

**POLICIES
&
GUIDELINES**

2019/2020

STUDIO INCAMMINATI
SCHOOL FOR CONTEMPORARY REALIST ART

STUDIO INCAMMINATI

POLICIES & GUIDELINES

2019/2020

Welcome to Studio Incamminati! In order to uphold a positive learning experience and maintain a clean, safe studio environment, the following guidelines and policies have been developed. Please don't hesitate to speak with the office personnel or contact me directly if you should need more information about our guidelines. With your cooperation, Studio Incamminati can continue to provide a professional, respectful and productive studio atmosphere.

Thank you,

A handwritten signature in black ink, appearing to read 'Dan Thompson', with a stylized flourish at the end.

Dan Thompson
Dean of Faculty & Student

POLICIES & GUIDELINES

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I. GENERAL STUDIO POLICIES

1. Non-Discrimination

Studio Incamminati's purpose is to train exceptionally talented artists to call upon their ability to create highly meaningful art. Accordingly, acceptance into Studio Incamminati's programs is entirely merit-based. Studio Incamminati does not discriminate on the basis of race, color, gender, religion, sexual orientation, national or ethnic origin, age, disability, or veteran status in any program or activity or in employment.

2. Harassment/Sexual Harassment

Because Studio Incamminati seeks to preserve a work and learning environment free from harassment/sexual harassment, it is the purpose of this policy to prohibit harassment and to identify the resources available to concerned individuals.

Sexual abuse takes the form of inappropriate sexual contact or interaction for the gratification of the actor who is functioning as a caregiver and is responsible for the student's or child's care. Sexual abuse includes sexual assault, exploitation, molestation or injury. It does not include sexual harassment, which is another form of behavior, which is prohibited at Studio Incamminati.

The policies on abuse and molestation, harassment, sexual harassment, discrimination, sexual violence, and social media is located in Section III. 6 and 7 of this policy manual.

3. Substance Abuse Policies

For substance abuse policies, refer to the latest Drug and Alcohol Prevention Handbook.

4. Studio Visitors

Prior authorization from the office personnel is required for guests to be permitted into the studio. Studio guests must be escorted by a student at all times.

5. Noise Pollution

Cell phones must be placed on vibrate or turned off during studio hours. Phone conversations should be conducted outside the studio.

Stereos and other audio equipment are not permitted without full consent from the Instructor and other members of the studio floor.

6. Photography

In general, all photography and filming must be conducted without disrupting operations or limiting accessibility to exhibitions, stairwells,

entrances/exits, high traffic areas and other locations of interest to guests.

For Visitors: Still photography is permitted for private, non-commercial use only. Photographs cannot be published, sold, reproduced, transferred, distributed, or otherwise commercially exploited in any manner whatsoever. Video and voice recordings of any nature are prohibited. Studio Incamminati reserves the right, in its sole discretion, to withhold permission to photograph on its premises.

For Press: Members of the press and media may photograph within designated areas of the facility in order to promote the mission and purpose of, or report on newsworthy events involving Studio Incamminati. All members of the press and media must contact the Communications Manager prior to arrival. A member of the Studio Incamminati staff must be present to escort members of the press and media through exhibitions and all other areas of the facility. Make arrangements with the Communications Manager at least 24 hours in advance to ensure availability. Incamminati reserves the right to approve final content for anything in which images of Studio Incamminati, its staff or students, or their artwork will appear. Courtesy copy of all final content shall be provided to Studio Incamminati for its use for internal and promotional purposes.

For Commercial Purposes: Commercial and special filming and photography arrangements are determined on case-by-case basis, and requests must be submitted at least one week in advance through the Communications Manager. Fees and charges may apply and vary for each arrangement; all are the sole discretion of Studio Incamminati. Studio Incamminati reserves the right to approve final content for anything in which images of Studio Incamminati, its staff or students, or their artwork will appear. Courtesy copy of all final content shall be provided to Studio Incamminati for its use for internal and promotional purposes.

7. Smoking

Smoking is not permitted in Studio Incamminati or in the Wolf Building. Violators are subject to a \$100 fine.

8. Absences/Probation/Dismissal

Studio Incamminati reserves the right to require the withdrawal of any student whose educational development is unsatisfactory or whose conduct is deemed harmful to the Studio by the administration.

Students are required to be present at least 90% of their approved schedule. Students who do not meet these attendance requirements will receive written notification from the administration. If poor attendance continues, students will be asked to repeat classes, or a full year of the

program, or be dismissed from Studio Incamminati. Students who are dismissed from the Full-time or Part-time Advanced Fine Art Program for unsatisfactory progress must reapply to re-enter the program. Student lateness will be recorded and prorated as absences.

9. Billing/Refunds

Payment is due 30 days before the first-class day of each semester. Payment may be made by Visa, MasterCard, American Express, Discover, check, or money order. A one-time new student registration deposit of \$500 is due upon acceptance in the Advanced Fine Art Program. In addition, an Installment Payment Plan is available for all Advanced Fine Art Program students in good standing beginning with the second semester of the first year. For information on the plan, call 215-592-7910 or visit studioincamminati.org/programs/financial-aid. Students who withdraw prior to the start of classes will receive a full refund if received within five calendar days of signing the enrollment agreement.

Students who withdraw after the five calendar days following the date of signing the enrollment agreement, but prior to the beginning of classes, will receive a full refund except the non-refundable \$25 application fee.

Students who withdraw during the first seven calendar days of the semester will receive a 75% refund of the tuition for the semester. Students who withdraw after the first seven calendar days, but within the first 25% of the semester, will receive a 55% refund of the tuition for semester. Students who withdraw after 25% but within 50% of the semester will receive a 30% refund of the tuition. Students who withdraw after 50% of the semester will receive no refund.

Students who withdraw without official notification the withdrawal date will be determined as the day of the last class attended. The date of withdrawal for a student who is on an approved Leave of Absence shall be the last date of attendance before the leave began.

Students enrolled in the payment plan are responsible for any outstanding tuition payments after withdrawing from the program.

Any individual who is entitled to educational assistance under chapter 31, Vocational Rehabilitation and Employment, or chapter 33 Post-9/11 GI Bill benefits can attend or participate in the course of education during the period beginning on the date on which the individual provides to the educational institution a certificate of eligibility for entitlement to education assistance under chapter 31 or 33 (a “certificate of eligibility” can also include a “Statement of Benefits” obtained from the Department of Veteran’s Affairs (VA) website e-Benefits, or a VAF 28-1905 form for chapter 31 authorization purposes) and ending on the earlier of the following dates:

1. The date on which payment from VA is made to the institution.

2. 90 days after the date the institution certified tuition and fees following the receipt of the certificate of eligibility.

Our institution can ensure that any individual under chapter 31 or 33 will not receive a penalty, including the assessment of late fees, the denial of access to classes, libraries or other institutional facilities, or the requirement that a covered individual borrow additional funds, on any covered individual because of the individual's inability to meet his or her financial obligation to Studio Incamminati due to the delayed disbursement funding from the VA.

10. Student Grievances

Studio Incamminati provides a dynamic teaching program to produce highly skilled artists who can call upon their abilities to create art with depth of purpose. Studio Incamminati strives to provide a nurturing and supportive environment where students can learn and grow together. In doing so, Studio Incamminati strives to provide the best experience possible and the highest level of service. In the event students have a serious complaint, the following procedures are available.

If it is a dispute involves curriculum, classroom management, instruction, or evaluations, it is best to resolve the issue with the individual teacher. If that does not resolve the issue, please see the Director of Educational Programming or Dean of Faculty and Students, and then the President.

