

SNU Policy: Pregnancy Modifications Policy

SNU Policy ID: Benefit Information D-16

Policy Reviewed by: Director of Human Resources, Associate Vice President for Student Life, Dean of Student Life, and Vice President for Academic Affairs Professional and Graduate Studies, Associate Vice President for Student Success

Approval Authority: Executive Vice President and Title IX Coordinator, Executive Director of Financial Aid

Approval Date: October 28, 2024

Next Review Date: October 28, 2029

I. Policy Statement

Southern Nazarene University (the “University”) is committed to providing all students and employees (faculty and staff) with the opportunity to pursue and attain their individual goals as it relates to the University’s admissions, employment, and educational programs or activities. This commitment includes the University students and employees who are pregnant, parenting, or experiencing pregnancy related conditions. The University prohibits differential treatment or discrimination against students and employees based on the student or employee’s current, potential, or past parental, family, marital status, or pregnancy or related condition. The University holds to the biblical perspective that marriage is to take place between a man and a woman.

II. Definitions

For the purposes of this policy, “Pregnancy or related conditions” means:

- Pregnancy, childbirth, miscarriage, or lactation.
- Medical conditions related to pregnancy, childbirth, miscarriage, or lactation.
- Recovery from pregnancy, childbirth, miscarriage, lactation, or related medical conditions.

For the purposes of this policy, “Parental Status” means a person who is a biological parent; adoptive parent; stepparent; foster parent; legal custodian or guardian; in loco parentis with respect to a person; or a person who is actively seeking custody, guardianship, visitation, or adoption of a person.

A high-risk pregnancy is a pregnancy that has a higher-than-normal chance of experiencing problems for both the mother and baby. Some factors that can make a pregnancy high-risk include:

- Age: Being under 17 or over 35 when pregnant
- Medical history: Previous miscarriages, a family or fetal genetic condition, or a prior C-section
- Existing health conditions: High blood pressure, diabetes, HIV/AIDS, kidney disease, autoimmune diseases, or lupus
- Environmental triggers: Smoking, excess alcohol consumption, or illicit drug use
- Lifestyle habits: Obesity, unhealthy lifestyle habits, or activities that put pressure on the abdomen or put the mother in danger of falling

A high-risk pregnancy requires extra care and monitoring from a doctor.

III. Student Pregnancy Disclosure

A student who is, or becomes, pregnant or has a related condition is strongly encouraged to notify the Title IX Coordinator as soon as possible. By doing so, the student and the Title IX Coordinator can collaborate and develop an appropriate plan for the continuation of the student's education considering the unique nature of the University's programs and requirements, as well as challenges the student may face while pregnant or while experiencing a pregnancy related condition.

If a University employee is informed of a student's pregnancy or related condition by a student or a person who has a legal right to act on behalf of the student, the employee must provide the student or the student's representative with the Title IX Coordinator or Deputy Coordinators contact information for further assistance, unless the employee reasonably believes the Title IX Coordinator has already been notified.

Contact information for the University's Title IX Coordinator is as follows:

Dr. Mike Redwine
Executive Vice President, Title IX Coordinator
Southern Nazarene University
6729 NW Expressway
Webster Commons, 110C
Bethany, OK 73008
405-213-8010
mredwine@snu.edu

Contact information for the Title IX Deputy Coordinators is as follows:

Dr. Melissa Lewis
Vice President for Academic Affairs
Professional and Graduate Studies
6729 NW 39th Expressway
Royce Brown, 123
Bethany, OK 73008
405-717-6207
mlewis@snu.edu

Katy Bradley
Associate Vice President for Student Life and Dean of Students
Southern Nazarene University
6612 NW 42nd Street Webster
Commons, Lower Level Suite 110A
Bethany, OK 73008
405-491-6209
Email: kbradley@snu.edu

Gail Collier
Director of Human Resources
Southern Nazarene University

6729 NW Expressway
Bresee Administration Building 306
Bethany, OK 73008
405-491-6333
Email: gcollier@snu.edu

Nikki Dieball
Assistant Director of Compliance/Senior Woman Administrator
Southern Nazarene University
6729 NW Expressway
Sawyer Athletic Center #A121
Bethany, OK 73008
405-491-6650
Email: ndieball@snu.edu

The employee will also inform the student or the student's representative that the Title IX Coordinator or Deputy Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student's equal access to the University's education programs or activities. However, the choice to declare a student's pregnancy is voluntary, and students and employees are not required to disclose this information to the University.

