should exchange name, address, and phone number with the person bitten to help the Health Department follow up with the owner on the dog's health status.
- Rabies vaccination is the best way to protect pets against rabies and is required by law. In New York City, puppies and kittens must get their first rabies shot between 3 and 4 months of age and stay current on all subsequent boosters.

## **Injuries**

Any animal may become defensively aggressive as a response to feeling threatened or afraid. Among injuries caused by pets, dog bites are the most common. Children are most at risk of being bitten by a dog. Most bite injuries are from an owned pet, and young children are usually bitten by a dog that is familiar to them. Animals can also become more likely to bite or scratch due to stress or in response to territorial instincts.

#### Recommendations:

- Parents and caretakers should understand and teach children how to interact with animals and when to leave them alone.
- Dogs should be leashed and monitored in public places. In NYC, dogs in public must be on a leash no more than six feet long.
- Spay or neuter dogs to stop mating behaviors and reduce the risk of fights.
- Avoid overcrowding animals or placing predator/prey species near each other (for example: dogs and cats, cats and birds, reptiles and rodents).

•	Create a relaxing environment and provide quiet and low-stimulation places where animals can retreat or hide.

## **Section 6: Creating Accommodating Facilities and Programs**

This section lays out supports and updates that may be necessary to allow companion animals to enter shelter along with their owners in a way that maintains the welfare of clients, their pets, and facility staff. Not all supports would be necessary at all facilities, and some facilities may need additional supports suited to their particular challenges.

As co-sheltering is a relatively new practice adopted by few organizations, recommendations have been gathered from a variety of sources concerned with the welfare of humans and animals. Where possible, this included a particular focus on organizations that have adopted co-sheltering practices that might be applied to the DHS shelter system.

#### **Facilities**

Animals subjected without reprieve to an environment populated by many unfamiliar individuals (and potentially numerous pets) will react in ways that may be detrimental to the health of the animal or disruptive to facility operations.

#### New Facilities

New facilities acquired with the intention of co-sheltering humans and animals together.

- Greater proportion of single rooms and lower density congregate rooms in Single Adult facilities. Note that this will increase the number of shelter sites needed.
- Non-slip flooring without carpeting for ease of cleaning.
- Sufficient electrical outlets to support operation of heat lamps, filters, etc.
- Grooming station or room with pet-specific utility sink where only animal-safe cleaners may be used.
- Multiple access paths from area to area and floor to floor, to help clients or staff avoid encountering animals in the hallways when desired.
- Superior ventilation and air filtration to reduce allergens and eliminate odors.
- Kennel spaces in congregate facilities where dogs and cats cannot safely remain with their owners; kennel spaces in congregate facilities should be modifiable to allow multiple animals brought in together to reside together without excessive crowding.
- Multiple conveniently placed closets for cleaning supplies to quickly remove messes.
- Outdoor space; either at ground level or secure rooftop access.

#### Facility Updates

Changes to existing facilities to allow them to co-shelter humans and animals together.

- Take unit(s) offline to convert to space for animal housing, kennel space, or tank/cage space. Note that this will increase the number of shelter sites needed.
- Take unit(s) offline to convert to space for pet grooming or supply storage.
- Install grooming stations and/or pet-specific utility sinks.
- Install suitably-sized HEPA filters for common areas and areas with increased concentrations of animal allergens.

- Remove carpets and replace with smooth, non-slip floors that can withstand frequent cleaning.
- Add visual dividers between areas or kennels to reduce stress and prevent barrier aggression.
- Install dimmer switches or sound reduction panels in kennels to reduce overstimulation.
- Designate quiet areas owners can take pets to calm down when overstimulated.

#### Administration

Shelter staff working in facilities need support to meaningfully accommodate pets of people experiencing homelessness. Resources from DHS administrative divisions and partnerships with animal welfare and advocacy organizations can bridge the gap between what facility staff can provide and what companion animals and their owners need.

## **Policies**

- Expand existing policies to include and clearly distinguish between companion animals and emotional support animals or service dogs.
- Amend curfew policies to allow dog owners to take their dogs out to eliminate when needed.
- Develop a strategic placement plan to appropriately house clients according to their needs, including pet ownership, allergies or other sensitivities, and other factors as appropriate. Note that this will increase the number of shelter sites needed.
- Develop a plan for onsite staff with phobias or severe allergies to easily transfer to another role or another site if needed.
- Training on policy implementation.
- Increase familiarity through informational training on topics including basic knowledge of accommodated animals, information on prevention of transmissible diseases, and animal behavior.