If the concern pertains to financial aid or billing, please see the Administrative Services Manager and then the President in that order.

If the above procedure does not resolve the issue, students may address their grievance in writing to the Board of Directors, which meets six times per year. Grievances must be submitted to the President at least one month prior to the board meeting.

For sexual harassment issues, please see section I. 2, Sexual Harassment in this Policies & Guidelines.

In addition to the above procedures, the U.S. Department of Education requires institutions to provide enrolled and prospective students with contact information for filing complaints with its accrediting agency and with the appropriate state agency for handling complaints in the student's state. Many of the outside agencies will require that all institutional procedures be followed before the concern will be considered. Before contacting one of these agencies, Studio Incamminati encourages you to inform the administration of your complaint first.

Studio Incamminati is nationally accredited by the National Association of Schools of Art and Design (NASAD). For a copy of Studio Incamminati's accreditation status, please visit NASAD website at www.nasad.arts-accredit.org Questions or concerns that are not satisfactorily resolved by the persons designated above or by other school officials may be brought to

the attention of the State Board of Private Licensed Schools, Pennsylvania Department of Education, 333 Market Street, Harrisburg, Pennsylvania 17126-0333.

11. Student Evaluations

Students' progress through the Advanced Fine Art Program is determined by the mid and end of semester evaluations. The Mid Semester evaluations are done with students and their instructor. The End of Semester evaluations can be done as one-on-one or in a group critique format depending on the instructor preference. These evaluations and the student's body of artwork produced in class determine the retention and advancement status of students into the next level/year.

12. Grading/Satisfactory Academic Progress Policy/Withdrawals

A. Process Overview

Federal regulations require all schools participating in Federal Title IV, HEA Student Financial Aid programs to establish and apply reasonable standards for measuring Satisfactory Academic Progress. These standards are applicable to all students enrolled in the Advanced Fine Art Program and are used to measure their satisfactory progress toward graduation. The policy is provided to all students prior to the first-class session and is consistently applied to all students in the program, regardless of the student's participation in the Title IV programs. Evaluations are maintained in students' files.

New SAP definitions went into effect on July 1, 2011. Studio Incamminati developed policies to determine the academic standards that students must meet and constructed a means and a schedule of measuring acceptable Quantitative (Pace of Progress) and Qualitative (Grade Point Average) standards. The Quantitative measure ensures students are progressing through their program of study at a minimum Pace that will provide for completion of their program within 150% of the normal timeframe.

SAP standards are established by the faculty in consultation with the Director of Educational Programming or Dean of Faculty and Students, and in compliance with Accrediting agency standards and Federal Title IV regulations. Students must maintain SAP according to the following standards in order to continue enrollment. SAP is measured at the end of each payment period, and will be checked prior to disbursement of aid.

The policy for Title IV, HEA students is identical to the school standards for students enrolled in the same educational programs who are not receiving Title IV aid.

B. Evaluation Periods

Formal evaluations for SAP are conducted at the end of each Term (payment period) as follows:

Fall Semester - January

Spring Semester - June

Evaluations determine if students have met the minimum requirements for SAP. The frequency of evaluations ensures that students have continuous knowledge of their progress toward completion.

C. Academic Year Definition

For purposes of Federal financial aid, the academic year definition is a minimum of 24 credits and 37 weeks of instructional time.

D. Quantitative Measure (Pace of Progression) and Maximum Time Frame

Studio Incamminati's SAP policy contains a measure of Pace of Progression. Students must progress through the Advanced Fine Art Program at a sufficient pace to ensure completion within the maximum time frame of 150% of the published length of the program, as expressed in attempted credits.

The maximum time for students to complete the Advanced Fine Art Program is as follows:

Credit Hours in Program: 99 credits

Maximum Attempted Credit Hours: 148 credits

To be considered making SAP, students are required to earn a minimum of 67% of the credits attempted, cumulatively, at each evaluation point. This will ensure completion of the program within the 150% of the normal timeframe. Evaluations are conducted at the end of each payment period to determine if students have met the minimum requirements and are based on the cumulative credit completion percentage as of the last day of the evaluation period. The Pace of Progression is determined by dividing the cumulative credit hours earned/completed by the cumulative credit hours attempted. At the end of each evaluation period, the school determines if students have maintained at least 67% cumulative Pace of Progression since the beginning of the course. This indicates that, given the same Pace, the student will graduate within the maximum time frame allowed.

E. Qualitative Measure

The qualitative measure of progress is based on grade point average. Students must maintain a cumulative grade point average of at least 2.0 at the end of each evaluation point (semester). The Financial Aid Adviser and the Director of Educational Programming monitor qualitative progress.

GRADE	POINTS	DESCRIPTION
A	4.00	Superior: Mastery of subject matter
A-	3.70	

B+	3.30	Good: Above average of mastery of subject matter
B	3.00	
B-	2.70	
C+	2.30	Satisfactory: Acceptable mastery of subject matter
C	2.00	
C-	1.70	
D+	1.30	Low pass: Limited mastery of subject matter
D	1.00	
F	0.00	Failure: Deficiency in subject matter

F. Financial Aid Warning

Studio Incamminati evaluates SAP at the end of each semester (payment period). Students who fail to meet either the Quantitative and/or Qualitative measures of SAP are considered in a status of “Not Making SAP”. Students Not Making SAP will be put on Financial Aid Warning for one semester/payment period. Students who are put on a Financial Aid Warning continue to receive Title IV aid for one semester/payment period after they are placed on Financial Aid Warning status. The status will be conferred automatically without the student appealing the SAP status. Students will be notified in writing of their failure to meet SAP requirements and placement on FA Warning status,

G. Appeal Process

Students who do not make SAP at the end of the Financial Aid Warning period are considered “Not Making SAP” and lose their Title IV financial aid eligibility. These students will be placed on Academic Development Status and the right to appeal. Students may have the opportunity to have their Title IV, HEA financial aid eligibility reinstated by appealing the Not Making SAP/Academic Development Status, and being placed on Financial Aid Probation if the appeal is granted.

In order to appeal, students have three (3) business days after being notified to submit an appeal. The appeal must be in writing and given to the President, who will meet with the Financial Aid Academic Appeals Committee to make a decision on the appeal.

The basis on which a student may file an appeal are: injury or illness; death of a relative; or other special circumstance. Students must provide supporting documents and describe in writing any unusual circumstances that warrant special consideration. Students must provide information as to why they did not make SAP and what has changed that will allow them to make SAP by the next evaluation point.

The President will provide a decision in writing within five (5) business days.

H. Financial Aid Probation

If Probation Status is granted, students regain Title IV, HEA eligibility for the next eligible payment period only. Students must be making SAP at the end of the payment period to regain Title IV, HEA funding for the next payment period.

Students who regain SAP at the next evaluation period regain full eligibility for Title IV, HEA funding. Students not making SAP continue to be ineligible to receive Title IV funds without the option to appeal.

I. Reinstatement of Title IV, HEA Aid

Reinstatement of aid is limited to the period under evaluation. Students making SAP by the conclusion of the Financial Aid Warning or Financial Aid Probation period will be removed from said status and will regain eligibility for Title IV, HEA funding.

A former student requesting to be reinstated as an active student should do so in writing. Supportive documentation and/or information concerning any mitigating circumstances should be noted in the request. The requesting former student shall be notified of the Reinstatement Review within five (5) business days following the decision of the Financial Aid Academic Appeals Committee. A returning student always re-enters the program in the same SAP status as when the student left the program.