After being notified by a student or the student's representative of the student's pregnancy or related condition, the Title IX Coordinator or Deputy Coordinator will do the following:

- Inform the student about the University's prohibition on sex discrimination, including sex-based harassment.
- If pregnancy is deemed high risk or has other medical conditions that may constitute a disability, inform the student of their right to apply for Disability Services.
- Provide the student with the option of reasonable modifications due to the student's pregnancy or related conditions. (Refer to page 4 for more information.)
- Allow the student voluntary access to any separate and comparable portion of the University's education programs or activities.
- Allow the student a voluntary leave of absence for medical reasons and reinstatement for the student upon return from leave.
- Provide the student with a private, clean space for lactation that is a space other than a bathroom and is shielded from view and free from intrusion from others.

The University will not require students to submit supporting documentation for the above items, unless the documentation is necessary and reasonable for the University to determine the reasonable modifications to make, or whether to take additional, specific actions. Situations where supporting documentation is not necessary may include, but are not limited to, when the student's need for a specific action is obvious, such as when a student who is pregnant needs a bigger uniform; when the student has previously provided the University with sufficient supporting documentation; when the reasonable modification at issue is allowing a student to carry or keep water nearby and drink, use a bigger desk, sit or stand, or take breaks to eat, drink, or use the restroom; when the student has lactation needs; or when the requested action is available to other students for reasons other than pregnancy or related conditions and such students are not required to submit supporting documentation.

Additionally, the University will not require a student who is pregnant or has a related condition to provide certification from a healthcare provider or any other person that the student is physically able to participate in the University's class, program, or extracurricular activity unless:

- The certified level of physical ability or health is necessary for the student's participation in the class, program, or extracurricular activity;
- The University requires such certification of all students participating in the class, program, or extracurricular activity; and
- The information obtained is not used as a basis for discrimination.

IV. Options After Student Pregnancy Disclosure

Once a student has voluntarily disclosed a pregnancy or related condition to the University, the student has the following options:

Continue in the Program

- If a student decides to continue in the program and desires to have any modifications to the University's education programs and activities due to the pregnancy or related condition, the student should contact their academic advisor to discuss any reasonable modifications that may be necessary for the student to continue in the program. Such modifications, if any, are discussed in Section V below, and will be documented in the form in Addendum A which will be signed by both the student and a University representative.
- The University will also allow a student to voluntarily access any separate and comparable portion of the University's education program or activity.

Voluntary Leave of Absence

- Students have the option to take a leave of absence due to pregnancy or related condition. However, such a leave of absence is not required. Should a student choose to take a leave of absence, a student is permitted to do so based on the medical recommendation of the student's licensed healthcare provider.
- A leave of absence due to pregnancy or related conditions may be for various amounts of time depending on a student's particular circumstances and the period deemed medically necessary by the student's licensed healthcare provider. Such a leave may be extended if deemed medically necessary by the student's licensed healthcare provider.
- Students are encouraged to communicate with faculty and supervisors regarding plans for leave to ensure a smooth return to campus.
- International students are further encouraged to contact their international advisor immediately, as a leave could require the student to leave the country.
- Veteran-military affiliated students are encouraged to contact the SNU VETS Center and speak with a Certification Official. Any change in a student status may impact a student's VA education benefit.
- When a student returns from a leave of absence, the student will be reinstated to the same academic status and, where applicable, extracurricular status, that the student held prior to their leave of absence. This includes the opportunity to make up any work the student missed while on leave.

- If taking a leave of absence due to a pregnancy or related condition, the Education Plan in Addendum B will be discussed and signed by the student and a University representative.

Withdraw from the University

- The student may, in their sole discretion, determine that they must withdraw from the University for an indefinite period or permanently due to their pregnancy or related condition. Existing University withdrawal procedures, and readmission procedures (if applicable) apply.

