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Pregnancy, Parenting and Relations Conditions Nondiscrimination Policy - Interim

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Policy Timeline

Initial Effective Date: 8/1/2024

Frequency of Review:

- ☐ Semiannually (twice per year)
☒ Annually
☐ Biennially (every two years)
☐ Other: _____

Date(s) Revised:

Policy Overview

University of Health Sciences and Pharmacy in St. Louis (UHSP) does not discriminate in its education programs or activities against any applicant for admission (prospective student), current student, applicant for employment, or employee on the basis of current, potential, or past pregnancy or related conditions as mandated by Title IX of the Education Amendments of 1972 (Title IX). UHSP prohibits members of the University community from adopting or implementing any policy, practice, or procedure which treats an applicant for admission, student, applicant for employment, or employee differently on the basis of current, potential, or past parental, family, or marital status.

Applies to:

Current and Prospective Students or Employees

Definitions:

<u>Term</u>	<u>Definition</u>
<i>Familial Status</i>	The configuration of one's family or one's role in a family
<i>Marital Status</i>	The state of being married or unmarried.
<i>Parental Status</i>	The status of a person who, with respect to another person who is under the age of 18, is a biological, adoptive, foster, or stepparent; a legal custodian or guardian; in loco parentis with

	respect to such a person; or actively seeking legal custody, guardianship, visitation, or adoption of such a person.
<i>Pregnancy and Related Conditions</i>	The full spectrum of processes and events connected with pregnancy, including pregnancy, childbirth, termination of pregnancy, or lactation; related medical conditions; and recovery therefrom.
<i>Reasonable Modifications</i>	Individualized modifications to UHSP 's policies, practices, or procedures that do not fundamentally alter the Recipient's education program or activity.

Policy Details

1. Non-Discrimination Statement

UHSP does not discriminate in its education program or activity against any applicant for admission, student, applicant for employment, or employee on the basis of current, potential, or past pregnancy or related conditions as mandated by Title IX of the Education Amendments of 1972 (Title IX). UHSP prohibits members of the community from adopting or implementing any policy, practice, or procedure which treats an applicant for admission, student, applicant for employment, or employee differently on the basis of current, potential, or past parental, family, or marital status.

2. Information Sharing Requirements

Any University employee who becomes aware of a student's pregnancy or related condition is required to:

- a. Provide the student with the Title IX Deputy Coordinator's contact information and communicate that the Title IX Deputy Coordinator can help take specific actions to prevent discrimination and ensure equal access to the University's education program and activity.
- b. Notify the Title IX Deputy Coordinator with information regarding the student. Upon notification of a student's pregnancy or related condition, the Title IX Coordinator, Title IX Deputy Coordinator, or delegate will contact the student and inform the student of the University's obligations to:
 - Prohibit sex discrimination.
 - Provide reasonable modifications.

- Allow access, on a voluntary basis, to alternative course content delivery methods, when possible.
- Allow a voluntary leave of absence.
- Ensure lactation space availability.
- Maintain a Resolution Process for alleged discrimination.
- Treat pregnancy as comparable to other temporary medical conditions for medical benefit, service, plan, or policy purposes.

The Title IX Deputy Coordinator will also notify the student of the process to file a complaint for alleged discrimination, harassment, or retaliation, as applicable.

3. Reasonable Modifications for Students

Students who are pregnant or are experiencing related conditions are entitled to “Reasonable Modifications” to prevent sex discrimination and ensure equal access to the University’s education programs and activities. Any student seeking these modifications must contact the Title IX Deputy Coordinator for Students to discuss appropriate and available modifications based on their individual needs. Not all modifications are appropriate for all contexts. Students are encouraged to request modifications as promptly as possible. Reasonable Modifications are voluntary, and a student can accept or decline modifications approved by the University.