J. Course Incompletes, Withdrawals, Repetitions and Transfer Credits

Students who withdraw and re-enroll will return in the same SAP status as at the time of withdrawal. Course incompletes, repetitions and non-credit remedial courses do not apply. Therefore, the school does not issue incompletes or offer non-credit remedial courses. All hours attended are considered attempted. Students are not permitted to withdraw from individual subjects. Students withdrawing from school will receive credit for all work successfully completed up to the point of withdrawal.

Due to the unique nature of Studio Incamminati's curriculum, transfer credits are not accepted from other institutions.

Official Withdrawal from School

Students who withdraw from the school must consult with the President and/or Director of Educational Programming and notify in writing of his/ her official last day.

Unofficial Withdrawal from School

If Studio Incamminati unofficially withdraws a student from the school, the President and/or Director of Educational Programming will record the circumstances and last day in writing and include the information in the student's official file. A student who fails to attend classes for 14 consecutive calendar

days will be considered to have unofficially withdrawn from the institution.

13. Verification

Each year the U.S. Department of Education requires schools participating in the Title IV, Federal Student Aid programs to verify the consistency and accuracy of data submitted on the Free Application for Federal Student Aid (FAFSA). Any student who completes a FAFSA may be chosen for verification by the Department of Education. Nationwide, about 30% of all FAFSA applications are selected.

If selected, students (if Independent) and their parents (if Dependent) must supply documentation to confirm the data reported on the FAFSA form. Students must submit a required Verification Worksheet and copies of their (and their parents') federal income tax transcripts. In some instances, students will be required to provide proof of identification and graduation of High School (or the equivalent). If selected, the Financial Aid Administrator will notify the student and provide a copy of the institution's detailed Verification Policies and Procedures. No federal financial aid may be credited to the student's account until this process is completed.

This policy applies to students who will receive subsidized student financial assistance such as Pell Grant and Subsidized Student Loans. Students may be selected for verification by the Department of Education or Studio Incamminati if there is an error made on their FAFSA or the school requires more information. Students who are eligible for both subsidized and unsubsidized Title IV aid may not avoid verification by accepting only unsubsidized aid.

A. Notifications

Students who are selected for verification by the U. S. Department of Education they will be notified on their Student Aid Report (SAR) in the comments section explaining what documentation is required. If selected for verification by the Financial Aid Adviser (FAA) at Studio Incamminati, the school will contact the student via phone or email asking them to provide any reasonable documentation in accordance with any consistently applied school policies.

B. Submitting Verification Documentation

Students must submit the required verification documentation for subsidized financial aid, including Pell Grants and Federal Direct Subsidized Loans, by September 3, 2019 or 120 days from the last day of student's enrollment, whichever is first. For Federal Direct Unsubsidized Loans, students are required to submit all documentation by the last day of the Spring semester on June 12, 2020. If a student does not submit the required verification documentation within the aforementioned time period, the school cannot originate or disburse any Federal Direct Subsidized Loans, and they forfeit their Pell Grant

for that award year and must return any Pell money already received that year.

To submit the verification documents any student who has an FSA ID- regardless of how he/she originally applied-may correct any of their own data by using FAFSA on the Web at www.fafsa.gov. If dependent students need to change parental data, a parent must either sign electronically with his/ her own FSA ID or print out and sign a signature page. If Studio Incamminati sends the correction or update for a student, the school must first have signed documentation from the student and parent. The documentation can be signatures on Part 2 of the SAR, a signed copy of the correction, or update, or a signed verification document. Unlike those for the original application, these do not have to be wet signatures. Central Processing System (CPS) will process the change, send notice to the school, and send the student a one-page SAR acknowledgement or, if the CPS has her/his e-mail address, an e-mail with a link to her/his SAR information on the Web.

Once the required verification documentation has been submitted, the U.S. Department of Education and Studio Incamminati will review the submitted information. If a student's Estimated Family Contribution is adjusted and the amount of Title IV Federal Student Aid award changes, the FAA will call and email the student within three (3) business days to set up an in-person appointment to discuss the student's financial aid award.

C. Fraud

If fraud or abuse is detected or suspected it must be reported to Randi Cromer, FAA at Studio Incamminati. The FAA will refer information for investigation to the Office of Inspector General at the Department of Education. All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided to the Department. Fraud is intent to deceive as opposed to a mistake. In addition, Studio Incamminati will refer any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the FSA Programs.

OIG Address and Phone Numbers

Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, SW Washington, DC 20202-1510
1-800-MIS-USED
Email: oig.hotline@ed.gov
Web: <http://www.ed.gov/about/offices/list/oig/hotline.html>

Regional Offices Telephone No. National Hotline

Inspector General's Hotline — Philadelphia, PA (215) 656-6900

OIG referrals

34 CFR 668.16(g) — IRS Publication 17

14. Awarding of Title IV, HEA Programs

Students cannot be in default on any previous student loans and/or does not owe a refund on a grant from another school in order to receive any new awards. The student's total financial aid must not exceed the student's financial need (Need = Cost of Attendance minus the EFC).

A. Pell Grant

A Pell Grant is considered to be the first source of Federal Student Aid and begins with Pell eligibility. A student must be enrolled in Studio Incamminati's Advanced Fine Arts Program to receive a Pell Grant, and any student who has earned a Bachelor's Degree is not considered an undergraduate and cannot receive a Pell grant.

The amount of a Pell Grant the student will be awarded is determined by the student's EFC from their FAFSA, and the Cost of Attendance at an institution. The Pell Grant maximum award for the 2019-2020 Award year is \$6,195.

B. Direct Stafford Student Loan

These loans may be obtained through the Federal Government, called Direct Student Loans; or they may be obtained through Banks which are called FFEL. There are two kinds of Direct Stafford Student Loans:

1. Direct Subsidized Stafford Loan: A dependent or independent student may borrow up to \$3500 as a freshman and \$4500 as a sophomore provided the student has need. here is no interest while the student is in school. Interest and repayment begins 6 months after graduation or withdrawal from school.
2. Direct Unsubsidized Stafford Loan: An independent student may borrow up to \$6000 during each of the first two years of study under this program. The interest rate begins immediately and can be paid quarterly, or it can be capitalized and paid with principal after the student leaves school. The unsubsidized loan is not need based and can replace the EFC; however, the total of all financial aid cannot exceed the Cost of Attendance.

C. Counseling

Each student receiving a Direct Loan at Studio Incamminati must complete an Entrance Interview. Students can complete this interview at studentloans.gov or you can ask your FAA, Randi Cromer, for the document. When you leave the school, either by withdrawal or graduation, you must complete Exit Counseling on the same site for your student loans.

15. Policy on Return of Title IV Funds

When A Student Withdraws When students apply for financial aid, a statement is signed that the funds will be used for educational purposes only. Therefore, if students withdraw before completing the program, a

portion of the funds received may have to be returned. Studio Incamminati will calculate the amount of funding to be returned to the Title IV HEA Federal fund programs according to the policies below:

A. Return to Title IV Funds Policy

This policy applies to students who withdraw officially, unofficially or fail to return from a leave of absence or are dismissed from enrollment. It is separate and distinct from Studio Incamminati's Refund Policy.

The calculated amount of the Return of title IV, HEA funds that are required to be returned for the students affected by the policy, are determined according to the following definitions and procedures as prescribed by the regulations.

The amount of title IV, HEA earned is based on the amount of time a student spent in academic attendance, and the total aid received; it has no relationship to the student's incurred institutional charges. Because these requirements deal only with Title IV HEA funds, the order of return of unearned funds does not include funds from sources other than the title IV, HEA programs.