V. Reasonable Modifications for Students

The University will treat pregnancy or related conditions, or temporary disability resulting from pregnancy or related conditions, consistent with the University's policy on temporary medical conditions and with respect to any medical benefit, service, plan, or policy the recipient administers, operates, offers, or participates in with respect to students admitted to the recipient's education program or activity.

Reasonable modifications for pregnancy or related conditions will be provided to students based on their individualized needs. Such reasonable modifications will be identified through an interactive process with the student and the student's individual professors, led by the academic advisor; however, a modification is not reasonable if it fundamentally alters the nature of the University's education program or activity.

Reasonable modifications may include, but are not limited to:

- Breaks during class to attend to any necessary medical or lactation needs
- Access to online education or missed content for traditional students
- Professional and Graduate Studies advisors will help students transition to online courses or programs when possible.
- Attendance flexibility for scheduled medical appointments with prior notification, if possible.
- Schedule or course changes
- Test rescheduling
- Time extensions for coursework
- Counseling
- Physical space or supply changes
- Elevator/classroom access
- Other appropriate policy, practice, or procedure modifications

Students may accept or decline each reasonable modification offered by the University. The student would coordinate reasonable modifications with their academic advisors.

Students with high-risk pregnancies seeking medical accommodations due to the pregnancy would need to coordinate the accommodations with the Office of Disability Services.

VI. Reasonable Modifications for Employees

A. Purpose:

Southern Nazarene University recognizes that maintaining a balance between work and family is necessary for optimized employee work performance. The university is committed to supporting employees who choose to breastfeed. To assist employees with challenges associated with workplace milk expression, the university has implemented a Workplace Lactation Policy.

Benefits of the program include:

1. Healthier babies – Research shows that breastfed babies get sick less often and have fewer visits to the doctor than babies that receive formula.
2. Increased attendance – Due to less time lost for care of sick children;
3. Reduced cost – Due to fewer insurance claims for sick children and mothers;
4. Reduced turnover – Due to mothers opting to return to work because private locations are provided for milk expression and breastfeeding; and
5. Increased morale – Due to the university's support for breastfeeding employees.

B. University Responsibilities:

- a. The University will treat employee pregnancy or related conditions as any other temporary medical condition for all job-related purposes and will provide accommodations as appropriate. The Faculty and Staff must adhere to the American with Disabilities Policy for Staff and Faculty when requesting an accommodation.
- b. The University will further adhere to its leave policies for employee pregnancy or related conditions.

C. Employee Procedures:

1. Support for Workplace Lactation

- a. Employees who wish to express milk or breastfeed during work hours are entitled to take reasonable breaks as frequently as needed for up to one year following the birth of the employee's child. Exceptions beyond one year should be discussed in advance with the supervisor.
- b. The frequency and duration of breaks for this purpose may vary as determined by the needs of the mother. Nursing mothers utilize their normal break and lunch periods. The frequency and amount of break time allowed to express breast milk may vary and will include the time required to gather, clean, store necessary equipment, and any necessary travel time to and from the location used to express milk.
- c. If the time needed to express milk or nurse exceeds the normal time for breaks and lunch, employees may work predetermined and approved flexible work schedules to accommodate lactation.

D. Responsibilities for supervisors and employee:

1. Supervisors shall:

- a. Discuss with an expectant mother her potential plans to express milk upon return to work. This will allow planning time to make adjustments as needed. The supervisor may delegate this responsibility to Human Resources.
- b. Supervisors are responsible for ensuring that the duties of the nursing mother are covered during her expression or breastfeeding breaks.
- c. Supervisors are responsible for alerting pregnant and breastfeeding employees about this policy for lactation support.

2. Employees shall:

- a. Communicate with their supervisor regarding scheduling or other needs as far in advance as possible if planning to express breast milk or breast feeding while at work and comply with agreed flexible schedules.
- b. If an employee prefers, she may also express milk in her own private office, or in another private location agreed upon in consultation with the employee's supervisor and Human Resources.

