



MASSACHUSETTS COLLEGE *of* PHARMACY
and HEALTH SCIENCES

MCPHS PREGNANCY AND RELATED CONDITIONS AND PARENTING STUDENT POLICY

Pursuant to the Requirements of the 2024 Title IX Regulation

Office of Inclusion

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MCPHS PREGNANCY AND RELATED CONDITIONS AND PARENTING STUDENT POLICY

The Massachusetts College of Pharmacy and Health Sciences (MCPHS) does not discriminate in its education program or activity against any applicant for admission, student, applicant for employment, or employee on the basis of current, potential, or past pregnancy or related conditions as mandated by Title IX of the Education Amendments of 1972 (Title IX). MCPHS also prohibits members of the MCPHS community from adopting or implementing any policy, practice, or procedure that treats an applicant for admission, student, applicant for employment, or employee differently on the basis of current, potential, or past parental, family, or marital status as mandated by Title IX.

Read the [MCPHS Notice of Nondiscrimination Statement](#).

1. Definitions

- ***Familial Status.*** The configuration of one’s family or one’s role in a family.
- ***Marital Status.*** The state of being married or unmarried.
- ***Parental Status.*** The status of a person who, with respect to another person who is under the age of 18,¹ is a biological, adoptive, foster, or 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.
- ***Pregnancy and Related Conditions.*** The full spectrum of processes and events connected with pregnancy, including pregnancy, childbirth, termination of pregnancy, or lactation; related medical conditions; and recovery therefrom.²
- ***Reasonable Modifications.*** Individualized modifications to MCPHS’ policies, practices, or procedures that do not fundamentally alter MCPHS’ education program or activity.

2. Information Sharing Requirements

When a student, or a person who has a legal right to act on behalf of the student, informs any employee of the student’s pregnancy or related conditions, the employee is required to provide the student with the Title IX Coordinator’s contact information and communicate that the coordinator can help take specific actions to prevent discrimination and ensure equal access to

¹ Or a person who is 18 or older but who is incapable of self-care because of a mental or physical disability.

² “The Department interprets ‘termination of pregnancy’ to mean the end of pregnancy in any manner, including, miscarriage, stillbirth, or abortion.” Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, 89 F.R. 33474, April 29, 2024, codified at 34 C.F.R. 106.

MCPHS's education program and activity. If the employee has a reasonable belief that the Title IX Coordinator has been notified of the pregnancy or related condition, the employee is not required to take these steps.

Upon notification of a student's pregnancy or related condition, the Title IX Coordinator will contact the student and inform the student of MCPHS' obligations to:

- Prohibit sex discrimination.
- Provide reasonable modifications.
- Allow access, on a voluntary basis, to any separate and comparable portion of the institution's education program or activity.
- Allow a voluntary leave of absence.
- Ensure appropriate lactation space availability.
- Treat pregnancy as comparable to other temporary medical conditions for medical benefit, service, plan, or policy purposes.

The Title IX Coordinator will also notify the student of the [process to file a complaint](#) for alleged discrimination, harassment, or retaliation.

3. Reasonable Modifications for Students

Students who are pregnant or are experiencing related conditions are entitled to Reasonable Modifications to prevent sex discrimination and ensure equal access to MCPHS' education program and activity. Any student seeking Reasonable Modifications must contact the Title IX Coordinator to discuss appropriate and available Reasonable Modifications based on their individual needs. Students are encouraged to request Reasonable Modifications as promptly as possible, although retroactive modifications may be available in some circumstances. Reasonable Modifications are voluntary, and a student can accept or decline the offered Reasonable Modifications. Not all Reasonable Modifications are appropriate for all contexts.

Reasonable Modifications may include:

- Breaks during class to express breast milk, breastfeed, or attend to health needs associated with pregnancy or related conditions, including eating, drinking, or using the restroom
- Intermittent absences to attend medical appointments
- Access to online or homebound education
- Changes in schedule or course sequence
- Time extensions for coursework and rescheduling of tests and examinations
- Allowing a student to sit or stand, or carry or keep water nearby
- Counseling
- Changes in physical space or supplies (for example, access to a larger desk or a footrest)
- Elevator access
- A larger uniform or other required clothing or equipment

- Other appropriate adjustments to policies, practices, or procedures determined by the Title IX Coordinator

In situations such as clinical rotations, performances, labs, and group work, MCPHS 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 may be 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 the Title IX Coordinator, their faculty members, and MCPHS' support systems 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 Title IX Coordinator will assist with plan development and implementation as needed.

Supporting documentation for Reasonable Modifications will only be required when it is necessary and reasonable to determine which Reasonable Modifications to offer or to determine whether to take additional specific actions.

Information about pregnant students' requests for modifications will be shared with faculty and staff only to the extent necessary to provide the Reasonable Modification.

MCPHS will treat pregnancy or related conditions in the same manner and under the same policies as any other temporary medical conditions with respect to any medical or hospital 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. For example, students experiencing pregnancy-related conditions that manifest as a temporary disability under the Americans with Disabilities Act (ADA) or Section 504 of the Rehabilitation Act are eligible for reasonable accommodations just like any other student with a temporary disability. The Title IX Coordinator will consult with disability staff to ensure the student receives reasonable accommodations for their disability as required by law.

4. Certification to Participate

A student may not be required to provide health care provider or other certification that the student is physically able to participate in the program or activity, unless:

1. The certified level of physical ability or health is necessary for participation;
2. The institution requires such certification of all students participating; and
3. The information obtained is not used as a basis for pregnancy-related discrimination.

5. Lactation Space Access

The Recipient provides students and employees with access to lactation spaces that are functional, appropriate, and safe. Such spaces are regularly cleaned, shielded from view, and

free from the intrusion of others.

6. Leaves of Absence

Students are permitted to take a voluntary leave of absence for a reasonable time as deemed medically necessary by their healthcare provider 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. While registered under that status, students who choose to take a leave of absence under this policy can elect to keep their health insurance coverage and continue residing in Recipient housing, subject to the payment of applicable fees.

To the extent possible, MCPHS will take reasonable steps to ensure that students who take a leave of absence or medical leave return to the same academic progress they were in when they took leave, including access to the same or an equivalent course catalog that was in place when the leave began.

Continuation of students' scholarships, fellowships, or similar MCPHS-sponsored funding during the leave term will depend on student registration status and the policies of the funding program regarding registration status. Students should contact the Title IX Coordinator and the Office of Financial Aid to discuss matters relating to any financial aid and MCPHS-sponsored funding.

To initiate a leave of absence, the student must contact the Title IX Coordinator at least 30 calendar days before the initiation of leave or as soon as practicable.

7. Policy Dissemination and Training

A copy of this policy will be available to faculty and employees during the annually required training and posted on the MCPHS website. MCPHS will alert all new students about this policy and its location as part of orientation. The Office of Inclusion will make educational materials available to all members of the MCPHS community to promote compliance with this policy and familiarity with its procedures.

**Employees should reference the [Employee Handbook](#) for provisions under Title IX and other applicable laws prohibiting different treatment based on sex, including in connection with parental, family, or marital status and pregnancy or related conditions. Employees may also contact Human Resources at HR@mcphs.edu for additional information. Please contact Human Resources at Benefits@mcphs.edu for additional information [for applicable leaves](#).*