



UNIVERSITY OF SAINT JOSEPH
CONNECTICUT

PREGNANCY AND PARENTING POLICY

THIS DOCUMENT PROVIDES CAMPUS GUIDANCE FOR SUPPORTING THE
SUCCESS OF PREGNANT AND PARENTING STUDENTS.

This policy has been
developed pursuant to
34 C.F.R. 106.4, U.S.
Dept. of Education



PREGNANCY & PARENTING ACCOMMODATIONS POLICY

OVERVIEW

The University of Saint Joseph is committed to maintaining a safe and non-discriminatory learning, living, and working environment for all members of the University community. This includes providing support and resources to students, faculty, and staff who are pregnant or caring for children. USJ encourages students who are pregnant to disclose this information to the Office of Accessibility Services if they are seeking accommodations.

The US Department of Education's regulation implementing Title IX specifically prohibits discrimination against a student based on pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery from any of these conditions. If you are a pregnant or parenting student, USJ has resources to help you.

ACCOMMODATION PROCESS

The Office of Accessibility Services engages in an interactive process with each student and reviews requests for accommodations on an individualized, case-by-case basis to implement appropriate accommodations. The Accessibility Director assists students who have a temporary condition such as pregnancy, which may result in functional limitations.

Please see the process for requesting Pregnancy & Parenting accommodations below:

1. Complete and Submit the Pregnancy and Parenting Accommodations Form
2. Submit Appropriate Documentation
 - a. The medical documentation should verify your pregnancy status and share detailed information supporting your requested accommodation(s).
 - b. The documentation can be submitted using the Pregnancy and Parenting Accommodations Form under 'Supporting Documentation' or sent to Accessibility@usj.edu, faxed or mailed.
3. Schedule and Complete an Intake Appointment
 - a. The Intake Appointment consists of completing paperwork and reviewing your approved accommodations.



POLICY STATEMENT

University of Saint Joseph is committed to creating and maintaining a community where all individuals enjoy freedom from discrimination, including discrimination on the basis of sex, as mandated by Title IX of the Education Amendments of 1972 (Title IX). Sex discrimination, which can include discrimination based on pregnancy, marital status, or parental status, is prohibited and illegal in admissions, educational programs and activities, hiring, leave policies, employment policies, and health insurance coverage. The University of Saint Joseph puts forth this policy for the protection and equal treatment of pregnant individuals; persons with

pregnancy related conditions; and new parents. USJ encourages students who are pregnant to disclose this information to the Office of Accessibility Services if they are seeking accommodations.

Under the Department of Education's (DOE) Title IX regulations, an institution that receives federal funding "shall not discriminate against any student, or exclude any student from its education program or activity, including any class or extracurricular activity, on the basis of such student's pregnancy, childbirth, false pregnancy, termination of pregnancy, or recovery therefrom." Per the DOE, appropriate treatment of a pregnant student includes granting the student leave "for so long a period of time as is deemed medically necessary by the student's physician," and then effectively reinstating the student to the same status as was held when the leave began. This generally means that pregnant students should be treated by the University of Saint Joseph the same way as someone who has a temporary disability, and will be given an opportunity to make up missed work or be provided with an alternative assignment. Extended deadlines, make-up assignments (e.g., papers, quizzes, tests, and presentations), tutoring, independent study, online course completion options where available, and incomplete grades that can be completed at a later date, may all be employed, in addition to any other assistive supports. To the extent possible, University of Saint Joseph will take reasonable steps to return pregnant students, who take a leave of absence or medical leave, to the same position of academic progress that they were in when they took leave. The Director of Accessibility Services has the authority to determine that such accommodations are necessary and appropriate, and to inform faculty members of the need to adjust academic parameters accordingly. As with disability accommodations, information about pregnant students' requests for accommodations will be shared with faculty and staff only to the extent necessary to provide the reasonable accommodation. Faculty and staff will regard all information associated with such requests as private and will not disclose this information unless necessary. Administrative and enforcement responsibility for these accommodations lies with the Accessibility Director or designee, who will maintain all appropriate documentation related to accommodations. 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 are 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, clinical coordinators, and the Accessibility Director 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 Accessibility Director will assist with plan development and implementation as needed.



SCOPE OF POLICY

This policy applies to all aspects of University of Saint Joseph's programs, including, but not limited to, admissions, educational, programs and activities, extracurricular activities, hiring, leave policies, employment policies, and health insurance coverage.

DEFINITIONS

- a. *Caretaking*: caring for and providing for the needs of a child.
- b. *Medical Necessity*: a determination made by a health care provider (of the student's choosing) that a certain course of action is in the patient's best health interests.
- c. *Pregnancy and Pregnancy related conditions*: include (but are not limited to) prenatal care, pregnancy, childbirth, false pregnancy, conditions arising in connection with pregnancy, and recovery from childbirth.
- d. *Parenting*: the raising of a child by the child's parents in the reasonably immediate postpartum period following childbirth and is interpreted to include the first year following pregnancy.
- e. *Pregnancy Discrimination*: includes treating an individual affected by pregnancy or a pregnancy related condition less favorably than similar individuals not so affected, and includes a failure to provide legally mandated leave or accommodations.
- f. *Pregnant Student/Birth-Parent*: refers to persons who fall under the scope of this policy and, relevant state or federal regulations, guidance or laws, who are or were pregnant. This policy and its pregnancy-related protections apply to all pregnant persons or students, regardless of gender identity or expression.
- g. *Reasonable Accommodations*: (for the purposes of this policy) a modification that allows a pregnant or parenting student to benefit from a program or activity, where such an accommodation does not constitute a substantial change or fundamental alteration to an essential element of a course or program or pose an undue burden on the University.

REASONABLE ACCOMMODATION OF PERSONS AFFECTED BY PREGNANCY, CHILDBIRTH, OR RELATED CONDITIONS

- a. University of Saint Joseph and its faculty, staff and other employees will not require students to limit their activities as the result of pregnancy or pregnancy-related conditions.
- b. The benefits and services provided to students affected by pregnancy will be no less than those provided to students with temporary medical conditions.
- c. Students with pregnancy-related disabilities, like any student with a short-term or temporary disability, are entitled to reasonable accommodations so that they will not be disadvantaged in their courses of study or research, and may seek assistance from the Office of Accessibility Services, or a designee.
- d. No artificial deadlines or time limitations will be imposed on requests for accommodations, but the University of Saint Joseph is limited in its ability to impact or implement accommodations retroactively.



- e. Reasonable accommodations may include, but are not limited to:
1. Providing accommodations requested by a parent student to a 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. Excused absences
 5. Extending deadlines for assignments or make up exams for pregnancy-related absences
 6. Alternative testing options
 7. Offering remote learning options
 8. Excusing medically necessary leaves of absences (this must be granted, irrespective of classroom attendance requirement set by a faculty member, department or division)
 9. Granting leave per the University of Saint Joseph's medical leave of absence policy or implementing incomplete grades for classes that will be resumed at a future date; or
 10. Allowing lactating students reasonable time and space to express milk in a location that is private, clean, and reasonably accessible. Bathroom stalls do not satisfy this requirement. See page 10 for lactation room locations and use.

Nothing in this policy requires modification to the essential elements of any academic program. Pregnant students cannot be channeled into an alternative program or school against their wishes.

MODIFIED ACADEMIC RESPONSIBILITIES POLICY FOR PARENTING STUDENTS

- a. Students with child caretaking/parenting responsibilities who wish to remain engaged in their coursework while adjusting their academic responsibilities because of the birth or adoption of a child or placement of a foster child may request an academic modification period during the first 12 months from the time the child entered the home. Extensions may be granted when additional time is required by medical necessity or extraordinary caretaking/parenting responsibilities.
- b. During the modification period, the student's academic requirements will be adjusted and deadlines postponed as appropriate, in collaboration among the Title IX office, the Accessibility Director, the Registrar, and possibly an appropriate faculty contact person.
- c. Students seeking a period of modified academic responsibility may consult with the Accessibility Director to determine appropriate academic accommodations requests. The Accessibility Director will determine eligibility. The Office of Accessibility Services (in conjunction with Title IX) will communicate authorization of an accommodation under this policy to the registrar for documentation and distribution to any employee or department instructed to make an accommodation. The Accessibility Director will oversee this process and distribute accommodations to the appropriate professors. Unless the accommodation is too burdensome to enact without disclosure, the Title IX office, the Accessibility Director, and the Registrar will work to maintain the privacy of students who requests that the details of why the accommodation is sought not be disclosed. The student will communicate to the Accessibility Director, any accommodated related efforts, and apprise of any concerns or issues with the accommodation. Students who are granted accommodations are encouraged to work with their faculty, advisors,



or clinical coordinators to reschedule course assignments, lab hours, examinations, or other requirements, and/or to reduce their overall course load, as appropriate. If for any reason, caretaking/parenting students are not able to work with their advisors/faculty members to obtain appropriate modifications, students should alert the Accessibility Director as soon as possible for assistance facilitating needed accommodations and modifications.

- d. In time degree, certification or credentialing programs, students who seek modification upon the both or placement of their child will be allowed an extension of up to 12 months or two semesters to prepare for and take preliminary and qualifying examination, and an extension up to 12 months toward normative time to a degree while in candidacy, to the extent those deadlines are controlled by University of Saint Joseph. Longer extensions may be granted in extenuating circumstances.
- e. Students can request modified academic responsibilities under this policy regardless of whether they elect to take a leave of absence.
- f. While receiving academic modifications, students will remain registered and retain benefits accordingly.

LEAVE OF ABSENCE

- a. As long as students can maintain appropriate academic progress, faculty, staff, or other University of Saint Joseph employees will not require them to take a leave of absence or withdraw from or limit their studies as a result of pregnancy, childbirth, or related conditions. Nothing in this policy should be interpreted to require the modification of the essential elements of any academic program.
- b. Enrolled students may elect to take a leave of absence for up to 2 semesters 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.
- c. Students taking a leave of absence under this policy will provide notice of the intent to take leave 30 calendar days prior to the initiation of the leave, or as soon as practicable. Students who are hospitalized unexpectedly or students who must take leave on an emergency basis and lack the ability to physically return to campus may contact any of the following offices to begin the process for requesting a pregnancy related leave of absence: the Accessibility Director, the Title IX office, the Registrar, and/or the Student Health Center. Students may fill out a FERPA release to allow another person such as a, parent, partner, or caregiver to have access to their student records in the event the student is incapacitated. Federal law does not allow third parties to access student records or make adjustments of any kind to the student's schedule without a signed release form. The release can be withdrawn by the student at any time. A FERPA release form may be obtained from the Registrar's office.
https://my.usj.edu/ICS/Student/Office_of_the_Registrar/Office_of_the_Registrar.jnz
- d. Intermittent leave may be taken with the advance approval of the Office of Accessibility Services in conjunction with Title IX Office.
- e. Students who elect to take leave under this policy may register, under an on-leave status, to continue their eligibility for certain benefits. While registered under that status, students who choose to take a leave of absence under this policy can elect to keep their health insurance, and continue to access campus facilities and the library. Students who are not registered for full-time classes may not occupy student housing.



- f. To the extent possible, the University of Saint Joseph will take reasonable steps to ensure that upon return from leave, students will be reinstated to their program in the same status as when the leave began, with no tuition penalty.
- g. Continuation of a students' scholarship, fellowship, or similar University of Saint Joseph 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 status for their scholarship, fellowship, or similar University of Saint Joseph supported funding by exercising their rights under this policy.
- h. The Office of Accessibility Services can and will advocate for students with respect to financial aid agencies and external scholarship providers in the event that a leave of absence places eligibility into question.

STUDENT-EMPLOYEE LEAVE

- a. All student-employees may be entitled to the protections of the federal Family and Medical Leave Act (FMLA) and/or Connecticut Family and Medical Leave Act (CFLMA), regardless of whether they are also students or hold post-doctoral status. Eligibility for FMLA/CFMLA protections depend on the length of employment and hours worked annually.
- b. Pregnancy and related conditions will be treated as any other temporary disability for job purposes, including leave and benefits.
- c. If the employees in this class are ineligible for benefits or leave: Pregnancy related conditions will be regarded as a justification for a leave of absence without pay for a reasonable period of time, at the conclusion of which employees will be reinstated to the status that they held when the leave began or to a comparable position, without decrease in the rate of compensation or loss of promotional opportunities, or any other right or privilege of employment.

RETALIATION AND HARASSMENT

- a. Harassment of any member of the University of Saint Joseph community based on sex, gender identity, gender expression, pregnancy or parental status is prohibited. The Title IX Office or a designee investigates complaints of retaliation. Violation of this policy may subject employees and students to disciplinary measures.
- b. Faculty, staff and other University of Saint Joseph employees are prohibited from interfering with students' right to take leave, seek reasonable accommodation, or otherwise exercise their rights under this policy.
- c. Faculty, staff, and other University of Saint Joseph employees are prohibited from retaliating against students for exercising their rights articulated by this policy, including imposing or threatening to impose negative educational outcomes because students request leave or accommodations, file a complaint, or otherwise exercise their rights under this policy, the United States Department of Education, or any other applicable authority.
- d. The Accessibility Director in conjunction with the Title IX Coordinator has the authority to enforce this policy. Reports or concerns of retaliation or harassment under this policy may be made by any USJ community member by contacting the following:



Abby-Lyn Dorman, Director of Accessibility Services
McGovern 201
(860) 231-5730
adorman@usj.edu

Brandon Dawson, Dean of Student Life/Interim Title IX Coordinator
McGovern Hall
(860) 231-5430
bdawson@usj.edu

Sheri Lee, Human Resources Director/Deputy Title IX Coordinator
Mercy Hall
(860) 231-5390
slee@usj.ed

HOUSING-RELATED ACCOMMODATIONS

Pregnant students' on-campus housing status will not be altered based on pregnancy status unless requested by the pregnant student. Parenting students' access to campus housing is governed by the University Housing agreement.

DISSEMINATION OF THE POLICY AND TRAINING

A copy of this policy will be distributed to faculty, staff, and employees on an annual basis and be available on the University of Saint Joseph website. The University of Saint Joseph will alert all students about this policy via the University Student Affairs website and Student Handbook. The Title IX Office will provide educational materials and trainings to members of the University of Saint Joseph to promote compliance with this policy, and familiarity with its procedures. The Title IX office works in conjunction with, Human Resources, and the Division of Student Affairs to provide education and awareness of this policy. The Title IX Office encourages departments and divisions to contact the Title IX Coordinator for trainings and presentations.



COMPLIANCE

Reporting: Any member of the University of Saint Joseph community may report a violation of this policy to any supervisor, manager, or to the Title IX Coordinators. All employees are responsible for promptly forwarding such reports to the Title IX office. The Title IX Coordinator is responsible for overseeing complaints of discrimination involving pregnant and parenting students. The Title IX Coordinator is also responsible for enforcing this policy and any relevant federal or state guidance, regulations or statutes.

The Title IX Coordinators for the University of Saint Joseph are:

Brandon Dawson, Dean of Student Life
McGovern Hall
(860) 231-5430
titleix@usj.edu or bdawson@usj.edu

Sheri Lee, Director of Human Resources
Mercy Hall, Business Center
(860) 231-5390
(860) 231-5273
titleix@usj.edu or slee@usj.edu

Oluwole Oke, Ass. Director of Athletics/Deputy Title IX Coordinator
O'Connell Athletic Center
(860) 231-5271
oake@usj.edu

Complaints may also be filed with the U.S. Department of Education's Office for Civil Rights at:

Office for Civil Rights (OCR)
U.S. Department of Education
8th Floor
5 Post Office Square
Boston, MA 02109-3921
Telephone: (617) 289-0111
Facsimile: (617) 289-0150
[Email: OCR.Boston@ed.gov](mailto:OCR.Boston@ed.gov)

Complaints may be filed online, using the form available, at www.ed.gov/ocr/complaintintro.html



LACTATION ROOM LOCATIONS AND USE

The University of Saint Joseph maintains two lactation room locations on our West Hartford campus for both employees and students. Refrigerators located in these spaces are for the sole purpose of storing lactated milk. Food or non-lactated materials found in the refrigerator or rooms will be removed. Under no circumstances should this space be occupied by anyone who is not expressing milk or nursing a child.

1. **McDonough Hall, 1st Floor.** Next to room 108 is a lactation room, this can be found in the same hallway as the unisex bathrooms on the first floor near the registrar's office. This space contains a sink, refrigerator, table, and chair.
2. **Lourdes Hall 2nd Floor.** This room is located at the end of the second-floor hallway. Make a left off the elevator or stairwells. This space contains a sink, refrigerator, and lounge chair. If you cannot access Lourdes Hall because it is locked, please contact public safety at (860) 231-5222 and request access to the building.

Please contact the University Title IX Coordinator at titleix@usj.edu or (860) 231-5499 if you have any concerns or questions about the use of this space.

After Hours: if you have a concern that requires immediate attention such as, access to the space or vandalism that compromises the use of the space, please contact Public Safety. Please see below for their information:

- Location: McDonough Hall, Lower Level
- Phone: (860) 231-5222.

Thank you,
Title IX Office