Examples of Reasonable Modifications include:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom
- Intermittent absences to attend medical appointments
- Access to online or homebound education for non-labs. Modification of a lab experience may be possible and may include an alternative lab completion schedule.
- Changes in course schedule
- Prerequisite course flexibility, when possible
- Time extensions for coursework and rescheduling of tests and examinations
- Allowing a student to sit or stand, or carry or keep water nearby
- Counseling
- Changes in physical space or supplies (for example, access to a larger desk or a footrest)

- Elevator access
- A larger uniform or other required clothing or equipment
- Other changes to policies, practices, or procedures determined by the Title IX Deputy Coordinator, with possible consultation from other University officials or another resource.

In situations such as clinical rotations, performances, labs, and group work, the institution will work with the student to devise an alternative path to completion, if possible. In progressive curricular and/or cohort-model programs, medically necessary leaves may be sufficient cause to permit the student to shift course order, substitute similar courses, or join a subsequent cohort when returning from leave. Students are encouraged to work with their faculty members and the University's support systems to devise a plan for how to best address the conditions as pregnancy progresses, anticipate the need for leaves, minimize the academic impact of their absence, and get back on track as efficiently and comfortably as possible. The Title IX Deputy Coordinator will assist with plan development and implementation as needed.

When it is unclear which potential Reasonable Modifications should be considered to ensure equal access, supporting documentation may be required.

Information about pregnant students' requests for modifications will be shared with faculty and staff only to the extent necessary to provide the Reasonable Modification.

Students experiencing pregnancy-related conditions that manifest as a temporary disability under the Americans with Disabilities Act (ADA) or Section 504 of the Rehabilitation Act are eligible for reasonable accommodations just like any other student with a temporary disability. The Title IX Deputy Coordinator will consult with Assistant Director, Access Services to ensure the student receives reasonable accommodations for their disability as required by law.

4. Certification to Participate

All students should be informed of health and safety risks related to participation in academic and co-curricular activities, regardless of pregnancy status. A student may not be required to provide health care provider or other certification that the student is physically able to participate in the program or activity, unless:

- a. The certified level of physical ability or health is necessary for participation;
- b. The institution requires such certification of all students participating; and
- c. The information obtained is not used as a basis for pregnancy-related discrimination.

5. Lactation Space Access

UHSP provides students and employees with access to on-campus lactation spaces that are functional, appropriate, and safe. Such spaces should be regularly cleaned, shielded from view, and free from the intrusion of others. For students participating in off-campus rotation sites, UHSP will provide support as needed to identify appropriate lactation space.

On-campus lactation spaces are in the following locations:

Building	Room
Academic and Research Building (ARB)	ARB 460
Jones Hall	Jones 1246
Recreation and Student Center (RAS)	RAS 445 (inside Counseling Center)

Spaces may be booked using the [online booking tool](#), which can also be accessed through the UHSP Apps page. After a booking is submitted a door code will be emailed to the requester.

6. Leaves of Absence

a. Students

Students are permitted to take a voluntary leave of absence for a reasonable time as deemed medically necessary by their health care provider because of pregnancy and/or the birth, adoption, or placement of a child. The leave term may be extended in the case of extenuating circumstances or medical necessity.

To the extent possible, UHSP will take reasonable steps to ensure that students who take a leave of absence or medical leave return to the same position of academic progress that they were in when they took leave, including access to the same or an equivalent course catalog that was in place when the leave began.

Students on a leave of absence do not qualify for housing since they are inactive students. Students with short-term absences considered reasonable modifications may continue to reside in housing.

Continuation of students' scholarship, fellowship, or similar UHSP-sponsored funding during the leave term will depend on the students' registration status and the policies of the funding program regarding registration status. Students will not be negatively impacted by or forfeit their future eligibility for their scholarship, fellowship, or similar UHSP-supported funding by exercising their rights under this policy.

The Financial Aid Office will advocate for students with respect to financial aid agencies and external scholarship providers if a leave of absence places eligibility into question.