VII. Lactation Room & Information

The University lactation room on campus for breastfeeding for students and employees is located on the 3rd floor of the R.T. Williams Learning Resource Center (library) room #345. The designated area provides a private area shielded from view and free from intrusion from coworkers and the public. There is a nearby sink and refrigerator available in the kitchen next to room #345.

VIII. Questions or Concerns

A student who has questions about this policy or who is concerned about its implementation should contact the Title IX Coordinator or Deputy Coordinator using the contact information listed in Section II of this policy. Employees with questions about the policy or concerns about its implementation should contact HR at:

Gail Collier
Director of Human Resources
Email: gcollier@snu.edu
Phone: 405-491-6333
Bresee Hall 306, Main Campus

Addendum A
Continuation in Program after Disclosing Pregnancy

I. Acknowledgements

By signing this form, [INSERT STUDENT NAME] (“Student”) acknowledges the following:

- Student has voluntarily disclosed their pregnancy to Southern Nazarene University (the “University”) and intends to continue pursuing their degree in the University’s [INSERT PROGRAM/ATHLETIC/CO-CURRICULAR ACTIVITY].
- Student understands there are other options available, including taking a leave of absence.
- Student understands there are potential risks to them and/or their baby by continuing in the [INSERT PROGRAM/ATHLETIC/CO-CURRICULAR ACTIVITY]. The University has advised Student to consult with their doctor to discuss these potential risks.
- Student assumes all responsibility related to these risks and any resulting losses or costs, including medical treatment and costs thereof.

II. Adjustments to Program

[In this section, describe any modifications that have been discussed and will be implemented based on the student’s pregnancy or related condition. Note if there have been no modifications implemented at the time of signature.]

A. [insert modification]

B. [insert modification]

C. Student may request additional modifications at any time by contacting [insert University personnel contact]

The University and Student do hereby agree to the above.

[INSERT NAME], Student

Date

[INSERT NAME], [INSERT POSITION TITLE]
Southern Nazarene University

Date

Addendum B

Education Plan for Pregnancy Leave

Southern Nazarene University (the “University”) and [INSERT NAME OF STUDENT] (“Student”) have agreed to the following conditions related to Student’s leave of absence related to their pregnancy or related condition. Student’s leave of absence is scheduled to begin on [INSERT DATE] and Student is anticipating a return to school [INSERT DATE OR TERM]. Student and the University acknowledge that Student may take a longer leave if it is deemed medically necessary by Student’s doctor, and the parties agree to meet and discuss this Education Plan if that occurs.

I. Academics

For students in the College of Undergraduate Studies programs, the student will work with an academic advisor to develop a detailed plan of study outlining the remaining requirements needed to graduate and the agreed upon schedule to meet those requirements.

For students in Professional Studies and Professional and Graduate programs, the student will work with an advisor to develop a detailed plan of study outlining the remaining requirements needed to graduate and the agreed upon schedule to meet those requirements. If the learner is a veteran-military affiliated student, the learner will also work with the assigned VETS Center Certification Official to ensure any impacts to VA education benefits are captured in the new plan of study.

II. Financial Aid/Scholarships

A. Traditional Students

For students in traditional programs, there is no financial aid leave of absence policy because the Financial Aid laws require the student to restart at the same place academically and in the same semester as when they left. Since the traditional programs at SNU are not modular, there would be no later module for the student to resume. Alternatives to a Leave of Absence could include:

1. Taking an incomplete and finishing the course work at a later time within SNU’s grading policy for incomplete classes.
2. Working with the professor to keep up the course work while the student was not able to attend classes.

The Financial Aid office would be required to treat the student as a withdrawal for the remainder of term. If the student received federal financial aid, SNU would calculate how much, if any, of the student’s financial aid would need to be returned to the Department of Education. The student would also be listed as withdrawn with the National Student Loan Database System (NSLDS) and loans would enter their grace period. In most cases, if the student returns to SNU the next term, the first payment would not be due until the student returns. If the first payment is due before the student returns, a forbearance request could be filed by the student with their federal loan servicer to delay payments until the student was enrolled again. Once re-enrolled the student would be on student deferment.