Title IV, HEA funds are awarded to students under the assumption that he/she will attend school for the entire period for which the aid is awarded. Students who withdrawal may no longer be eligible for the full amount of Title IV, HEA funds that were originally scheduled. Therefore, the amount of Federal funds earned must be determined. If the amount disbursed is greater than the amount earned, unearned funds must be returned.

The Payment period for a term-based credit hour program is one half the academic year and one half the credits.

Students who do not complete all the days in the payment period or period of enrollment that the student was scheduled to complete are considered to be withdrawn. Students who ceases attendance (drops or withdraws) from all his or her title IV eligible courses in a payment period or period of enrollment are also considered to be withdrawn.

Date of Determination that the Student Withdrew

The Date of Determination is the date of the institution's determination that the student withdrew varies depending on the type of withdrawal. Students who officially withdrawal or provide official notification of their intent to withdraw, the date of the institution's determination that the student withdrew would be the date the student began the official withdrawal process or the date of the student's notification, whichever is later. Students who do not begin the official withdrawal process or provide notification of his/her intent to withdraw, the date of the institution's determination that the student withdrew would be the date the school becomes aware that the student ceased attendance. Studio Incamminati does take attendance and so

the last date of attendance will always be used when calculating Return to Title IV. Studio Incamminati has 45 days from the date that the institution determines that the student withdrew to return all unearned funds for which it is responsible. The school is required to offer a post withdrawal disbursement that is not credited to the student's account within 30 days of the date of determination.

The Date of Determination that the student withdrew is a maximum 14 days after the last date of attendance. The Date of Determination starts the clock for timely refunds of Title IV Programs. Funds must be returned within 45 days after the Date of Determination. All dates are based on required official Studio Incamminati attendance records.

Studio Incamminati's Office is required by federal statute to calculate the percentage of earned Title IV Funds received or pending and to return the unearned funds for students who withdrew, were terminated or failed to return from an approved leave of absence. For students who fail to return from a

Leave of Absence, the Date of Withdrawal is the last day the student attended class before the Leave began. Therefore, for students enrolled in credit hour term programs for a LOA to be an official LOA a school must allow a student returning from a LOA to complete the coursework that he or she began prior to the LOA. In addition, the institution may not impose additional charges and may not award the student additional Title IV assistance.

Payment Period:

For a student in an eligible program in semesters, and measures progress in credit hours, the payment period is the semester.

Rounding:

Enter dollars and cents using standard rounding rules to round to the nearest penny. Final payment amounts that the school and student are each responsible for returning may be rounded to the nearest dollar.

Percentages are calculated to four decimal places and rounded to three decimal places.

Students who reenter within 180 days of their withdrawal are immediately eligible to receive all Title IV funds that were returned when they ceased attendance.

“Official” Voluntary Withdrawal

Students are considered to be “Officially” withdrawn on the date he/she notifies the Financial Aid Adviser or Director of Educational Programming in writing of their intent to withdraw. The date of the termination for return and refund purposes will be the earliest of the following for official withdrawals:

1. Date student provided official notification of intent to withdraw in writing.

2. Date student began the withdrawal from the school's records. Students will be permitted to rescind his/her notification in writing and continue the program if so chosen. However, students who subsequently drop, the withdrawal date is the original date of notification of intent to withdraw.

Upon receipt of the withdrawal information the Studio Incamminati will complete the following:

1. Determine the student's last date of attendance as of the last recorded date of academic attendance on the school's attendance record, and
2. Perform two calculations
 - a. The student's ledger card and attendance record are reviewed to determine the calculation of Return of Title IV, HEA funds the student has earned, and if any, the amount of Title IV, HEA funds for which the school is responsible. Returns made to the Federal Funds Account are calculated using the Department's Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.
 - b. Calculate the school's refund requirement (see school refund calculation).
3. Student's grade record will be updated to reflect his/her final grade.
4. Studio Incamminati will return the amount for any unearned portion of the Title IV, HEA funds for which the school is responsible within 45 days of the date the official notice was provided.
5. If applicable, Studio Incamminati will provide students with a letter explaining the Title IV, HEA requirements. To include:
 - a. The amount of Title IV, HEA assistance the student has earned. This amount is based upon the length of time the student was enrolled in the program based on scheduled attendance and the amount of funds the student received.
 - b. Any returns that will be made to the Federal program on the student's behalf as a result of exiting the program. If a student's scheduled attendance is more than 60% of the payment period, he/she is considered to have earned 100% of the Federal funds received for the payment period. In this case, no funds need to be returned to the Federal funds.
 - c. Advise the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.

6. Supply the student with ledger card record noting outstanding balance due to the school and the available methods of payment. A copy of the completed worksheet, check, letter and final ledger card will be kept in the student's file.

Students who decide to rescind his/her official notification to withdraw must provide a signed and dated written statement indicating he/she is continuing his or her program of study, and intends to complete the payment period. Title IV, HEA assistance will continue as originally planned. Students who subsequently fail to attend or cease attendance without completing the payment period will have their withdrawal date return to the last date of attendance.

Unofficial Withdrawal

A student who does not provide official notification of his/her intent to withdraw and is absent for more than 14 consecutive calendar days, fails to maintain satisfactory academic progress, fails to comply with the school's attendance and /or conduct policy, does not meet financial obligations to the school, or violates conditions mentioned in the School contractual agreement, will be subject to termination and considered to have unofficially withdrawn.

Within two weeks of the student's last date of academic attendance, the following procedures will take place:

1. The Office will make three attempts to notify the student regarding his/her enrollment status.
2. Determine and record the student's last date of attendance as the last recorded date of academic attendance on the attendance record.
3. The student's withdrawal date is determined as the date the day after 14 consecutive calendar days of absence.
4. Notify the student in writing of their failure to contact the school and attendance status resulting in the current termination of enrollment.
5. Studio Incamminati will calculate the amount of Federal funds the student has earned, and, if any, the amount of Federal funds for which the school is responsible.
6. Calculate the school's refund requirement (see school refund calculation).
7. The school's FAA will return to the Federal fund programs any unearned portion of Title IV funds for which the school is responsible within 45 days of the date the withdrawal determination was made, and record on student's ledger card.
8. If applicable, Studio Incamminati will provide the student with a refund letter explaining Title IV requirements:

- a. The amount of Title IV aid the student has earned based upon the length of time the student was enrolled and scheduled to attend in the program and the amount of aid the student received.
 - b. Advise the student in writing of the amount of unearned Title IV, HEA aid and tuition and fees that he/she must return, if applicable.
9. Supply the student with final student ledger card showing outstanding balance due the school and available methods of repayment.
 10. A copy of the completed worksheet, check, letter, and final ledger card will be kept in the student's file.

Withdraw Before 60%

Studio Incamminati must perform a return to Title IV to determine the amount of earned aid through the 60% point in each payment period. The school will use the Department of Education's prorate schedule to determine the amount of the return to Title IV funds students have earned at the time of withdrawal.

Withdraw After 60%

After the 60% point in the payment period, students have earned 100% of the Title IV or HEA funds he/she was scheduled to receive during this period. Studio Incamminati must still perform a return to title IV to determine the amount of aid students have earned.

Studio Incamminati measures progress in credit hours, and uses the payment period for the period of calculation.

The Calculation Formula

Determine the amount of Title IV or HEA aid that was disbursed plus Title IV or HEA aid that could have been disbursed.

Calculate the percentage of Title IV, HEA aid earned by student:

- a) Determine the percentage of the period completed:
Divide the calendar days completed in the period by the total calendar days in the period (excluding scheduled breaks of five days or more AND days that the student was on an approved leave of absence).