## Partnerships with Animal Welfare and Advocacy Organizations to Assist with the Provision of:

- Supplies, including supplies for grooming/cleaning, enrichment, feeding, control (leashes/collars/etc.), and other supplies on an ad hoc basis as needed.
- Kennels/crates for transport, room inspections, or housing.
- Education to help staff and clients become familiar and comfortable with various types of resident animals and their behavior.
- Behavior assistance for owners with fearful or reactive animals to reduce the likelihood of incidents.
- Veterinary care including spay/neuter, vaccination, and treatment of common illnesses or conditions.

## **Implementation Overview**

Time to plan, dedicated resources, and collaboration with partner agencies and organizations are essential to making system-wide changes in a way that minimizes unforeseen consequences to DHS clients, shelter staff, and Agency operations.

The phases below are intended to serve as an overview and introduction to the tasks required in each stage. The stages themselves should be considered somewhat malleable as well, as elements of each phase may spill over into others in practice.

## Phase 1: Resource Gathering

- Assemble an advisory group consisting of co-sheltering advocates, representatives from key DHS divisions, and subject matter experts.
- Consult with providers to estimate costs of services, facility upgrades, and insurance requirements (see Section 7).
- Analyze available data to inform facilities planning. Data sources include:
  - o Reasonable accommodation requests for service/emotional support animals
  - o Results of new intake questions per Local Law 97
- Develop criteria and group shelter facilities by readiness and ability to accommodate or be updated to accommodate pets:
  - High No layout or capacity changes needed
  - o Medium Capacity changes or minor plant updates needed
  - o Low Facility unsuitable, or significant plant updates needed
- Identify volunteer cohort of high-readiness shelter providers to participate in planning and first-round implementation

## Phase 2: Assess and Plan

- Create capacity plan for pets across DHS system, accounting for various types of pets
  across all five boroughs and facility requirements to accommodate each type of pet at the
  needed capacities
- Project the number and types of pets that must be accommodated in each of DHS' divisions based on data from the pet-related questions asked at intake.
- Identify the number and types of pets that can be accommodated in each of DHS' divisions without structural changes to facilities.
- Identify the number and types of pets that can be accommodated in each of DHS' divisions only after facility upgrades are completed.
- Activate New Needs process to adjust DHS shelter model budgets for the purpose of updates related to accommodating pets in shelter (see Section 7)
- Draft RFP for new facilities designed to accommodate pets
- Instruct DHS providers to determine supply sourcing requirements and explore partnerships with other agencies and organizations to provide supplies
- Instruct DHS providers to create budget estimates for cost of supply increases and facility updates
- Instruct DHS providers to formalize relationships with partner organizations and agencies to provide pet supplies, veterinary referrals, placement options, and education/training, and determine the cost of necessary supplies that cannot be reliably provided through these channels

- Determine policy and procedural needs for accommodating pets in shelter; create new policies and materials
- Finalize implementation groups and rollout plan

## Phase 3: Implementation

- Finalize policy and procedural updates required to begin accommodating pets across the DHS shelter system
- Begin pilot implementation to volunteer providers identified during Phase 1
- Using facility groups developed during Phase 1, group remaining facilities into implementation phases, with higher-readiness shelters earlier in implementation
- Convene practice-sharing group for pilot cohort to share lessons learned and best practices with upcoming cohorts
- Prior to full implementation, consider any policy recommendations or other outcomes learned during pilot phase and strengthen implementation plan as needed
- Begin full-system implementation

## **Section 7: Contracting and Budget Process**

To meaningfully accommodate companion animals in shelter facilities, the Agency would need to adjust the contracts and budgets of existing service providers to address the barriers laid out in Section 4 and would need to acquire new facilities better suited for accommodating companion animals.

## **Update Existing Contracts**

Adjusting existing contracts and budgets requires a contract amendment, known as a New Needs request. The New Needs process is outlined more fully in the DHS Human Service Providers Fiscal Manual.

For non-emergency requests, providers submit a New Need request between January 1<sup>st</sup> and February 15<sup>th</sup>. Additional requirements, including a three-bid requirement, apply to New Needs greater than \$20,000, and a separate New Need request must be submitted for each type of request. For example, if a provider needed to both hire an animal welfare coordinator and install a washing station for pets and associated supplies, this would require two separate requests and review processes. The New Needs process requires submission of multiple bids and numerous levels of review across multiple City agencies.

Prior to beginning this process, DHS would need to work with all providers to determine which providers and facilities would be willing and suitable for updates to accommodate companion animals. An increase in the total DHS budget proportional to the expected requests is vital to ensuring facilities are able to complete the updates required to meaningfully accommodate pets.

Additional funding for technical assistance in the form of consultants from organizations that have contributed to co-sheltering projects would help identify suitable providers and facilities and clarify what updates are required at a given site. This would reduce the burden on both DHS and provider staff while providing much-needed expertise in co-sheltering at a time when best practices are not yet established.

