

# Institutional Compliance & Student Rights Report: Federal Compliance Guardrails for Title IX and ADA/504 at TCI

## Executive Summary

At Transitions Career Institute, our mission is to provide high-quality, accessible vocational training. To protect our students and our federal standing, we utilize two primary "guardrails": the **Title IX Coordinator** and the **Disability Services (ADA/504) Officer**. These roles ensure that gender-based equity and disability access are balanced with the rigorous clinical safety and "Essential Functions" required for licensure by the New York Boards of Regents.

## I. Title IX Coordinator: The Equity Officer

**Legal Basis:** Title IX of the Education Amendments of 1972 (Updated August 2024).

**TCI Context:** Prohibits sex-based discrimination, including harassment, sexual orientation, gender identity, and pregnancy.

### Our Commitments:

- **Pregnancy & Lactation Mandates:** Under the 2024 Final Rule, we provide "Reasonable Adjustments" for pregnancy and related conditions (e.g., recovery from childbirth or miscarriage). This includes excused absences for prenatal care and providing a **private, non-bathroom space** for lactation at our campus.
- **Clinical Site Misconduct:** TCI is responsible for students' safety even off-campus. Our Title-IX Coordinator will ensure that any harassment reported at a clinical site (hospitals or long-term care facilities) is investigated and addressed via supportive measures.
- **Supportive Measures:** Implementation of non-disciplinary services—such as counseling or clinical schedule changes—to ensure a student's education is not interrupted during an investigation.

## II. Disability Services (ADA/504) Officer: The Access Provider

**Legal Basis:** Section 504 of the Rehab Act & the Americans with Disabilities Act.

**TCI Context:** Ensures students with documented disabilities have an equal opportunity to succeed in the 1300-clock-hour LPN curriculum and on the NCLEX-PN.

### Our commitment

- **The Interactive Process:** Federal law requires a "Good-Faith Interactive Dialogue." Our coordinator doesn't just "grant" requests; they collaborate with the students and faculty to find effective, reasonable accommodation.
- **Essential Functions & Clinical Safety:** As an LPN program, we cannot grant accommodation that "fundamentally alter" the nature of nursing care or compromise patient safety. Every student must still be able to meet TCI's technical standards (e.g., medication calculation, sterile technique, and physical mobility).
- **Testing Accommodations:** Managing requests for extra time on high-stakes exams (TEAS, HESI, or ATI proctored assessments) and ensuring faculty do not have access to the student's private medical diagnosis, per **FERPA**.

### III. TCI Compliance Roles: Quick Reference

Feature	Title IX Compliance	Disability (ADA) Compliance
<b>Primary Goal</b>	Equity & Safety (Gender/Sex)	Access & Inclusion (Disability)
<b>Key Legislation</b>	2024 Title IX Final Rule	ADA / Section 504
<b>Common Request</b>	Lactation breaks or maternity leave	Extra testing time; ergonomic tools
<b>Clinical Focus</b>	Protection from site-based harassment	Ability to perform "Essential Functions"
<b>Documentation</b>	Incident reports / Medical notes	Professional diagnostic evaluations

### IV. Faculty "Action Triggers" for Transitions Career Institute

TCI will train all new instructors to recognize when a student's need falls into a "Compliance Guardrail."

Scenario	Action
Student states: "I'm pregnant and my doctor says I can't be around chemo drugs."	Refer to Title IX & Disability Coordinator
Student states: "I have ADHD and need a quiet room for my Med-Calc exam."	Refer to Title IX & Disability Coordinator
Student states: "I feel uncomfortable with how a staff nurse at clinical is treating me."	Refer to Title IX & Disability Coordinator
Student states: "I have a back injury and can't perform the 50lb lift in lab."	Refer to Title IX & Disability Coordinator

## V. Risk Management

To safeguard Transitions Career Institute's accreditation and Title IV eligibility:

1. **Separation of Duties:** TCI maintains a separation between the *Investigator* of a claim and the *Decision-Maker* to prevent institutional bias.
2. **Clinical MOUs:** All our clinical placement contracts will include a clause confirming the facility's compliance with TCI's non-discrimination and disability access policies.
3. **Orientation:** A 15-minute meet-and-greet with the officer is now a mandatory part of the Faculty Orientation Checklist at TCI.