COMPLETED DAYS

TOTAL DAYS IN PERIOD = % EARNED (rounded to one significant digit to the right of the decimal point, ex. .4493 = 44.9 %)

- b) If this percentage is greater than 60%, the student earns 100%.
If this percent is less than or equal to 60%, proceed with calculation.

Percentage earned from (multiplied by) Total aid disbursed, or could have been disbursed = AMOUNT STUDENT EARNED.

Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.

100% minus percent earned = UNEARNED PERCENT

Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM Studio Incamminati.

- c) If the percent of Title IV aid disbursed is greater than the percent unearned (multiplied by) institutional charges for the period, the amount disbursed will be used in place of the percent unearned.

If the percent unearned (multiplied by) institutional charges for the period are less than the amount due from the school, the student must return or repay one-half of the remaining unearned Federal Pell Grant.

Students are not required to return the overpayment if this amount is equal to or less than 50% of the total grant assistance that was disbursed / or could have been disbursed. The student is also not required to return an overpayment if the amount is \$50 or less.

Studio Incamminati will issue a grant overpayment notice to students within 30 days from the date the school's determination that students withdrew, giving students 45 days to either:

1. Repay the overpayment in full to Studio Incamminati

or

2. Sign a repayment agreement with the U.S. Department of Education.

Order of Return

The School is authorized to return any excess funds after applying them to current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 work sheet performed on your behalf is available through the office upon student request.

In accordance with Federal regulations, when Title IV, HEA financial aid is involved, the calculated amount of the R2T4 Funds is allocated in the following order:

- Unsubsidized Direct Stafford loans (other than PLUS loans)
- Subsidized Direct Stafford loans
- Direct PLUS loans
- Federal Pell Grants for which a Return is required
- Iraq and Afghanistan Service Grant for which a Return is required
- Institutional aid

Post Withdrawal Disbursements

Studio Incamminati must offer any amount of a post-withdrawal disbursement within 30 days of the Date of Determination to students or parents. This must be done by providing a written notification to the student or parent and identify the type and amount of the Title IV Funds that make up the Post-withdrawal Disbursements. Students must either accept or decline some or all of the Post- withdrawal Disbursement. If the Post-withdrawal Disbursement is accepted by the student and/or parent, the institution has 45 days for grants and 180 days for loans from the Date of Determination to disburse the funds or decline to do so at its own discretion.

A Post Withdrawal Disbursement must be made from available grant funds first, before taking available loan funds. No permission is required to disburse grant funds.

Institutional Responsibilities

Studio Incamminati's responsibilities in regards to Title IV, HEA funds follow:

- Providing students information with information in this policy;
- Identifying students who are affected by this policy and completing the return of Title IV funds calculation for those students;
- Returning any Title IV, HEA funds due to the correct Title IV programs.

The institution is not always required to return all of the excess funds; there are situations once the return to Title IV calculations have been completed in which the student must return the unearned aid.

Overpayment of Title IV, HEA Funds

Any amount of unearned grant funds that students must return is called an overpayment. The amount of grant overpayment that students must repay is half of the grant funds received. Students must make arrangements with Studio Incamminati or the U.S. Department of Education to return the amount of unearned grant funds.

Student Responsibilities in regards to return of Title IV, HEA funds

- Returning to the Title IV, HEA programs any funds that were dispersed in which the student was determined to be ineligible for via the return to Title IV calculation.
- Any notification of withdraw should be in writing and addressed to the appropriate institutional official.
- Students may rescind his/her notification of intent to withdraw. Submissions of intent to rescind a withdraw notice must be filed in writing.
- Either these notifications, to withdraw or rescind to withdraw, must be made to the Director of Educational Programming or President.

Refund vs. Return to Title IV

The requirements for the Title IV, HEA program funds when students withdraw are separate from the Studio Incamminati refund policy. Therefore, students may still owe funds to the school to cover unpaid institutional charges or if applicable, receive a credit balance. Studio Incamminati may also charge for any Title IV, HEA program funds that they were required to return on your behalf.

Studio Incamminati's refund policy is located in the 2019-2020 School Catalog and the 2019-2020 Policies & Guidelines. A paper copy can be provided from the office.

Return to Title IV Questions

Students who have questions regarding Title IV, HEA program funds after visiting with the Financial Aid Adviser may call the Federal Student Aid Information Center at 1-800-4-fedaid (800-433-3243). TTY users may call 800-730-8913. Information is also available on student aid on the web www.studentaid.ed.gov.

This policy is subject to change at any time, and without prior notice.

16. Studio Incamminati Policies and Sanctions on Copyright Infringement

Studio Incamminati prohibits copyright infringement. The following information will be in a notice provided annually containing a list and brief description of the consumer information the school must disclose as well as the procedures for obtaining this information.

Studio Incamminati will take disciplinary action against students who distributes unauthorized copyrighted materials including peer-to-peer file sharing and the prohibited use of the institution's information technology system for those activities. Disciplinary action will be taken against students involved in such an act and will report to the proper authorities.

Studio Incamminati abides by the copyright laws of the United States, and, although it recognizes that the fair use defense places certain limitations on the exclusive rights of copyright owners, it is nevertheless the express policy of Studio Incamminati that anyone associated with the school not rely on the doctrine of fair use, but obtain permission from the copyright owner for any non-de minimis use of a copyright protected work.

The procedures for handling copyright infringement are reviewed periodically for the effectiveness of the plan to combat unauthorized distribution of copyrighted materials by users of the institution's network.

Studio Incamminati is investigating technology-based deterrents including bandwidth shaping, traffic monitoring, accepting and responding to Digital Millennium Copyright Act notices and some commercial products designed to reduce and block illegal file sharing.

The policy regarding unauthorized distribution of copyrighted material is provided upon request to prospective and enrolled students.

A. Summary of Civil and Criminal Penalties for
Violation of Federal Copyright Laws

Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the United States Code). These rights include the right to reproduce or distribute a copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement.

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or “statutory” damages affixed at not less than \$750 and not more than \$30,000 per work infringed. For “willful” infringement, a court may award up to \$150,000 per work infringed. A court can, in its discretion, also assess costs and attorneys’ fees. For details, see Title 17, United States Code, Sections 504, 505.

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000 per offense. For more information, please see the website of the U.S. Copyright Office at www.copyright.gov

B. Legal alternatives to unauthorized downloading

The Higher Education Opportunity Act requires all colleges and universities to offer legal alternatives to unauthorized downloading. The below includes all of the legitimate online services that are approved by the AAP, MPAA, and RIAA. No endorsement or evaluation is intended. To suggest additions or provide other input, contact policy@educause.edu.

Note: Some of the sites listed provide some or all content at no charge; they are funded by advertising or represent artists who want their material distributed for free, or for other reasons. Just because content is free doesn’t mean it’s illegal. On the other hand, you may find websites offering to sell content which are not on the list below. Just because content is not free doesn’t mean it’s legal.

C. Legal Sources of Online Content

Books:

In addition to music and movies, the Internet is being used for the unauthorized distribution of books, including textbooks. For legal sources of electronic versions of textbooks and other written works, visit the list of Legally-Available Digital Versions of Textbooks and Other Written Works provided by the Association of American

Publishers at <http://www.publishers.org/productlinks/>

Movies and TV Shows:

The Motion Picture Association of America (MPAA) points to Legal Options for Movies & TV Shows on this site of services available to users in the U.S. at <http://www.mpaa.org/contentprotection/get-movies-tv-shows>

Music:

The Recording Industry Association of American (RIAA), together with NARM, the music business association, maintains the Why Music Matters website that provides a current list of the licensed music services in the United States at <http://www.whymusicmatters.com/>

17. Family Education Rights and Privacy Act of 1974 (FERPA)

Studio Incamminati will distribute annually to all enrolled students information about:

- The right to review their education records; request amendment of records; consent to disclosures of personally identifiable information; and file complaints with the U.S. Department of Education.
- Procedures for reviewing education records and requesting amendment of the records.
- Information about the Studio Incamminati's policy regarding disclosures to school officials with a legitimate educational interest in the education records.