## **Register New Contracts**

The process of opening a new shelter begins with identifying a suitable site. DHS would evaluate each potential site according to needs laid out in Section 6: Creating Accommodating Facilities and Programs. Facilities that already have the attributes needed or can be easily modified to have these attributes would be prioritized.

Once a suitable location for the new shelter is established, the Agency releases a Request for Information (RFI) to give the community an opportunity provide feedback on the new facility. The Agency then reviews this feedback and releases a Request for Proposals (RFP) detailing the expectations in terms of shelter type, onsite services, and other relevant operations.

Potential service providers respond to these RFPs with their proposed budget and other operational plans for the new facility. A team of reviewers from across the Agency scores each proposal. The Agency then reviews these scores and determines which provider will be given the contract to operate the facility.

Because co-sheltering is a new model not previously attempted by DHS, additional funding for technical assistance during and after the RFP stage would help ensure that shelters opening with this new model are best set up to succeed.

## **Preliminary Minimum Projected Budget Implications**

Though it is premature to project with any certainty the total annual budgetary impact of accommodation of pets in shelter, it is, nevertheless, important for DHS to stress that any responsible approach to accommodation of pets, one that attends to the welfare of both humans and animals, will increase the Agency's required expenditures.

As the pet-related questions asked of clients at intake were just implemented earlier this calendar year, it is not possible for the Agency to accurately estimate yet the projected need among clients for pet accommodation. We do know that nearly half of all New Yorkers are pet owners. Early responses to the pet-related questions suggest those presently requesting shelter services have a lower rate of pet ownership (but this might change if policy changes regarding the accommodation of pets in shelter). As such, it is fair to estimate that at the very least DHS should expect 10% of its clients to request pet accommodations, which equates to 2,500 pets at any given time based on the shelter census at present, with about 1,700 of those in the single adult system. To accomplish this, DHS would need to implement a considerable number of creative approaches, as outlined in this document, including reducing density in congregate units, taking units offline across the system to repurpose space for storage of pet supplies and pet cleaning and hygiene facilities, upgrading existing facilities, and opening new shelter sites to facilitate these necessary changes to existing shelter capacity. Without site specific upgrades identified, it is not possible at this point to estimate the cost of facility upgrades. However, based on the necessary approaches to pet accommodation covered in this document, we can safely say the accommodation of 2,500 pets systemwide would necessitate, at bare minimum, space equivalent to 850 additional single adult shelter beds, or the equivalent of at least five new shelters. The cost of this additional capacity, based on the single adult per diem rate of \$137.74 (as reflected in the Mayor's Management Report) will be at least \$42.7M more per year over the existing budget.

On top of this cost for additional shelter capacity, the Agency will also incur additional janitorial, maintenance, and supply costs via the shelter budgets. As mentioned in this document, pet-free facilities must be maintained for a host of reasons. If the Agency were to preserve half of the system as pet free while allowing pets in the other half (including the additional required capacity mentioned above), DHS should expect at least thirteen pets at a time at the co-sheltering locations run by DHS providers, with an estimated 10% increase in janitorial, maintenance, and supply costs at these provider operated shelter sites, or roughly \$5.5M more per year over the existing shelter budgets.

Though clients would be expected to pay for their own pet expenses, the financial reality of clients receiving DHS services would necessitate agency support, totaling an estimated \$1.3M annually via the shelter budgets.

Insurance implications must also be considered. The presence of multiple animals in one facility will undoubtedly impact premiums, though the increased cost is not known at this time. Even more, exclusions based on breed differ across insurance companies. If DHS providers are made to accept all breeds, the breed exclusions will expose provider agencies to risk that they may be unwilling to accept, potentially resulting in the loss of provider agencies.

## **Section 8: Domestic Violence Residential Programs**

Domestic Violence Services is mandated under the NYS Social Services Law and operates under the New York State Domestic Violence Prevention Act of 1987 to provide critical emergency services to domestic violence survivors in the form of temporary shelter and access to social services. DVS oversees the largest portfolio of temporary residential housing for domestic violence survivors in the nation through its contracts with not-for-profit organizations ensuring access to a safe living environment and offering trauma informed care and supportive services for survivors of domestic violence and their children in an emergency and transitional shelter setting and in the community.

Emergency domestic violence shelters are governed by the NYS Office of Children and Family Services (OCFS) regulations and issued an operating certificate by OCFS. Emergency shelter and supportive services are provided to survivors for an initial 90 days and extended up to an additional 90 days, for a maximum of 180 days in a safe environment so a stay at a Domestic Violence emergency shelter is time limited. Overall, the domestic violence shelter system consists of 56 domestic violence shelters currently operating in all five boroughs of New York City and are secured by contracts with 17 not-for-profit organizations. The emergency domestic violence shelter system consists of 44 confidential facilities with a total capacity of 2,395 emergency beds located in standalone shelters and dwellings located in residential homes and apartment buildings.

