



PREGNANCY MODIFICATIONS POLICY

Effective Date: August 1, 2024; Revision Date: September 21, 2024

I. Policy Statement

Dorsey College and Dorsey School of Beauty (the “Institutions” or “Dorsey”, or separately the “Institution”) are committed to providing all students and employees with the opportunity to pursue and attain their individual goals as it relates to Dorsey’s admissions, employment, and educational programs or activities. This commitment includes Dorsey’s students and employees who are pregnant, parenting, or experiencing pregnancy related conditions. Dorsey 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.

II. Definitions

“Pregnancy or related conditions” means:

- Pregnancy, childbirth, termination of pregnancy, or lactation;
- Medical conditions related to pregnancy, childbirth, termination of pregnancy, or lactation; or
- Recovery from pregnancy, childbirth, termination of pregnancy, lactation, or related medical conditions.

“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.

III. Student Pregnancy Disclosure

A student who is, or becomes, pregnant or has a related condition is strongly encouraged to notify the Dorsey’s Title IX Coordinator or their campus Managing Director as soon as possible. By doing so, the student and the Institution can collaborate and develop an appropriate plan for the continuation of the student’s education in light of the unique nature of Dorsey’s programs and requirements, as well as particular challenges the student may face while pregnant or while experiencing a pregnancy related condition.

If a Dorsey 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’s contact information for further assistance, unless the employee reasonably believes the Title IX Coordinator has already been notified.

The employee will also inform the student or the student’s representative that the Title IX Coordinator can coordinate specific actions to prevent sex discrimination and ensure the student’s equal access to Dorsey’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 Dorsey. Contact information for Dorsey's Title IX Coordinator is as follows:

Title IX Coordinator. Ann Victoria Thomas, 31799 John R Road, Madison Heights, MI 48071, Ph: 248.585.9200, ext. 11228, athomas@Dorsey.edu

After being notified by a student or the student's representative of the student's pregnancy or related condition, the Title IX Coordinator, in conjunction with the Managing Director, will do the following:

- Inform the student about Dorsey's prohibition on sex discrimination, including sex-based harassment.
- Provide the student with the option of reasonable modifications due to the student's pregnancy or related conditions.
- Allow the student voluntary access to any available separate and comparable portion of Dorsey's education programs or activities.
- 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.

Dorsey will not require students to submit supporting documentation for the above items, unless the documentation is necessary and reasonable for Dorsey 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 Dorsey 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, Dorsey 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 Dorsey'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;
- Dorsey 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 Dorsey, 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 Dorsey's education programs and activities due to the pregnancy or related condition, the student should contact the campus Managing Director 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 Dorsey representative.
- Dorsey will also allow a student to voluntarily access any separate and comparable portion of Dorsey's education program or activity.
- If a student is enrolled in the Associate of Applied Science in Radiologic Technology program or the Associate of Applied Science in Surgical Technology, Addendum B discusses education plan modifications and must be signed by the student and a Dorsey representative.

Withdraw from Dorsey

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

V. Reasonable Modifications for Students

Dorsey will treat pregnancy or related conditions, or temporary disability resulting from pregnancy or related conditions, consistent with Dorsey's current policies.

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; however, a modification is not reasonable if it fundamentally alters the nature of Dorsey'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
- Excused absences to attend medical appointments
- Schedule or course changes
- Test rescheduling
- Time extensions for coursework
- Counseling
- Physical space or supply changes
- Elevator access

- Other appropriate policy, practice, or procedure modifications

Students may accept or decline each reasonable modification offered by Dorsey.

VI. Reasonable Modifications for Employees

Dorsey will treat employee pregnancy or related conditions as any other temporary medical condition for all job-related purposes and will provide accommodations as appropriate. Dorsey will further adhere to its leave policies for employee pregnancy or related conditions.

VII. Lactation Stations & Information

Dorsey provides lactation stations at each campus for breastfeeding students and employees. The campus Managing Director can direct students to the lactation station applicable to their campus. These spaces provide a private, clean area where students and employees are shielded from view and free from intrusion.

Dorsey will also allow reasonable break time for employees to express breast milk or breastfeed as needed.

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 using the contact information listed in Section III of this policy. Employees with questions about the policy or concerns about its implementation should contact HR at:

Director of Human Resources. Wanda Bjeijy, 31799 John R Road, Madison Heights, MI 48071, Ph: 248.585.9200, ext. 11326, wbeijy@Dorsey.edu



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 Dorsey College or Dorsey School of Beauty (“Dorsey”) and intends to continue pursuing their education in Dorsey’s [INSERT PROGRAM].
- Student understands there are potential risks to them and/or their fetus by continuing in the [INSERT PROGRAM]. Dorsey 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]

Modification accepted by student Modification declined by student

B. [insert modification]

Modification accepted by student Modification declined by student

Student may request additional modifications at any time by contacting the campus Managing Director or the Title IX Coordinator.

