

PREGNANT AND PARENTING STUDENTS

1. POLICY STATEMENT

Nazareth University is committed to creating and maintaining a community where all individuals enjoy freedom from discrimination, including discrimination on the basis of sex as required by Title IX of the Education Amendments of 1972 (Title IX). Title IX prohibits sex discrimination, which can include discrimination based on pregnancy, marital status or parental status, in educational programs and activities that are eligible for federal funding.

Nazareth University does not discriminate against any student on the basis of pregnancy or related conditions, childbirth or parental status.

2. PURPOSE OF THIS POLICY

This policy and associated procedures have been created to ensure the protection and non-discriminatory treatment of pregnant students, students with pregnancy-related conditions, and students who are parents.

3. SCOPE OF THIS POLICY

This policy applies to all students in connection with all aspects of Nazareth University's programs, including, but not limited to, admissions, educational programs and activities, extracurricular activities, hiring, employment, health insurance, and leave policies.

This policy is distinct from University policies applicable to students with disabilities. For more information regarding reasonable accommodations granted by the Academic Success & Accessibility Office, please see the Office [website](#).

4. DISCRIMINATION, HARASSMENT, AND RETALIATION

a. Discrimination and harassment of any member of Nazareth University community based on pregnancy, childbirth, and parental status is prohibited by this policy.

b. Nazareth University and its faculty, staff, and other employees will not discriminate against students on the basis of parental status, pregnancy, childbirth, termination of pregnancy or recovery therefrom.

c. Faculty, staff, and other Nazareth University employees are prohibited from interfering with students' right to take leave, seek modifications or otherwise exercise their rights under this policy.

d. Faculty, staff, and other Nazareth University employees are prohibited from retaliating against students for exercising the rights under this this policy, including imposing or threatening to impose negative educational outcomes because students request leave or modifications, file a complaint or otherwise exercise their rights under this policy.

5. WHOM TO CONTACT WITH QUESTIONS, CONCERNS OR COMPLAINTS

Nazareth University's Title IX Coordinator oversees compliance with this policy. The name and contact information for the Title IX Coordinator can be found on the University's Title IX [website](#).

For questions or concerns about this policy, please contact the Title IX Coordinator via email at titleix@naz.edu.

Complaints made under this policy should be directed to the Title IX Coordinator and may be made using the [online reporting form](#). All complaints brought under this policy will promptly be reviewed by the Title IX Office. While the steps may vary from case to case, the complaint resolution process will typically include a review of the complaint, consideration of any necessary interim actions, and an investigation of the complained of conduct, which may include interviews of individuals with knowledge and a review of documentation. At the end of the process, the Title IX Office will notify the complainant of the determination and implement any corrective actions.

Inquiries about the application of Title IX and its regulations may be referred to:
Assistant Secretary for Civil Rights
U.S. Department of Education, Office for Civil Rights
ocr@ed.gov
1-800-421-3481

6. DEFINITIONS

a. *Modifications*: Changes in the environment or typical operations of the University that enable pregnant students, students with pregnancy-related conditions or parenting students to continue to pursue their education.

- i. Note that modifications under this policy are not the same as reasonable accommodations that may be granted by the Academic Success & Accessibility Office. The phrase "reasonable accommodation" is used to refer generally to academic adjustments (which may include auxiliary aids and services), as well as modifications to academic requirements deemed necessary to ensure equal educational opportunity for students with disabilities under Section 504 of the of the *Rehabilitation Act of 1973* (Section 504), which prohibits discrimination on the basis of disability. This process is carried out by the Academic Success & Accessibility Office. For more information regarding reasonable accommodations granted by the Academic Success & Accessibility please see the Office [website](#).

b. *Parenting Students*: Students entitled to modified academic responsibilities under Section 8(c) below.

c. *Pregnancy or Pregnancy-Related Condition*: includes (but is not limited to) pregnancy, childbirth, false pregnancy, termination of pregnancy, conditions arising in connection with pregnancy, and recovery from any of these conditions.

c. *Pregnant Student*: refers to the student who is or was pregnant. This policy and its pregnancy-related protections apply to all pregnant persons, regardless of gender identity or expression.

7. DISCLOSURE IS VOLUNTARY

Disclosure of pregnancy, childbirth or a related condition is voluntary, but disclosure is necessary to seek modifications under this policy. Students who wish to voluntarily disclose a pregnancy or related condition are encouraged to contact the Title IX Office, which can assist with the development of an appropriate plan for continuation of the student's education.

8. ENTITLEMENTS AND PROCESSES

a. Pregnancy or Pregnancy-Related Condition: Participation in Classes and Extracurricular Activities

- i. Students have the right to continue participating in classes and extracurricular activities during pregnancy or a related condition. Pregnant students cannot be required to participate in an alternative program against their wishes.
- ii. The Title IX Coordinator will work with the student and, as appropriate, faculty and staff members, to devise a plan for how to best address the student's needs during pregnancy, childbirth or any related condition, including anticipating the need for leave and minimizing the impact of any related absences.
- iii. Students affected by pregnancy, childbirth or related conditions will be provided the same benefits and services as those provided to students with temporary medical conditions.

b. Pregnancy or Pregnancy-Related Condition: Modifications

- i. Students may request modifications due to pregnancy or a pregnancy-related condition.
- ii. It is the student's responsibility to affirmatively seek any necessary modifications. Students should contact the Title IX Office to request a modification related to pregnancy or a pregnancy-related condition.
- iii. A request for a modification can be made at any time. Note, though, that Nazareth University may be limited in its ability to implement modifications retroactively.
- iv. Information about pregnant students' requests for modifications will be shared with faculty and staff only to the extent necessary to provide an approved modification. Faculty and staff will regard all information associated with such requests as private and will not disclose this information unless necessary. Administrative responsibility for these modifications lies with the Title IX Coordinator, who will maintain all appropriate documentation related to modifications.
- v. Following a student's request for an modification, the Title IX Coordinator will provide the student with information about the next steps in the modification process, including whether the student is required to submit medical documentation identifying the condition and providing information to support the student's need for the requested modification(s). Where appropriate, the Title IX Coordinator will work with the Academic Success & Accessibility Office to review modification requests and any provided medical documentation. When required, any medical documentation that is provided will remain in a private student file in the Academic Success & Accessibility Office.
- vi. Modifications provided may include, but are not limited to:

1. Modifications requested by a pregnant student to protect the health and safety of the student and/or the pregnancy (such as allowing the student to maintain a safe distance from hazardous substances);
2. Making modifications to the physical environment (such as accessible seating);
3. Providing mobility support;
4. Extending deadlines and/or allowing the student to make up tests or assignments missed for pregnancy-related absences;
5. Offering remote learning options;
6. Excusing medically-necessary absences due to pregnancy or childbirth (irrespective of classroom attendance requirements set by a faculty member, department or division);
7. Granting leave due to pregnancy or childbirth for as long as is deemed medically necessary by the student's medical provider;
8. Granting leave per Nazareth's Leave of Absence Policy;
9. Awarding incomplete grades for classes that will be resumed at a future date; or
10. Allowing breastfeeding students reasonable time and space to pump breast milk in a location that is private, clean, and reasonably accessible. Note: Bathroom stalls do not satisfy this requirement.

vii. Students returning from a medically-necessary leave of absence due to pregnancy or childbirth will be reinstated to their academic program and extracurricular activities in the same status as when the leave began.

viii. In connection with clinical rotations, field experiences, performances, labs, and group work and similar requirements, Nazareth University will work with the student to devise an alternative path to complete or substitute the requirement, if possible. In progressive curricular and/or cohort-model programs, medically-necessary leaves under this policy are almost always sufficient cause to permit the student to shift course order, substitute similar courses or join a subsequent cohort when returning from leave.

c. *Parenting Students: Modified Academic Responsibilities*

i. Students who wish to remain engaged in their coursework following the birth or adoption of a child or placement of a foster child may request a period of academic modification during the first two months following the birth, adoption or placement of the child. An extension of this two-month period may be requested due to extraordinary parenting responsibilities. This period of academic modification can be requested by any student regardless of whether or not the student took a leave of absence for pregnancy or childbirth. At all times, the University reserves the right to require documentation to support a student's request for a period of academic modification.

ii. Students seeking a period of modified academic responsibilities should consult with the Title IX Office, which will coordinate with the academic department(s) and, if necessary, other relevant campus offices, to determine what appropriate academic modifications, if any, will be provided. If applicable, the Title IX Office will communicate to the student's academic advisor(s) any necessary information related to the modified academic responsibilities.

iii. If a requested period of academic modification is granted, the student's academic requirements may be adjusted and deadlines may be postponed as determined by the University.

iv. In timed degree, certification or credentialing programs, students who seek a period of academic modification due to the birth, adoption or placement of their child may be allowed an extension to prepare for and take preliminary and qualifying examinations, and an extension toward normative time to degree while in candidacy, to the extent those deadlines are controlled by Nazareth University.

d. Leaves of Absence

i. In connection with leaves of absence that may be granted as an modification under this policy (listed above in 8(b)(vi)(7)), students must contact the Title ix Coordinator. See section 8(b) above.

ii. In addition to the leave of absence that may be granted as an modification under this policy (listed above in 8(b)(vi)(7)), students may be granted a leave of absence under the terms of the University's broader leave of absence process, which allows for students to take a leave of absence for medical reasons, financial necessity or other extenuating circumstances.

e. Student-Employee Leaves of Absence

i. Pregnancy and related conditions will be treated as any other temporary disability for student employment purposes, including leave and benefits.

ii. Faculty or staff members who are also students should see the Faculty Manual or Staff Employee Handbook for employment policies related to pregnancy, childbirth, and parental status.

9. LEAVES AND FINANCIAL AID

Nazareth University's standard financial aid policies apply if a student takes a leave of absence due to pregnancy or parenting. The Withdrawal and Leave of Absence Policy is available on the Nazareth University Financial Aid website, under Financial Aid Policies. Before withdrawing or taking a leave of absence, students should review the Leave of Absence or Withdrawal information sheet at Financial Aid Forms page to understand how their financial aid may be impacted and to learn their rights and responsibilities. Upon returning from a leave of absence, the student's continuation of Nazareth University scholarships, NYS aid, and federal aid will be determined based upon their enrollment status (full-time or part-time) and their Satisfactory Academic Progress (sometimes referred to as SAP).

Please note: *Federal guidelines limit how long a student can remain in loan deferral without enrollment; students should check with their lenders for information on their specific situation.*

10. ACADEMIC PROGRESS

Students will not be required to take a leave of absence or withdraw from or limit their studies as the result of pregnancy, childbirth or related conditions. However, all students, including those who are pregnant and parenting, are expected to maintain satisfactory academic progress.

11. ESSENTIAL ELEMENTS OF ACADEMIC PROGRAMS

Nothing in this policy requires modification of the essential elements of any academic program.

12. HOUSING-RELATED MODIFICATIONS

Students' on-campus housing status will not be altered based on pregnancy unless requested by the student. Parenting students' access to housing is governed by the Residential Housing Policy and Contract. For additional information relating to housing modifications, students should contact Residential Life at reslife@naz.edu.

13. DISSEMINATION OF THE POLICY AND TRAINING

A copy of this policy will be made available to students, faculty, staff, and employees in annually required training and posted on the Nazareth University website and to students who disclose to the University that they are pregnant. In addition, as part of orientation, Nazareth University will also alert all new students about this policy and the location of this policy. The Title IX Office will make educational materials available to all members of the Nazareth University community to promote compliance with this policy and familiarity with its procedures.