Oklahoma Christian University

Policy and Procedures for Students Addressing Pregnancy and Related Conditions
Title IX of the Education Amendments of 1972
Effective: August 1, 2024

I. Preamble

Oklahoma Christian University is committed to providing a supportive learning environment for students who are pregnant, were recently pregnant, have pregnancy-related conditions (e.g. childbirth, lactation, related medical conditions, or recovery) in order to access the University's education programs and activities.

II. Overview

Under the Department of Education's 2024 Title IX Final Rule, an institution that receives federal funding "shall not discriminate in its education program or activity against any student based on the student's current, potential, or past pregnancy or related conditions." This means that students who are pregnant or have related conditions will be treated by the University in the same manner as any other temporary medical condition and the University will not discriminate in its education program or activity against any student based on pregnancy or related conditions. However, the University does not engage in discrimination when it allows a student, based on pregnancy or related conditions, to voluntarily participate in a separate portion of its education program or activity provided the University ensures that the separate portion is comparable to that offered to students who are not pregnant and do not have related conditions.

III. Definitions

1. **Accessibility Resources Office:** Works with the faculty, University employees, and students to mitigate institutional barriers and equip students to have equal access to educational programs and activities.

2. **Pregnancy and Related Conditions:** (1) Pregnancy, childbirth, termination of pregnancy, or lactation; (2) Medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or (3) Recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

3. **Pregnancy Discrimination:** Limiting or not providing access to the University's education programs and activities due to pregnancy or pregnancy-related conditions in the same manner and under the same policies as any other temporary medical conditions. It is a form of sex discrimination.

4. **Reasonable Modifications:** Changes in the University policies, practices, or procedures as necessary to prevent sex discrimination for pregnancy or related conditions. Each reasonable modification is based on the student's individualized needs by consulting with the student.

IV. Obtaining Reasonable Modifications and Confidentiality

While the disclosure of pregnancy and related conditions is entirely voluntary, in order to receive all the necessary reasonable modifications and/or a temporary leave of absence, a student must disclose the pregnancy or related conditions to the Accessibility Resources Office and/or the Title IX Coordinator. The Accessibility Resources Office can provide the required documentation for a short-term medical (disability) leave and as needed, will inform instructors and other University employees of all reasonable modifications formulated through that office for a student.

The Title IX Coordinator and the Accessibility Resources Office will keep pregnancy, related conditions, and medical information confidential, to the extent possible, while implementing reasonable modifications. The reason[s] for a student's request for reasonable modifications will be shared with other University employees only to the extent necessary to provide the modifications and University employees will regard all information associated with such requests as confidential educational records under FERPA.

A student has the discretion to accept or decline each reasonable modification offered by the University. If a student accepts a modification offered by the University, the University must implement it.

A requested modification that the University can demonstrate would fundamentally alter the nature of its education program or activity is not a reasonable modification. **Nothing in this policy requires modification to the essential elements or learning outcomes of any academic program.**

To discuss and/or implement reasonable modifications, a student can contact one or both of the following offices.

Accessibility Resources Office
Mr. Michael Ferguson
Mabee Learning Center (MLC), Office C 218
michael.ferguson@oc.edu
(405) 425-5922

Title IX Coordinator
Ms. Tamie Willis
Garvey Center, Office 121
titleIX@oc.edu
(405) 425-6463

V. Reasonable Modifications

Based on a student's individual needs, the University will provide reasonable modifications for pregnancy and related conditions in the University's policies, practices, or procedures to ensure equal access to the University's education programs activities. A student is not required to notify University employees about a pregnancy or related conditions but without a notification by a student to the Accessibility Resources Office or the Title IX Coordinator, the University may not be able to provide all the individualized reasonable modifications available to a student.

With respect to academics, if a student prefers and is willing to disclose a pregnancy or related condition to an instructor[s] or academic advisor, the student can work with the instructor[s] and/or academic advisor to devise a plan to (1) address any limiting conditions as pregnancy progresses; (2) anticipate the need for absences or a temporary leave; and (3) determine

individual modifications needed to achieve a successful academic outcome. However, the Accessibility Resources Office and/or the Title IX Coordinator are available to assist with reasonable modifications and to make sure a student is aware of all the support provided through Title IX. If requested by a student, the Title IX Coordinator will (1) partner with the Accessibility Resources Office and assist with plan development and facilitate implementation of reasonable academic modifications, temporary medical leave, or other issues that may arise; and (2) inform the student's instructors, academic advisor, and/or other University employees of the required academic modifications while upholding a student's confidentiality.

The University will not require supporting documentation of pregnancy and related conditions unless the documentation is necessary and reasonable for the university to determine the reasonable modifications to make or whether to take additional specific actions.

The University will not require a student who is pregnant or has related conditions to provide certification from a healthcare provider or any other other person that the student is physically able to participate in a university class, program or extracurricular activity unless: (1) the certified level of physical ability or health is necessary for participation in the class, program, or extracurricular activity; (2) the University requires such certification of all students participating in the class, program, or extracurricular activity: and (3) the information obtained is not used as a basis for prohibited discrimination.

For students who are pregnant or have a related condition[s], reasonable modifications may include, but are not limited to:

1. Students who must take a medical short-term leave of absence shall be allowed to return to their course of studies with the same academic and extracurricular status as before the leave began.

2. At their sole discretion, students may decide to withdraw from the University, either permanently or for a period of time, due to pregnancy or related conditions. The University's withdrawal and/or readmission procedures will apply.

3. No artificial deadlines or time limitations will be imposed on requests for reasonable modifications, however, reasonable modifications cannot be implemented retroactively.

4. Students have the right to participate in and complete internships related to their academic work. If health concerns related to pregnancy or related conditions impact the completion of an internship, students are encouraged to contact their supervisor and/or the Title IX Coordinator.

5. Students receiving financial assistance or a scholarship[s] from the University will not be negatively impacted by pregnancy or related conditions. However, the financial aid received by students who decide to temporarily withdraw from the University for non-medical reasons related to the pregnancy or related conditions could be impacted. Students are strongly encouraged to speak with their financial aid counselor if considering this option.

6. Reasonable modifications to protect the health and safety of a student and/or the pregnancy, such as allowing the student to maintain a safe distance from hazardous substances.

7. Making reasonable modifications to the physical environment such as, accessible seating, a larger desk or a footrest, elevator access, allowing a student to sit or stand or keep water nearby.

8. Allowing breaks during class for the purpose of attending to health needs associated with pregnancy and related conditions, including eating, drinking or using the restroom.

9. Allowing breaks during class for the purpose of lactation.

10. Extending time for coursework, rescheduling examinations, and allowing a student to make up examinations or assignments because of absences due to pregnancy and related conditions.

11. Changes in schedule or the course sequence

12. If attendance is graded, an alternative way of making up missed attendance points must be provided.

13. Offering remote learning options.

14. Providing the option of receiving an incomplete grade for a course[s] that will be resumed at a later date.

15. Excusing medically necessary absences must be granted, irrespective of classroom attendance requirements set by an instructor, program, department, college, or the University. Upon their return, students will be reinstated, to the extent possible, to the same status held prior to the absence.

VII. Leave of Absence

1. As long as a student can maintain appropriate academic progress, University employees will not require a student to take a leave of absence or withdraw from or limit their studies as the result of pregnancy or related conditions. It is important to remember that nothing in this policy requires modification of the essential elements or learning objectives of any course or academic program.

2. An enrolled student may elect to take a leave of absence because of pregnancy or related conditions. The leave of absence is initiated through the Accessibility Resources Office, under Federal guidelines, and may be extended in the case of extenuating circumstances or medical necessity.

3. To the extent possible, the University will take reasonable steps to ensure that upon return from leave, a student will be reinstated to their academic program with the same academic status as when the leave began. A student will not be negatively impacted by or forfeit their future eligibility for their University scholarship/s or similar University-supported funding by exercising their rights of a leave of absence under this policy.

4. A student who re-enroll at the University after earning more than 15 hours at another institution will be treated as a transfer student and university transfer scholarship awarding policies will apply.

5. A student should contact Financial Services with any questions they have regarding tuition and financial aid. The Title IX Coordinator will facilitate this communication if needed by the student.

6. The Title IX Coordinator can be an advocate for students with respect to financial aid in the event that a medical leave of absence places their eligibility into question and all other aspects of reasonable modifications.

VIII. Retaliation and Harassment

1. Harassment, based on pregnancy or parental status, by any member of the University community is prohibited.

2. University employees are prohibited from interfering with a student's right to take leave, seek reasonable modifications, or otherwise exercise their rights under this policy.

3. University employees are prohibited from retaliating against a student for exercising the rights articulated by this policy, including imposing, or threatening to impose negative educational consequences because a student (1) requests a leave of absence or reasonable modifications; files a sex discrimination complaint; or (3) otherwise exercises their rights under this policy.

IX. Complaints or Notification of Sex Discrimination

The Title IX Coordinator is responsible for overseeing student complaints of sex discrimination involving pregnancy and related conditions. If a student is experiencing harassment, discrimination, or retaliation due to pregnancy or a related conditions, the TItle IX Coordinator will address the complaint through the procedures and supportive measures outlined in the University's *Policy and Grievance Procedures Addressing Sex Discrimination*.

A written or oral notification or complaint of sex discrimination can be submitted directly to the University's Title IX Coordinator and/or a complaint can be submitted to the Department of Education. Written complaints or notifications to the Title IX Coordinator can be delivered in person, by mail, or through an electronic submission such as email or the University's online student complaint portal at https://services.oc.edu/Forms/StudentComplaint.

Title IX Coordinator
Ms. Tamie Willis
Oklahoma Christian University
Garvey Center #121
titleIX@oc.edu
Phone: (405) 425-6463

Office for Civil Rights (OCR)
U.S Department of Education
One Petticoat Lane
1010 Walnut Street, Suite 320
Kansas City, MO 64106
Phone: (816) 268-0559
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