To initiate a leave of absence, the student must contact the Title IX Deputy Coordinator at least 30 calendar days prior to the initiation of leave, or as soon as practicable. The Title IX Deputy Coordinator will forward this request on to the applicable Dean's office, who will coordinate with the Registrar and assist the student in completing any necessary paperwork.

b. Employees

Employees may be eligible for a leave of absence covered by the Family and Medical Leave Act policies maintained by the University and other leave options outlined in handbooks and policies.

If an employee, including a student-employee, is not eligible for leave under the aforementioned leave policy because they either (1) do not have enough leave time available under that policy, or (2) have not been employed long enough to qualify for leave under that policy, they are eligible to qualify for pregnancy or related condition leave under Title IX. Pregnancy and related conditions will be regarded as a justification for a leave of absence without pay for a reasonable period.

Employees who take leave under Title IX must be reinstated to the status held when leave began or a comparable position without a negative effect on any employment privilege or right.

7. Recipient Housing

A pregnant student's Recipient housing status will not be altered based on pregnancy status unless requested by the student. Parenting students' access to housing is governed by a student's housing agreement, Residential Life Handbook, and Student Code.

8. Policy Dissemination and Training

A copy of this policy will be made available to faculty and employees in annually required training and posted in the UHSP Policy Library. The University will educate all new students about this policy and the location of this policy as part of orientation. The Title IX Office will make educational materials available to all members of the University community to promote compliance with this policy and familiarity with its procedures.

BASED ON THE ATIXA PREGNANCY AND RELATED CONDITIONS MODEL POLICY.

Responsibilities	
Position/Office/Department	Responsibility
Faculty or Staff Employees	<ul style="list-style-type: none">• Explain the policy to any student who you know to be pregnant.• Share that student's information with the Title IX Deputy Coordinator for Students.• Work with Title IX Deputy Coordinator in cases where academic or other modifications are requested by students.
Human Resources	<ul style="list-style-type: none">• Receive employee requests for pregnancy leave and accommodations. Approve/deny accommodations and leave requests.
Title IX Coordinator/Deputies	<ul style="list-style-type: none">• Work with students, faculty and others on reasonable modifications for covered students.• Communicate leave of absence requests covered by the policy to the appropriate Dean's office.

Dean's Office	<ul style="list-style-type: none"> • Consult on potential course or degree plan changes or effects of leave of absences. • Approve and coordinate student leave of absence requests covered by the policy. • Consult on issues related to Reasonable Modifications with Title IX office
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Resources (required for any resource referred to in the policy)

[Disability Support Program Handbook](#)

Policy Contacts

<u>Name</u>	<u>Contact Information</u>
Daniel Bauer	<i>Title IX Coordinator</i> Assistant Vice President, Human Resources South Residence Hall, Room 1240C Daniel.Bauer@uhsp.edu 314-446-8308
Rebecca Jones	<i>Title IX Deputy Coordinator for Students</i> Assistant Vice President, Student Success and Wellness Recreation and Student Center (RAS), Room 410 Rebecca.Jones@uhsp.edu Rebecca.Jones@uhsp.edu 314-446-8352
Erica Whitted	<i>Title IX Deputy Coordinator for Employees</i> Associate Director, Human Resources South Residence Hall, Room 1240A Erica.Whitted@uhsp.edu Erica.Whitted@uhsp.edu 314-446-8315

POLICY APPROVALS

POC: ☐ Approved as to Form ☐ Not Approved

POC Chair Signature:

Date:

Policy Sponsor: ☒ Approved ☐ Not Approved

Signature: 
Daniel Bauer (Jul 19, 2024 12:55 CDT)

Date: Jul 19, 2024

President: ☒ Approved ☐ Not Approved

Signature: 
Brian Seiz (Jul 23, 2024 11:05 CDT)

Date: Jul 23, 2024

Board of Trustees: ☐ Approved ☐ Not Approved ☒ Not Applicable

Chair Signature:

Date: