

ACCOMMODATION POLICY FOR PREGNANT & PARENTING STUDENTS

The Ross University School of Medicine (RUSM) is committed to creating an inclusive environment for pregnant and parenting students. In accordance with Title IX of the Education Amendments of 1972, the RUSM prohibits the adoption and/or implementation of any policy, practice, or procedure that has the potential to contribute toward the harassment and/or discrimination of any member of its community based on sex, sex stereotypes, sex characteristics, sexual orientation, gender identity, gender expression, marital status, parental status, and pregnancy or related conditions – which includes, but is not limited to, current, potential, or past pregnancy or related conditions such as childbirth, false pregnancy, termination of pregnancy, or recovery from any of these conditions. This policy and its pregnancy-related protections apply to all pregnant students, regardless of gender identity or expression.

The Adeptem Global Education Office of Equity and Access ("OEA"), in partnership with the RUSM, assists pregnant and parenting students in understanding the academic-related alternatives that may be available to them throughout their pregnancy, when pregnancy-related conditions arise (which 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), and when accommodations and/or modifications are needed due to extenuating circumstances that arise from parenting responsibilities (within the first 12 months of the child entering the home).

Definitions

Under this policy, a parent, and/or parental status, is defined as: the status of a person who, with respect to another person who is under the age of 18 or who is 18 or older but is incapable of self-care because of a physical or mental disability, is:

- A biological parent;
- An adoptive parent;
- A foster parent;
- A 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.

Under this policy, pregnancy and/or pregnancy-related conditions are defined as: the full spectrum of processes and events connected with pregnancy – which includes, but is not limited to,

- pregnancy, childbirth, termination of pregnancy, or lactation;
- medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; and
- recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

Reasonable Accommodation/Modification

Students who are pregnant or are experiencing pregnancy-related conditions – which includes, but is not limited to, current, potential, or past pregnancy or related conditions such as childbirth, false pregnancy, termination of pregnancy, or recovery from any of these conditions, are entitled to reasonable accommodations and/or modifications to prevent sex discrimination and ensure equal access to the RUSM's education program and activity.

Reasonable accommodations and/or modifications to RUSM's policies, practices or procedures are designed to prevent sex discrimination to ensure equal access to the RUSM's education program and activity as well as to support the student in meeting the program's technical standards. That said, reasonable accommodations and/or modifications may include, but are not limited to:

- Excusing pregnancy-related medically necessary absences
- Providing mobility support
- Extending deadlines and/or allowing students to make up tests, assignments, and class participation due to pregnancy-related medically necessary absence(s)
- Allowing students to complete course assignments on an alternate schedule as needed
- Allowing breastfeeding students reasonable time to express breast milk, store breast milk, or breastfeed as needed in a lactation space that is not a bathroom and is clean, shielded from the view of others, lockable and free from the intrusion from others, and is reasonably accessible
- Providing reasonably timed breaks during lecture, lab, and/or clinical experiences in order to attend to health and/or medical needs associated with pregnancy or pregnancy-related conditions – which includes, but is not limited to, the ability to eat, properly hydrate and/or keep water nearby, utilize the restroom, and/or sit or stand as needed
- Allowing reasonable accommodations to academic responsibilities for parenting students during the first 12 months from the time the child enters the home due to a parenting-related extenuating circumstance
- Granting leave per the RUSM's Leave of Absence (LOA) policy and/or implementing incomplete grades for classes that will be resumed at a future date within the institution's academic policies
 - To note, since the option to request and

receive an approved Leave of Absence and/or Incomplete grade is an alternative that is available to all students, it would therefore not be considered an accommodation that the Office of Equity and Access would facilitate. This is optional and the process is handled by the RUSM's Academic team.

Additionally, under this policy, an accommodation and/or modification that fundamentally alters the nature of RUSM's education program or activity is not a reasonable accommodation and/or modification.

In situations such as clinical rotations, examinations, skills-based assessments, labs, and group work experiences, the OEA as well as the RUSM will work with the student to develop an alternative path to completion, if possible. Secondary to obtaining formal, approved accommodations and/or modifications from the OEA, students are encouraged to continue to work with their institutional faculty members, academic leadership representatives, and academic advising teams to discuss a plan for how to best address conditions that arise as pregnancy progresses and/or as pregnancy-related conditions emerge. The Equity Coordinator for the OEA and/or the RUSM's Title IX Coordinator will assist with plan development and implementation as needed.

Process

A student who has a request or inquiry regarding the potential need for reasonable accommodations and/or modifications as related to their pregnancy and/or pregnancy related conditions – which includes, but is not limited to, current, potential, or past pregnancy or related conditions such as childbirth, false pregnancy, termination of pregnancy, or recovery from any of these conditions – as well as any parenting-related needs must contact the OEA at equity@adtalem.com and/or 630-829-0233, to further discuss any of the reasonable accommodations and/or modifications that may be available based on their individual needs.

To initiate the formal Pregnancy and Parenting Accommodation and/or Modification Request process, students will be required to provide advanced written notice that explains their need for reasonable pregnancy and/or parenting-related accommodations and/or modifications to the OEA as well as their assigned faculty member(s) at least thirty (30) days prior to the date in which the requested accommodation and/or modification is needed, whenever possible. It is required for academic leadership representatives, faculty, staff, and advisors to recognize a request and to immediately refer the student and/or matter to the OEA to initiate the interactive process, as accommodations and/or modifications pursuant to this policy will not be approved retroactively.

It is difficult to say with certainty how long it can take to process requests, as many factors could impact timing (i.e., volume, complexity and availability of the student for follow up questions and/or the student's ability to provide supporting documentation, if needed, in a timely manner); however, once the OEA has received all necessary information, it will strive for a 5 business day turnaround.

After contacting the Office of Equity and Access, the Equity Coordinator will ask students to specify their pregnancy and/or parenting status as well as the accommodation(s) they are looking to obtain via the formal Pregnancy and Parenting Accommodation and/or Modification Request Form. This form asks for information on the specific pregnancy and/or parenting-related need – which includes, but is not limited to, any conditions related to current, potential, or past pregnancy or the recovery from any of these conditions – that is the basis of the request, as well as the accommodation and/or modification to policy, practice or procedure that is being requested. The OEA will then gather the necessary information to consider the request. Please note, in some cases, the OEA may need to obtain additional information and/or documentation about the student's specific pregnancy and/or parenting-related needs from the student's healthcare provider. A request for additional supporting documentation from a healthcare provider will only be required if deemed necessary and reasonable for the OEA and/or the RUSM to determine the reasonable accommodations and/or modifications to provide, or whether additional specific action will need to be taken by the OEA and/or the RUSM, with regard to a student's request(s).

Information about pregnant and/or parenting students' requests for accommodations and/or modifications will be shared with institutional faculty, staff, and/or academic leadership only to the extent necessary to provide the reasonable accommodation and/or modification.

If a request is granted, the Equity Coordinator will work directly with the student and any applicable RUSM personnel who will help to implement the approved accommodation(s) and/or modification(s).

If a request is denied, the Equity Coordinator will engage in a dialog with the student to explore any alternative reasonable accommodation and/or modification options, if appropriate. Denial of accommodations and/or modifications will not preclude students from requesting disability-related accommodations through the Office of Student Disability Services (OSDS).

Once accommodations and/or modifications have been implemented, students should continue to work with the OEA on any additional accommodation and/or modification related needs. If students experience difficulty in implementing or obtaining approved

accommodations and/or modifications, students must immediately notify the OEA for assistance in rectifying the situation.

Accommodations and/or modifications are granted on a case-by-case basis, as different resources may become available throughout the duration of a student's program. Although the same accommodations and/or modifications may still be available, adjustments to a student's approved accommodations and/or modifications may be necessary due to a new program location or modality. Students must also notify the OEA if they transfer institutions or programs, as a new accommodation and/or modification request may be required.

Questions related to accommodation and/or modification requests and complaints of discriminatory treatment or retaliation related to pregnancy and/or parenting status are to be directed to the Equity Coordinator at equity@adtalem.com or 630-829-0233 as well as the Title IX Coordinator, Sanyia Ingram, at singram@rossu.edu who can coordinate specific actions to prevent sex discrimination and ensure a student's equal access to RUSM's education program or activity.

Complaints may also be filed with the U.S. Department of Education Office for Civil Rights (OCR) regarding any concerns that arise with educational programs that are available within the United States. The U.S. Department of Education Office for Civil Rights (OCR) can be contacted at:

U.S. Department of Education
[Office for Civil Rights](#)
Lyndon Baines Johnson Department of Education Bldg
400 Maryland Avenue, SW
Washington, DC 20202-1100

Telephone: 800-421-3481
FAX: 202-453-6012; TDD: 800-877-8339
Email: OCR@ed.gov