

## MEMO

Date: February 24, 2026

From: Arron Richardson  
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Director, Accessible Education & Resource Center

To: JSU Campus Community

**Re: Updated Emotional Support Animal (ESA) Policy**

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Jackson State University will implement an updated Emotional Support Animal (ESA) policy effective March 1, 2026. This update applies to all students requesting to have an Emotional Support Animal in university housing. The purpose of this policy is to ensure that ESA requests are reviewed carefully, consistently, and in compliance with federal housing regulations. Because ESAs are approved as disability-related housing accommodations, the university must verify both the disability-related need and the health and safety standards of the animal before approval can be granted. Students who plan to reside in campus housing and are requesting an ESA must complete the full ESA application process prior to bringing the animal into university housing.

To be considered for approval, the following documents must be submitted together as one complete application packet:

- A fully completed ESA application;
- Documentation from a licensed medical provider on official letterhead. The provider must answer all required questions included in the ESA documentation form to verify the disability-related need for the animal;
- A signed acknowledgment confirming that the student has reviewed and agrees to follow the Student ESA Handbook;
- Completed veterinarian documentation verifying vaccinations, health status, and compliance with animal care standards.

All required documentation must be submitted at the same time. Submitting partial documentation will delay the review process. Applications that do not include all required materials cannot be processed. This structured process is designed to protect the student requesting the accommodation, other residents within the housing community, and the institution. It ensures that ESA requests are evaluated fairly, that animals residing in campus housing meet appropriate health and safety standards, and that the university remains compliant with federal housing guidelines. Students and families are encouraged to carefully review the ESA policy and documentation requirements before submitting materials to avoid delays in housing approval. Questions regarding the ESA policy or application process should be directed to the Accessible Education and Resource Center. We appreciate your cooperation as we work to maintain a safe, inclusive, and compliant residential environment for our campus community.

## **Jackson State University**

### **Emotional Support Animal (ESA) Policy**

#### **Effective Date**

March 1, 2026

#### **1. Policy Statement and Scope**

Jackson State University (JSU) recognizes the importance of Emotional Support Animals (ESAs) as supported by the Fair Housing Act (FHA). Jackson State University is committed to allowing ESAs that are necessary to provide individuals with mental health disabilities equal opportunity to use and enjoy University housing. This policy explains the specific requirements applicable to an individual's use of an ESA in University housing. This policy applies solely to Emotional Support Animals that may be approved for university housing. This policy does not apply to Service Animals as defined by the Department of Justice under the Americans with Disabilities Act (ADA). Although animals are generally prohibited in university housing, Jackson State University will consider requests for reasonable accommodation to allow an ESA when the accommodation is reasonable and necessary because of a documented disability. No ESA may be kept in university housing at any time prior to the individual receiving written approval as a reasonable accommodation pursuant to this policy. If an unapproved animal is brought into university housing, the student will be required to remove the animal immediately and may be subject to disciplinary action. The Accessible Education and Resource Center (AERC) is the sole office responsible for determining whether a request for an ESA will be approved.

#### **2. Definition: Emotional Support Animal (ESA)**

An Emotional Support Animal (ESA) is an animal that provides therapeutic emotional support for an individual with a diagnosed mental or emotional disability that substantially limits one or more major life activities. Unlike Service Animals, which are trained to perform specific tasks related to an individual's disability, ESAs are not trained to perform disability-specific tasks. The therapeutic benefit of an ESA is derived from its presence and interaction with the individual rather than from trained work or tasks. An ESA is not a pet. While ESAs often resemble pets in form, their presence in university housing is permitted only as a reasonable accommodation under the Fair Housing Act (FHA) and only when the accommodation is determined to be necessary and reasonable. ESAs are typically animals commonly kept in households for companionship or pleasure. Examples may include dogs, cats, small birds, rabbits, hamsters, gerbils, fish, turtles, or other small domesticated animals traditionally kept in the home. Under guidance from the U.S. Department of Housing and Urban Development (HUD), animals that are not commonly kept in households such as barnyard animals, reptiles other than turtles,

monkeys, and other non-domesticated animals are generally not considered appropriate Emotional Support Animals.

### **ESA Owner / Handler**

The ESA owner, also referred to as the handler, is the student who has been approved for an Emotional Support Animal accommodation. The ESA owner is solely responsible for the care, supervision, control, and behavior of the animal at all times. Approval of an ESA does not permit delegation of responsibility to roommates, guests, or University personnel. The ESA owner is expected to comply with all University policies, Housing and Residence Life regulations, and local laws related to animal care and control. The ESA owner must ensure that the animal's presence does not disrupt University operations, residential environments, or the rights of others. Generally, approval is limited to one Emotional Support Animal per student. Approval of an ESA is animal-specific and does not automatically extend to replacement or additional animals. Exceptions may be considered on a case-by-case basis.

### **3. Scope and Housing Limitations**

Emotional Support Animals (ESAs) approved by Jackson State University are permitted only within university-owned or University-operated housing as a housing-related accommodation under the Fair Housing Act. Approval of an ESA does not grant access to any other University facilities, programs, or activities. ESAs are strictly prohibited from all non-residential campus locations, including but not limited to academic buildings, classrooms, laboratories, dining facilities, libraries, athletic facilities, offices, administrative areas, and campus events. Approval of an ESA does not guarantee a specific housing assignment or placement. Housing and Residence Life retains the authority to reassign the student approved for an ESA, roommates, or nearby residents when necessary to address health concerns, safety issues, space limitations, or accommodation-related conflicts. The ESA must be maintained within the student's assigned living space at all times. The animal may exit the residence hall only for waste relief or necessary exercise and must remain under the control of the approved student during such times. ESAs are permitted only in university-designated, approved green spaces for waste relief and exercise and are not permitted on the Gibbs-Green Plaza. ESAs may not be left unattended in common areas or other residential spaces. Any presence of an ESA outside the approved scope of this section constitutes a policy violation and may result in corrective action, removal of the animal, or revocation of the ESA accommodation.

### **4. Timing of Requests and Academic Deadlines**

For purposes of Emotional Support Animal (ESA) accommodation requests, Jackson State University applies the following classifications:

A **new student** is a scholar who has been newly admitted to Jackson State University and has not previously enrolled as a degree-seeking student. This includes first-time freshmen, transfer students, and newly admitted graduate or professional scholars.

A **returning student** is a scholar who was enrolled at Jackson State University during the immediately preceding academic year and is continuing enrollment for the upcoming academic year. This classification also includes scholars seeking renewal of a previously approved ESA accommodation. Jackson State University accepts ESA accommodation requests only during established application windows. These timelines allow sufficient time for review, housing coordination, and implementation.

For the **Summer Session**, registration begins March 1. ESA applications must be submitted by May 1 for returning students and by May 15 for new students.

For the **Fall Semester**, the ESA application opens March 1. Applications must be submitted by June 30 for returning students and by July 15 for new students.

For the **Spring Semester**, the ESA application opens October 1. Applications must be submitted by December 1 (for new student only).

***ESA applications submitted after the applicable deadline will be denied as untimely. Students retain the right to appeal a late-application denial in accordance with Section 7 of this policy. Nothing in this section is intended to prevent a student from submitting a request for an Emotional Support Animal accommodation outside of the established application windows when a disability-related need arises unexpectedly or due to a documented change in circumstances. In such cases, the Accessible Education and Resource Center will evaluate the request through an individualized, interactive process based on the information provided. Consideration of a late request does not guarantee approval. Determinations will be based on the reasonableness of the request, the timing of submission, housing availability, and the University's ability to implement the accommodation without undue administrative or operational burden. The University cannot guarantee that late requests will be reviewed or implemented prior to move-in or the start of the semester.***

***ESA approval is granted for one academic year only and does not automatically carry forward. Students seeking to continue an ESA accommodation must submit a new request each academic year in accordance with this policy.***

## **5. Possible Reasons an ESA Request May Be Denied or Revoked**

Jackson State University reserves the right to deny, conditionally approve, temporarily suspend, or permanently revoke approval of an Emotional Support Animal (ESA) accommodation when the accommodation is determined to be unreasonable, no longer necessary, or when the presence of the animal poses a risk to the health, safety, or residential experience of the campus community. Decisions are made on an individualized, case-by-case basis in accordance with applicable federal law, institutional policy, and operational considerations. The University is not required to approve or maintain an ESA accommodation that would impose an undue administrative or operational burden or fundamentally alter University housing operations.

Reasons an ESA request may be denied or revoked include, but are not limited to, the following:

- The space required for the animal's enclosure (crate, cage, tank, or kennel) is too large for the student's assigned housing space;
- Approval of the ESA would require the displacement of another student from university housing, including but not limited to situations involving documented allergies or medical conditions;
- The animal interferes with the rights of others to peaceful enjoyment of the residential environment, including excessive noise or odor;
- The animal is not housebroken or is unable to live reasonably in a communal living environment;
- The animal poses a health risk due to zoonotic diseases or safety concerns related to containment that cannot be sufficiently mitigated;
- The animal's required vaccinations are not current or cannot be verified;
- The animal poses or has posed a direct threat to the health or safety of others, including aggressive behavior or injuring another person or animal; a single bite incident may result in removal;
- The animal has caused or is likely to cause excessive damage to university property beyond normal wear and tear;
- The animal is not being properly cared for or treated humanely;
- The documentation provided is incomplete, inconsistent, insufficient, or no longer valid;
- The animal is too young to be successfully integrated into a communal housing setting that includes noise, activity, and periods of confinement;
- The animal's behavior is unruly, disruptive, or out of control and the student does not take immediate and effective corrective action;
- The animal is in ill health or is habitually unclean; or
- The presence of the animal would result in an undue administrative or operational burden or fundamentally alter University housing operations.

## **6. Denial of Accommodation and Interactive Process**

Jackson State University evaluates all Emotional Support Animal (ESA) requests through an individualized, interactive process in accordance with the Fair Housing Act and applicable federal guidance. Submission of a request does not guarantee approval. The University retains discretion to deny an ESA accommodation when the request is not reasonable, not necessary, or cannot be implemented without undue administrative or operational burden.

### **Denial of Accommodation**

A request for an ESA accommodation may be denied, in whole or in part, when one or more of the following applies:

- The documentation does not establish that the student has a disability that substantially limits one or more major life activities;
- The documentation does not demonstrate a disability-related need for an ESA in University housing;
- The requested ESA is not necessary to afford the student equal opportunity to use and enjoy University housing;
- The specific animal requested cannot be reasonably accommodated in the assigned housing environment;
- The request would result in a fundamental alteration of university housing operations;
- The request would impose an undue administrative or operational burden on the University; or
- The documentation is incomplete, inconsistent, outdated, or otherwise insufficient despite an opportunity to supplement.

The University may approve the accommodation but deny the specific animal identified, or may impose reasonable conditions or limitations when appropriate.

### **Interactive Process**

When an ESA request is denied or when the specific animal cannot be approved, the Accessible Education and Resource Center (AERC) may engage the student in an interactive process to determine whether alternative accommodations may be available that would effectively address the student's disability-related needs. Participation in the interactive process is a shared responsibility. The interactive process may include requests for clarification, additional documentation, or discussion of alternative accommodations. The University is not required to provide an alternative accommodation if no reasonable alternative exists or if the student declines to participate in the interactive process.

### **Written Notice**

All denial decisions will be communicated to the student in writing and will include the basis for the decision and information regarding the right to appeal. The appeal process is outlined in Section 7 of this policy.

## **7. Late Applications, Denial, and Appeal Procedure**

Students have the right to appeal a denial, conditional approval, revocation, or late-application denial of an Emotional Support Animal (ESA) accommodation. This grievance and appeal process is intended to ensure fair, consistent, and documented review of ESA-related decisions.

### **Late Applications**

ESA applications submitted after the published deadlines outlined in Section 4 are subject to automatic denial. Late applications may be considered through the grievance process only when the student demonstrates extraordinary or extenuating circumstances related to a disability-related need that could not have been reasonably anticipated.

### **Right to File a Grievance / Appeal**

A student who disagrees with an ESA determination may file an appeal. Appeals must be based on substantive grounds, including but not limited to:

- New or additional information not previously available or considered;
- Alleged procedural error in the review of the request; or
- Extraordinary circumstances directly related to the accommodation request.

### **Appeal Submission Requirements**

To initiate the appeal process, the student must complete the official University appeal form, which can be accessed at the following link:

<https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:92bbdfdo-5ee6-4eb9-b8f6-dd276b711a99>

The completed appeal form must be accompanied by supporting documentation relevant to the basis of the grievance or appeal. Supporting documentation may include updated medical or mental health provider documentation, clarification of previously submitted information, or materials addressing the stated reason for denial. Appeals submitted without supporting documentation will be deemed incomplete and may be denied without further review.

### **Appeal Review and Final Determination**

Appeals are reviewed by the designated University authority independent of the original ESA determination. Review is limited to the appeal submission, supporting documentation, and the record available at the time of the original decision. The University will issue a written decision following review of the appeal. The appeal decision is final and concludes the University's internal review process.

### **Denial of Accommodation and Interactive Process**

If the Accessible Education and Resource Center determines that a request for an ESA should not be approved, the student will be notified in writing within seven (7) business days. When appropriate, the AERC may offer to engage in the interactive process to determine whether alternative accommodations may be available.

## **8. Required Documentation**

Submission of a complete and accurate documentation packet is a mandatory condition of consideration for an Emotional Support Animal (ESA) accommodation. The University will not review, approve, or provisionally approve any ESA request that does not include all required documentation outlined in this section. Incomplete submissions will be denied without further review. All documentation must be current, legible, and submitted by the published deadlines unless otherwise permitted. The following information must be provided:

### **A. Medical / Mental Health Provider Verification (Required)**

Medical or mental health documentation must be completed by a licensed provider who has an ongoing therapeutic relationship with the student. Documentation must be submitted on professional letterhead and must explicitly and individually address each question below. General statements, conclusory opinions, or failure to respond to all questions will result in denial due to insufficient documentation. **Documentation from online, commercial, or**

**telehealth-only ESA certification services that do not establish an ongoing therapeutic relationship will not be accepted.**

**Provider Credentials**

1. Provider's full name, professional title, license type, license number, and state of licensure;
2. Provider's business address, telephone number, and professional email address;
3. Confirmation that the provider is not a family member of the student; and
4. Length of time the provider has maintained an ongoing therapeutic relationship with the student.

**Information About the Student's Disability**

5. Does the student have a mental or emotional impairment that substantially limits one or more major life activities? Describe the substantial limitation in detail.
6. Date treatment began for the identified condition.
7. Dates and frequency of treatment over the past six (6) months.
8. Method of service delivery (in person, telehealth, or both).
9. Whether the student requires ongoing treatment and an explanation.

**Nexus Between Disability and ESA**

10. Describe how the student's disability impacts the student's ability to use and enjoy University housing.
11. Explain why the presence of an Emotional Support Animal is necessary to afford the student equal opportunity to use and enjoy University housing.
12. Identify the specific symptoms or functional limitations mitigated by the presence of the ESA.
13. Explain how the presence of the ESA alleviates or reduces those symptoms.
14. Has the ESA been effective for this student in the past or is it currently effective?
15. Is the requested ESA a specific component of the student's treatment plan, or a supportive measure believed to be beneficial in the residential environment? Explain.
16. Describe the anticipated consequences, in terms of disability symptomology, if the ESA accommodation is not approved.

**Student Readiness and Responsibility**

17. Have you discussed with the student the responsibilities associated with caring for an animal while residing in university housing?
18. In your professional opinion, could the responsibilities of caring for an animal exacerbate the student's condition? Explain.

## **B. Veterinary Health Certification (Required)**

Veterinary documentation must be submitted for the specific animal proposed as an ESA and must include:

1. Certification of health completed within sixty (60) days of submission;
2. Confirmation of current vaccinations as required by species;
3. Description of pest prevention and treatment;
4. Confirmation that the animal is free from communicable or zoonotic diseases; and
5. Age verification confirming the animal is sufficiently mature to be housebroken and behaviorally stable.

**Jackson State University reserves the right to deny approval for animals that are too young, in ill health, or not suitable for a communal living environment.**

## **C. Additional Required Materials**

Students must also complete the Emotional Support Animal (ESA) Handbook located in Canvas. Completion of the ESA Handbook is mandatory and serves as confirmation that the student understands University expectations, responsibilities, and enforcement procedures related to ESAs in University housing.

### **In addition, students must submit:**

- Student Agreement to ESA Policy;
- Emergency contact and boarding plan for the animal;
- Written consent permitting limited disclosure to Housing, Residence Life, and impacted roommates; and
- Recent photograph of the animal.

Failure to complete the ESA Handbook or submit any required material will result in the application being deemed incomplete.

## **9. Student Responsibilities After Approval**

Approval of an Emotional Support Animal (ESA) accommodation is contingent upon the student's ongoing compliance with all responsibilities outlined in this policy. Approval does not transfer ownership, care, supervision, or liability for the animal to Jackson State University. The student approved for an ESA assumes full responsibility for the animal at all times and must ensure that the animal's presence does not disrupt University operations, housing environments, or the rights of others. Failure to adhere to these responsibilities may result in corrective action, temporary suspension, or revocation of the ESA accommodation, and may also constitute a violation of Housing and Residence Life policies or the Student Code of Conduct.

Students approved for an ESA are solely responsible for:

- Care, supervision, and control of the animal at all times;
- Maintaining appropriate enclosure when the animal is unattended;
- Proper waste disposal in designated outdoor dumpsters only;

- Maintaining hygiene and odor control;
- Ensuring vaccinations and veterinary records remain current;
- Payment for any damage, cleaning, pest treatment, or repairs caused by the animal; and
- Removing the ESA from campus when the student is away overnight.

Students must understand that approval is granted for a specific animal. Any change, replacement, or addition of an animal requires submission of a new ESA request and full documentation review prior to the animal entering University housing.

## **10. Removal of ESA and Housing Obligations**

Jackson State University reserves the right to temporarily or permanently remove an Emotional Support Animal (ESA) from university housing if the animal poses an immediate threat to the health or safety of the community, is in distress, or during emergency situations involving Housing staff, Campus Safety, or law enforcement. If an ESA must be permanently removed, removal must occur within seventy-two (72) hours of notification. Removal of an ESA does not relieve the student of housing contract obligations. Removal of an ESA may negatively impact the student's eligibility for future ESA accommodation requests. Prior removals, policy violations, or failure to comply with ESA-related responsibilities may be considered in the review of any subsequent ESA applications. Violations of this policy may also constitute violations of Housing and Residence Life policies or the Student Code of Conduct. The Accessible Education and Resource Center determines accommodation status; disciplinary matters are addressed through the appropriate University process. Violations of this policy may also constitute violations of Housing and Residence Life policies or the Student Code of Conduct. The Accessible Education and Resource Center determines accommodation status; disciplinary matters are addressed through the appropriate University process.

## **11. Non-Retaliation**

Jackson State University strictly prohibits retaliation against any individual for requesting, using, participating in, or assisting another individual with an Emotional Support Animal (ESA) accommodation process. Retaliation is prohibited regardless of whether the accommodation request is approved, denied, conditionally approved, or revoked.

Prohibited retaliation includes, but is not limited to:

- Intimidation, coercion, threats, or harassment;
- Interference with housing assignments, academic participation, or access to university services;
- Adverse treatment by Housing staff, faculty, staff, or students because an individual requested or received an ESA accommodation; or
- Disciplinary or adverse actions taken in response to filing an ESA request, grievance, or appeal.

Individuals who believe they have experienced retaliation related to an ESA request or accommodation should report the concern through the University's established grievance

reporting channels. Allegations of retaliation will be reviewed independently of the underlying ESA request and addressed in accordance with applicable University policies and procedures. Engaging in retaliation may result in disciplinary action, up to and including termination of employment or student discipline, consistent with university policy.

## **12. Policy Review and Amendments**

Jackson State University reserves the right to review, modify, interpret, or amend this Emotional Support Animal (ESA) Policy as necessary to ensure continued compliance with federal and state law, regulatory guidance, and institutional needs. The University may update this policy in response to changes in law, guidance issued by the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Justice, or other regulatory agencies, operational considerations, or emerging best practices in higher education. This policy is subject to periodic review by the Accessible Education and Resource Center (AERC), Housing and Residence Life, and other appropriate University offices. Revisions may be made with or without prior notice; however, reasonable efforts will be made to communicate substantive changes which may affect students and campus stakeholders. Nothing in this policy is intended to create a contractual obligation between the University and any student. The University retains discretion to interpret and apply this policy on a case-by-case basis consistent with applicable law. The most current version of this policy supersedes all prior versions, guidance documents, and informal communications related to Emotional Support Animals in University housing.

## **13. Contact Information**

Accessible Education and Resource Center  
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601.979.3704  
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