Dorsey and Student do hereby agree to the above.

[INSERT NAME], Student

Date

[INSERT NAME], [INSERT POSITION TITLE]
Dorsey College / Dorsey School of Beauty

Date



ADDENDUM B

Associate of Applied Science in Radiologic Technology Associate of Applied Science in Surgical Technology

Dorsey College (the “College”) and [INSERT NAME OF STUDENT] (“Student”) have agreed to the following conditions as detailed below.

Consistent with students in all programs, students who become pregnant while in the Dorsey College Radiography program have the option to voluntarily “declare” their pregnancy at any time. If a student chooses to declare the pregnancy, the following steps must be followed:

- Submit in writing, proof of pregnancy by a physician with the anticipated due date to the Dorsey College Program Director.
- Submit a release of responsibility statement from the physician/health care provider to the Dorsey College Program Director.

I. Program Continuation

In order to continue in lecture, clinical, and lab once a pregnancy is declared, the student will have two options:

1. CONTINUE IN PROGRAM. Students need to successfully complete all didactic and clinical components of the program without restrictions or special conditions, being careful not to exceed the 0.5 rem exposure. If the student’s fetal badge reaches the 0.5 rem exposure, the student will be required to be removed from clinical and may be required to withdraw and reenter into the program to complete the remaining clinical and didactic course work. The student will:
 - a. Be considered in the category of a “declared pregnant worker” and will be required to read and follow the [US Nuclear Regulatory Guide 8.13](#) entitled “Instructions concerning Prenatal Radiation Exposure.” Consultation with program officials would also include methods to reduce radiation exposure during procedures (time, distance & shielding) and an opportunity for the student to ask questions.
 - b. Be issued a fetal monitoring device which would be worn at the level of the abdomen and worn throughout the entire gestation period while in clinical. The radiation to the fetus must not exceed 0.5 rems of radiation. The student is responsible for returning the monitoring devices promptly. A record of badge readings for the gestation will be kept.
 - c. If the declaration of pregnancy is withdrawn, the pregnancy will no longer be recognized.

- d. In the absence of a voluntary declaration of pregnancy, a student will not be considered pregnant
- e. Certain aspects of the Dorsey College radiography curriculum may be potentially hazardous to the embryo or fetus. It is the student's responsibility to understand the possible harmful effects.
- f. It is recommended that declaration of pregnancy be done as soon as possible. The embryo or fetus is most sensitive to radiation during the first three months of pregnancy.
- g. Students are advised to consider the physical requirements of the program if a change in health status would limit their ability to meet program requirements.
- h. While in clinical, as always, the student, should observe and follow the basic rules of radiation safety; reducing the time spent in a radiation area, increasing the distance from the source of radiation, and shielding.

2. WITHDRAW AND RE-ENTER. Students may request to withdraw from the program. Requests for withdraw must be made in writing to the Program Director. Specific questions should be brought to the program faculty.

II. Additional Matters

A student that has declared a pregnancy has the right to withdraw the declaration of pregnancy at any time by submitting the request to withdraw the pregnancy declaration, in writing, to the Program Director.

Student agrees to contact [INSERT APPROPRIATE PERSONNEL] ____ [days/weeks/months] in advance of Student's return to the Dorsey College in order to ensure a smooth transition back to school.

III. Pregnancy Declaration

It is my understanding that this declaration is entirely voluntary. Further, it is my intent to declare that I am pregnant and understand that, according to the National Council on Radiation Protection and Measurements (NCRP), the recommended maximum permissible dose to the fetus from occupational exposure of the expectant mother should not exceed 500 mREM during the entire gestation period and/or 50 mREM per month. Also, I understand and agree to adhere to the program pregnancy policy. Further, I understand that, according to the NCRP, I may "undeclare" (in writing to the Program Director/Radiation Safety Officer) my pregnancy at any time during the pregnancy. Undeclared status will revert to normal exposure limits. The following signatures will serve as documentation that I have voluntarily met with the Program Director (Radiation Safety Officer) and Clinical Coordinator and have reviewed the program pregnancy policy including dose limitations and radiation protection.

Student Signature _____ Date _____

Student (Printed Name) _____ Anticipated due date: _____

Program Director _____ Date _____

Clinical Coordinator _____ Date _____