A. Information Sharing and FERPA

What is FERPA?

The Family Rights and Privacy Act of 1974, as amended, (commonly known as the Buckley Amendment) is a federal law which provides that schools will maintain the confidentiality of student education records. The law says that no one outside the institution shall have access to students' education records nor will the institution disclose any information from those records without the written consent of students. There are exceptions so that certain authorized personnel within the institution may see the records in an emergency to protect the health or safety of students or other persons.

What is considered directory information?

In compliance with **FERPA**, the following statements summarize Studio Incamminati's policy concerning directory information.

Directory information that may be released by telephone:

- a) student's dates of attendance
- b) date of graduation and degree or certificate earned.

Directory information that may be released by only in response to a written request:

- a) student's address, telephone listing or program of study
- b) awards received
- c) the most recent previous education or institution attended.

Directory information that may be released only with a student's written consent:

- a) course grades or grade point average
- b) courses taken
- c) social security number or other personal information.

Studio Incamminati reserves the right to refuse the above information if the reason for the request is not considered to be a sufficient need to know.

Students have the right to inform Studio Incamminati that any or all of the information is not to be released. In that case, no information will be released without the written consent of the student and the status is binding until Studio Incamminati is notified in writing by the student to permit release of directory information.

Parental Access to Children's Education Records

At the postsecondary level, parents have no inherent rights to inspect a student's education record. The right to inspect is limited solely to the student. Records may be released to parents only under the following circumstances: (a) through the written consent of the student, (b) in compliance with a subpoena.

Posting of Grades by Faculty

The public posting of grades either by the student's name, institutional student identification number, or security number without the student's written permission is a violation of FERPA.

Responsibility of administrative staff and faculty

Staff and faculty of Studio Incamminati may have access to student education records. Their confidentiality, use, and release are governed by FERPA. Utilization of this information is governed by the regulations and duties and responsibilities of the position. Any requests for disclosure of information from inside or outside the school must be referred to the President. Release of information contained on a student's record without the written consent of the person identified on the document is in violation of Sec. 438 Public Law 90-247.

Staff and faculty are responsible for maintaining the protection of accounts and passwords on the computer system and e-mail. Protection of your sign-on password and procedure is critical for security.

Releasing student information

Staff authorized to release student information must remember the following:

1. Check the person's picture identification when releasing records. Verify that the student permitted disclosure of information before you releasing information.
2. Discussing a student's record with any person who does not have a legitimate educational interest is a violation of FERPA. This rule pertains to conversations on and off the job.
3. Removing documents from the office for non-business purposes is a violation of FERPA.
4. Releasing confidential student information (non-directory) to another student, College or University, organization, or to any person who does not have a legitimate educational interest, or to the parents of a dependent student without the student's written authorization is in violation of FERPA.
5. Leaving reports or computer screens containing confidential information in view of others who do not have a legitimate educational interest in the data or leaving your computer unattended is in violation of FERPA.
6. Making personal use of student information is in violation of FERPA.
7. Allowing another person to use your computer access code is in violation of FERPA.
8. Putting paperwork in the trash with a student's information (i.e., social security number or grades) is also in violation of FERPA.
9. In addition to the possibility of personal litigation, proven FERPA violations may result in loss of federal funds to Studio Incamminati.
10. Violation of confidentiality and security by staff or faculty will lead to disciplinary action.

The following information cannot be released without student's written consent:

1. Social security number or use it for confirming student's identification
2. Citizenship
3. Gender
4. Ethnicity
5. Religious preference
6. Grades
7. GPA
8. Daily class schedule-event to parents, police, or other authorities

II. STUDIO OPERATIONS

1. Hours of Operation

The Studio Administration Office is open 9 a.m. to 5 p.m., Monday through Friday, excluding holidays and semester breaks. Normal class hours are 9 a.m. to 3:45 p.m. for day classes, and 6 p.m. to 9 p.m. for evening classes. Lunch break is from noon to 12:45 p.m.

Holiday and semester schedules are posted on the bulletin board and the Studio Incamminati website. In the rare event of severe inclement weather, Studio Incamminati may elect to close or close early. In the event of school closings or delayed openings, students, faculty and staff will be sent a text message specifying a closing or delayed opening. The information also will be posted on the school's website home page at www.studioincamminati.org

In any event, students, faculty, or staff should not attend school if, in their personal determination or by the warning of law enforcement officials, travel conditions in their area are unsafe or if other circumstances would place their lives/health in jeopardy.

2. Access/Security

All studio access points should be closed and locked at all times. Access codes for the fourth and fifth floor studio entrance are given to all Advanced Fine Art Program students. Codes must be kept confidential to protect the privacy and security of the Studio Incamminati community and other building tenants.

A key is available to any Advanced Fine Art Program student who undergoes a briefing on studio opening and closing procedures. Keys may not be duplicated or shared. Keys are returned at the end of the spring semester; lost keys are subject to a \$35 replacement fee.

Students authorized to use the studio after hours are responsible for completing all studio closing procedures, and must keep the studio doors locked while working after-hours.

All Studio Incamminati property must remain on the premises, including but not limited to still life props, lights, easels, books, artwork, etc.

Stealing Studio Incamminati's or another student's property is grounds for dismissal from the school.

Only Studio Incamminati instructors, staff or authorized exhibition committee members may handle or remove hanging works of art. Artwork hanging on the walls is fragile; please be aware of the potential for damage from items brushing against artwork.

Each student is assigned a taboret for personal use. All Advanced Fine Art Program students will be assigned a locker for personal items. All Advanced

Fine Art Program students will have a shared rack for canvases and boards in the student storage room. Coats should be hung on the coat rack in the hallway. All storage areas listed above should be cleared at the end of each school year.

3. Class Procedures

Studio doors may not be opened during a model's pose. Students must wait until the model break to re-enter the studio at any time. Students who ignore this rule may be asked to leave the studio for the day. Repeated violations will result in expulsion from the class.

Students who are running late and would like their space saved may call the studio main number before 9:00 a.m. to inform the monitor. After 9 a.m., unclaimed spaces may be used by other students.

Monitors supervise the model and perform critical tasks such as setting the pose, taping positions and timing for model breaks. The monitor has the final say on the position of the model, lighting and easel placement. Monitors are also responsible for taking attendance and are the only ones to communicate with the models during a pose.

Food is prohibited in any of the studio areas. (This applies to students, instructors, workshop/evening program artists and models.) Drinks are permitted only in the designated approved areas.

4. Closing

Students are responsible for cleaning up their area at the end of their session. All materials must be moved into taborets or assigned storage units, trash disposed of and floor mats picked up. Still life draperies (with tape removed) and props must be returned to designated areas, and halogen lights turned off and unplugged after class.

Unmarked and unclaimed materials left in the studio after hours may be disposed of by staff. Studio sweeps are conducted on Friday afternoons.

There is an established procedure for closing the studio at the end of the day. Students using the studio after hours are responsible for completing all studio closing procedures.

III. HEALTH AND SAFETY

1. Materials

Art materials recommended and approved for use at Studio Incamminati are described on class supply lists.