Additionally, there are 12 DV Tier II/transitional shelter facilities totaling 539 Tier II units. Shelter for Families with Children also referred to as "Tier II" shelter is governed by OTDA regulations and issued an operating certificate by OTDA. DV transitional shelters provide an extension of residential shelter services for families exiting the time limited emergency DV shelter system. Families requiring continued support and ongoing services can stay in transition shelter until they can transition to safe permanent housing and re-integrate into communities.

#### **Accommodation of Pets in DV Residential Shelters**

DVS takes a client centered approach to address the impact of domestic violence and recognizes the need for victims and their families to have the opportunity to bring their pets to emergency shelter and have their pets considered in their safety planning. Domestic Violence victims may fear that leaving their pets behind with their abuser will leave their pet vulnerable to injury or death and may impede victims from seeking immediate assistance and safety.

## Rules and Regulations applying to Pets in Shelter

Emergency domestic violence shelters are governed by OCFS regulations and issued an operating certificate by OCFS. OCFS Regulations Section 452.9 which denotes the General Operational Standards for Residential Programs for Victims of Domestic Violence states that service animals and therapy dogs must be allowed to accompany domestic violence victims to a residential program for victims of domestic violence, provided that the service animal does not impose an undue burden on the residential program for victims of domestic violence and must be under control of the domestic violence victim.

## OCFS Regulations Section 452.9. General operational standards, 18- NYCRR ADC 452.9

Service animals and therapy dogs must be allowed to accompany domestic violence victims to a residential program for victims of domestic provided that the service animal does not impose an undue burden on the residential program for victims of domestic violence. Service animals and therapy dogs must be under control of the domestic violence victim. Care and supervision of service animals and therapy dogs are the responsibility of the domestic violence victim, including toileting, feeding, grooming and veterinary care. (a) An undue burden may include situations where: (1) the service animal or therapy dog poses a direct threat to the health or safety of others, has a history of aggressive behavior, or is not under the control of the domestic violence victim. (2) accommodating the accompaniment of the service animal or therapy dog would create significant difficulty or expense to the residential program for victims of domestic violence, taking into consideration the overall size and budget of the residential program for victims of domestic violence. (b) If the residential program for victims of domestic violence determines that accompaniment by the service animal or therapy dog would constitute an undue burden on the residential program, the program must make reasonable efforts to facilitate placement of the service animal or therapy dog at an off-site animal care facility, or to find another suitable placement for the victim of domestic violence and their service animal or therapy dog. (ii) Therapy dogs shall be allowed within the residential program for victims of domestic violence for the purpose of providing therapeutic services. (iii) Residential programs for victims of domestic violence may have policies that permit residents to have emotional support / comfort animals and/or pets accompany residents. Link:

https://ocfs.ny.gov/programs/domestic-violence/assets/regulations/18-NYCRR-Part-452.pdf

#### **Existing Processes and Resources**

Domestic Violence victims in need of safe housing who want to bring their pet to emergency shelter are identified at intake. The Safe Horizon Hotline asks clients if they have a pet during their assessment and DVS Project NOVA staff collocated at DHS intake shelters are notified by DHS if a client applying at their intake centers or is housed in their shelters has a pet as a part of the referral.

The need for pet accommodation is entered into the intake notes section in the HRA Shelter Occupancy and Referral Tracking System (SORTS), the DVS data management system. There are future plans to establish a field in SORTS to annotate the need for pet placement when SORTS is rewritten.

DVS works with a network of providers to provide support services to survivors and their children. One such provider is Urban Resource Institute (URI) that in 2013, launched an innovative co-living program named PALS (People with Animals Living Safely) that welcomed pets into domestic violence shelters. PALS is a nationally recognized program and has since expanded to include 435 pet-friendly apartments across nine (9) different domestic violence shelters in four (4) boroughs, including PALS Place, opened in Brooklyn in 2018 as the first domestic violence shelter in the nation and the only co-living shelter in New York City in which

every apartment unit has been designed to shelter pets alongside their families in the same safe, secure space.

URI has also conducted presentations to other domestic violence providers on how to Integrate Pets into Domestic Violence Shelters to encourage pet placement at other emergency shelters.

DVS has discussed accommodating pets in emergency and transitional shelters with providers during best practice discussions and providers have acknowledged that accommodating pets is challenging in shared living spaces. DVS conducted a recent survey that was sent to providers to account for pets in shelter, but results are still pending.

Additional resources provided to domestic violence victims who seek placement of their pets when seeking emergency shelter include referrals to Red Rover, a Safe Escape grant program that offers survivors of domestic violence support by offsetting the cost of temporary boarding while a client is in a domestic violence shelter as well helping to locate existing programs that can house victims' pets; and referrals to NYC's Animal Care Centers (ACC) that has a community pets program that may be able to provide short-term care for pets of DV Survivors.