If a student is a veteran-military affiliated student utilizing VA education benefits, the student must consult with the SNU VETS Center and speak with a Certification Official to determine if any change in status will have an impact with the VA education benefit being used by the student.

B. PGS Students

Southern Nazarene University understands that life events may require a learner to modify class enrollment and schedules. This Leave of Absence (LOA) policy is designed to allow the learner some flexibility in his/her program enrollment to adjust to these life events.

Learners must return to their program at the same point academically where they left (i.e. if a learner begins a LOA between modules 5 and 6, they must begin module 6 upon their return.) A learner should meet with their academic advisor for help with planning their return.

Learners on an approved LOA will be considered enrolled and would be eligible for an in-school deferment for student loans. Federal student aid and in-school deferment may be negatively affected if a learner fails to apply for an LOA or the application is denied. This impacts learners who receive Title IV federal student aid (Pell Grants, SEOG funds, Federal Direct Subsidized and Unsubsidized Student Loans, and Federal PLUS loans, either Grad PLUS or Parent PLUS) or who want to have a loan deferred while in school.

Learners who will be out of school for over 45 calendar days will need to obtain an approved LOA or they will need to be withdrawn from their program and re-enrolled when they return. This could result in SNU returning funds to the Department of Ed and re-awarding financial aid upon the learners return. The leave of absence may not be more than 180 days and must begin and end in the same financial aid award year.

Learners who have class waivers may use the LOA policy for continued enrollment during waived classes.

A learner must apply for the LOA at least 14 days before the leave would start except in cases of illness or injury when the learner cannot physically apply. In such cases, the application must be completed as soon as the learner can reasonably be expected to do so. In some cases, documentation may be required. A learner may not accumulate more than 180 days of LOA in a 12-month period. A learner must state the date they intend to return from the LOA. Extensions can be made during the LOA if the learner requests such, they have not accrued more than 180 days in a 12-month period, and there is a class available which will allow the learner to return at the same point they left the program.

If a learner fails to return from an approved LOA by the date stated on the application, or any approved extension, the learner's date of withdrawal will be backdated to the first day of the LOA and SNU will perform an return of Title IV funds (R2T4) calculation to see what, if any, funds need to be returned to the Department of Education. Also the last day of the learner's enrollment will be reported

as the day before the first day of the approved LOA. This will then start the grace period on any learner loans. If a learner returns early from a LOA, the LOA will be shortened according to the learner's return date, but the learner still must return at the point they left the program.

Any financial aid disbursements that were scheduled during the LOA cannot be made until the learner returns to school. A learner should check with the PGS business office to confirm any effect that may have on their payment plan.

If a learner is a veteran-military affiliated student utilizing VA education benefits, the learner must consult with the SNU VETS Center and speak with a Certification Official to determine if any change in status will impact the VA education benefit currently being used by the student.

Examples of reasons for a Qualified Leave of Absence

1. Illness of the learner or a family member
2. Death of a family member
3. Extended business travel
4. Approved waiver for a program class
5. Class breaks for more than 45 days if a student is using a program of study to complete missed or failed modules (including general education learners).
6. Short-term military deployments.

This list is only for example purposes. A learner who has one of the above circumstances is not automatically approved for a Leave of Absence, nor is a learner who has a circumstance which is not on the list automatically denied.

For a leave of absence to be considered a qualified leave of absence (in addition to the qualifications stated earlier on the form):

1. All requests must be submitted on a leave of absence form and include the reason for the learner's request
2. The learner must be enrolled and attending classes at the time a leave of absence is requested
3. There must be reasonable expectation the learner will return from the leave of absence to continue his or her education
4. The institution may not assess the learner any additional institutional charges, the learner's financial aid may not increase, and the learner is not eligible for any additional federal or state aid financial assistance

III. Additional Matters

- A. Student agrees to contact [INSERT APPROPRIATE PERSONNEL] _____ [days/weeks/months] in advance of Student's return to the University to ensure a smooth transition back to school.
- B. Student will not be required to pay any application or readmission fees related to Student's readmission to the institution.

The University and Student do hereby agree to the above.

[INSERT NAME], Student

Date

[INSERT NAME], [INSERT POSITION TITLE]
Southern Nazarene University

Date