Use of the following items is prohibited in Studio Incamminati and anywhere indoors within the Wolf Building: turpentine, varnishes containing turpentine, and charcoal powder.

2. Materials Handling

Air filtration units must be used during regular class hours.

Solvents must be kept in containers with airtight lids. After class is over for the day, all solvents used must be labeled, sealed and stored in the flammable cabinet on the 5th floor. Solvents are not to be kept in student lockers. Solvents found open and unattended after class hours will be disposed of by staff. Fixatives are to be used only in the studio spray booth.

In case of an emergency: Eye wash stations (6) are located throughout the studios and kitchen area.

Relevant Material Data and Safety binders are available for use by fire and emergency personnel and for student safety.

Students must clean up spills of solvents, paints and oils immediately and place cleanup materials in red oily waste can. There are two studio double sinks to wash brushes and clean up after painting. The kitchen sink is reserved for food preparation and cleanup of eating utensils only.

Students who are pregnant or think they may be pregnant, must consult a doctor who is familiar with the toxicology of art materials, and in particular the materials in use, to receive a definitive assessment of their circumstances and recommendations about how to proceed from a medical point of view.

3. Waste Disposal and Recycling

Red oil cans are designated for disposal of only oily materials such as solvent, paint, and oil-soaked towels. Other trash such as paper cups and napkins are disposed of in the regular trash cans. Please attach a plastic bag or other waste container to your taboret for collection of oily waste, then dispose of in red oil cans at the end of the day.

Studio Incamminati recycles glass bottles, jars, plastic containers/bottles and empty paint or aerosol cans only. Materials for recycling are to be disposed of in the blue recycle containers located throughout the studio.

Use solvent to clean brushes of excess paint before washing them with soap and water in the sink. Solvent can be reused after allowing paint residue to settle to the bottom of your container. After pouring off clear solvent, dispose of remaining sludge in the red oil container. Do not allow sludge to go into the sink. Toxic material found in excess in the pipes are subject to a heavy fine.

4. Lighting

Halogen lights used for lighting the model and still life setups get extremely hot. Please use caution when handling, for both yourself and the individuals around you. Halogen lights must not touch flammable materials, and may not be left unattended. Only Studio Incamminati monitors, instructors and staff may handle lighting on the models. Safety

lines on lighting should always be in use. Extension cords used in the studios for model lights, heaters or fans must be used with floor cord covers or be taped to the floor.

Lighting and other studio equipment is prohibited from being hung on any fire suppression system pipes.

5. Emergency Evacuation

The following is the Wolf Building Fire Evacuation Procedure:

If you discover fire or smoke, sound the building fire alarm. Know the location of the alarm signal stations and how they operate.

The central station will notify the Fire Department when an alarm is transmitted by dialing 9-1-1.

When the fire alarm sounds, leave the building at once and close doors behind you. Proceed into the fire exit and leave the building by the stairs. Do not use the elevators.

Feel doors before opening them. If it is hot or smoke is seeping in, do not open. If you become trapped in your office/studio and cannot reach the fire exit, keep the door closed and seal off any cracks. Use the telephone to call 9-1-1 and give the name and location of the building, the floor you are on and the room number. If the door feels cool, open it cautiously. Be braced to slam it shut if the corridor is full of smoke or if you feel heat pressure. If caught in smoke or heat, stay low where the air is better. Take short breaths through nose until you reach the fire exit. Be sure to keep the fire exit doors closed at all times during daily operations so that smoke does not enter the stairway. Fire exit drills are held during the school year. These drills will be scheduled and all occupants will be notified in advance.

6. Policy on Sex Discrimination, Sexual Harassment and Sexual Violence

This policy was modified March 2016 to ensure that Studio Incamminati procedures are in compliance with the guidance issued by the Office for Civil Rights on April », 2011 relating to post-secondary institutions' obligations under Title IX to respond appropriately to allegations of sexual harassment and sexual violence. Sexual harassment and sexual violence are forms of sex discrimination prohibited by Title IX. In addition to sexual violence, this policy addresses any discrimination or harassment based on gender, sexual orientation, gender identity, or gender expression. This policy was subsequently modified to ensure that Studio Incamminati is in compliance with the Violence Against Women Act amendments, Campus SaVE Act, the April 201» Questions and Answers on Title IX and Sexual Violence from the Office for Civil Rights, and guidance issued under The White House Document, Not Alone.

While this policy speaks specifically to harassment based on sexual discrimination, all incidents involving harassment under protected

classifications as outlined in the Studio Incamminati's Non-Discrimination Policy, will follow the same procedures for investigation, hearing and appeal.

A. Policy Statement

It is the policy of Studio Incamminati that while employed or enrolled at the School, no administrator, faculty member, staff member or student shall be subject to discrimination based upon sex, which can include acts of sexual violence, sexual harassment, domestic violence, dating violence and stalking, by another member of the School community. Studio Incamminati's community includes staff, faculty, guest instructors, volunteers, students, board members, models, and independent contractors. Studio Incamminati expects all members to conduct themselves in a manner that does not infringe upon the rights of others; the School believes in a zero-tolerance policy for gender-based or sexual misconduct.

Included within this Policy is Studio Incamminati's commitment to protect the individuals who are involved in an investigation of a potential violation of this Policy against retaliation from any member of the School community. Such retaliation will be deemed a separate basis for violating the School's Policy on Abuse and Molestation, Sex Discrimination, Sexual Harassment and Sexual Violence. For the purposes of this policy, abuse and molestation, sex discrimination, sexual harassment and sexual violence all fall under the category of sexual misconduct.

B. Policy Rationale

Studio Incamminati values appropriate relationships, respect for all and shared responsibility. Therefore, the School is committed to fostering an educational and working environment that is free from sexual harassment and sexual violence. In recognition of and respect for the dignity of all at School, sexual misconduct in any form, cannot, and will not, be tolerated. This policy directly supports our mission to provide a positive work and learning environment and communal respect. The last decade has witnessed a heightened awareness in our society of the various forms of sexual misconduct, and a deep and sincere concern for the Studio Incamminati community prompts us to form a Policy on Abuse and Molestation, Sex Discrimination, Sexual Harassment and Sexual Violence.

The purpose of this policy is:

- To educate the School's community on the definitions of sexual discrimination,
- To outline the steps necessary to deal most effectively with cases involving allegations of sexual misconduct, and
- To define the rights and responsibilities for members of the Studio Incamminati community.

C. Scope of Policy

- This policy and the procedures set forth herein apply to and cover all members of the Studio Incamminati community which includes all administrators, faculty, staff, and students. Title IX protects students from sexual harassment in a school's educational programs and activities both on campus and off.
- The School also contracts a number of vendors. These individuals are also protected from all forms of discrimination and are held accountable to policies and procedures outlined by their respective employers. If a vendor is accused of misconduct against a member of Studio Incamminati, the School will work collaboratively with the individual's employer. At the request of the School, these individuals may also be subject to interim measures (outlined below) while an incident is investigated and resolved.
- Employees are protected from sexual discrimination in all phases of their employment including applications, job performance, salary and promotions.
- Members of Studio Incamminati who are traveling on School business (meetings, conferences, In Your Town workshops) are expected to comply with this Policy regardless of local laws and/or customs.
- Title IX also prohibits harassment based upon sex or sex-stereotyping.
- Members of the School's community are protected from being retaliated against for filing a claim or for cooperating in an investigation.

D. Legal Definition

Discrimination or harassment on the bias of sex is a violation of Section 703 of Title VII of the 1964 Civil Rights Action and Title IX of the Educational Amendments of 1972. Unwelcome sexual advancements, requests for sexual favors, and other verbal, non-verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or a condition of an individual's employment or academic advancement;
- Submission to or rejection of such conduct by an individual is used as a basis for employment or academic decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's academic or work performance or creating an intimidating, hostile, or offensive educational, living or working environment.

E. Title IX Coordinator

Studio Incamminati designates Randi Cromer, Administrative Services Manager, as the Title IX Coordinator. The Title IX Coordinator oversees the School's centralized review, investigation, and resolution of reports of sexual misconduct. he coordinator also coordinates the School's compliance with Title IX. The Title IX coordinator is:

- responsible for oversight of the investigation and resolution of all reports of sexual misconduct;
- knowledgeable and trained in relevant state and federal laws and School policy and procedure;
- available to advise any individual, including a complainant, a respondent, or a third party, about the courses of action available at the School, both informally and formally;
- available to provide assistance to any School member regarding how to respond appropriately to reports of sexual misconduct;
- responsible for monitoring full compliance with all requirements and timelines specified in the complaint procedures; and
- responsible for compiling annual and semi-annual reports.

F. Bullying or Intimidation

Bullying includes any intentional electronic, written, verbal, or physical act or a series of acts directed at another individual or individuals that is severe, persistent, or pervasive and that has the intended effect of doing any of the following : (i) substantially interfering with a student's education; (ii) creating a threatening environment; or (iii) substantially disrupting the orderly operation of the School. Bullying is prohibited, and participating in such acts will result in disciplinary action. Bullying that is based on gender, sexual orientation, gender identity, or gender expression, or based on any other protected classification as outlined in the School's Non-Discrimination Policy will be handled underthis policy.

Intimidation is any verbal, written, or electronic threats of violence or other threatening behavior directed toward another person or group that reasonably leads the person(s) in the group to fear for her/his physical well-being. Intimidation is prohibited and will result in disciplinary action.

Anyone who attempts to use bullying or intimidation to retaliate against someone who reports an incident, brings a complaint, or participates in an investigation in an attempt to influence the judicial process will be in violation of retaliation as described within this policy and will be subject to disciplinary action.

SEXUAL MISCONDUCT OFFENSES INCLUDE, BUT ARE NOT LIMITED TO:

1. Sexual Harassment
2. Abuse & Molestation
3. Sexual Assault
 - i. Non-Consensual Sexual Contact (or attempts to commit same)
 - ii. Non-Consensual Sexual Intercourse (or attempts to commit same)
4. Sexual Exploitation
5. Stalking
6. Intimate Partner Violence: Domestic Violence or Dating Violence
7. Bullying or Intimidation

Detailed definitions and examples of these forms of misconduct are included at the end of this policy section.

G. Reporting Sexual Misconduct in Any Form

If a member has been subjected to an act of sexual misconduct, they are urged to report the incident immediately. Members may also want to discuss the event with a close friend, roommate, Resident Assistant, staff, faculty, family member, etc. who can support you through the initial medical treatment (if necessary) and reporting of the events. If a member has been the victim of sexual violence, they are urged to report the incident to the police immediately.

If a member has been the victim of an act of sexual misconduct, they may be wondering what to do next. Here are some of your options:

- Get to a place where you feel physically and emotionally safe.
- Contact someone they trust to stay with for moral support.
- Immediately report the incident to the appropriate School personnel or another person they trust.
- Immediately report the incident to the police by calling 911.
- If a member was a victim of sexual violence, it is important to seek medical care so they can be treated for injuries and tested for pregnancy and sexually transmitted diseases. Philadelphia has created the Philadelphia Sexual Assault Response Center (PSARC), located at 300 E. Hunting park Avenue, Philadelphia, PA 19124 and can be reached via phone at 215-685-3251 or 215-800-1589.
- PSARC has specially trained and certified Sexual Assault Nurse Examiners (SANE) to assist in the medical process related to forensic exams. Forensic evidence can be collected up to 96 hours after an assault has occurred.

- A forensic exam, completed by a medical practitioner, is the process through which physical evidence is collected. This evidence could be used in a judicial case, if the victim chooses to pursue charges. Physical evidence can include photo documentation of injuries, collection of fluids (blood, semen, urine, saliva) and other identifiable objects (hair, clothing with potential DNA). Forensic exams are free of charge to victims of assault and will not be billed to the victim or the insurance company.
- Avoid showering, bathing, douching or cleaning in any other way to help preserve medical evidence if you choose to prosecute. Any clothes, sheets, or other items that may be considered evidence should be stored in paper (not plastic) bags. If you are still wearing the clothes you had on at the time of the assault be sure to bring a change of clothes with you to the hospital.

H. To File A Complaint with Studio Incamminati

To make a report of an act of sexual misconduct, we encourage a member to seek out another member of the School community with whom they feel comfortable (this may include a friend, teacher, advisor, etc.). If it occurs during regular office hours, the Administrative Office should be contacted immediately at 215-592-7910. If it occurs when the school is closed, it should be reported to the Administrative Offices as soon as possible after the school is open.

All reports of sexual discrimination, molestation, harassment and violence will be reported to Randi Cromer, Title IX Coordinator. Individuals should be advised that the Title IX Coordinator is obligated to act on any report of alleged misconduct. The School does not limit the timeframe for filing a report of misconduct. Reports can be submitted at any time following an incident, although the School's ability to take any action may be negatively affected by the length of time between the alleged incident and the report.

Members may choose to pursue the incident through the School's hearing process; or to prosecute through the police; or both. Once the matter is reported, the School may have a responsibility to investigate the situation even if a member chose not to cooperate with the School. Members should not feel pressured into any option and may want to consult with their family before making a decision.

I. Types of On-Campus Reports/Confidentiality of Reports

The School encourages members who experience sexual misconduct to talk to someone about what happened so they can get the support they need, and to allow the school to respond appropriately. Different staff members have different abilities to maintain a victim's confidentiality.

- Some individuals are required to maintain complete confidentiality; talking to them is sometimes called a "privileged

communication.” These individuals have a legal and professional obligation not to reveal information shared with them in the scope of performing their duties.

- All other School employees are designated as responsible employees and are required to report all the details of an incident (including the identities of both the victim and alleged perpetrator) to the Title IX coordinator. A report to these employees constitutes a report to the School and generally obligates the School to investigate the incident and take appropriate steps to address the situation.

A. Privileged and Confidential Communications

Professional, licensed counselors who provide mental-health counseling to members of the School are not required to report any information about an incident to the Title IX coordinator without a victim’s permission. Studio Incamminati can refer members to a professional counselor when requested. However, members may also choose another counselor on their own.

B. Reporting to Responsible Employees

Studio Incamminati staff are considered responsible employees. A responsible employee is an employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other misconduct, or who is an individual who is reasonably believed to have this authority.

When a victim tells a responsible employee about an incident of sexual violence, the victim has the right to expect the School to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. A responsible employee must report to the Title IX coordinator all relevant details about the alleged incident shared by the victim so that the School can determine what happened - including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the School’s response to the report. A responsible employee should not share information with law enforcement without the victim’s consent or unless the victim has also reported the incident to law enforcement. Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee’s reporting obligations - and, if the victim wants to maintain confidentiality, direct the victim to confidential resources.

If the victim wants to tell the responsible employee what

happened but also maintain confidentiality, the employee should tell the victim that the School will consider the request, but cannot guarantee that the School will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the responsible employee will also inform the Coordinator of the victim's request for confidentiality.

Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including that the School investigate an incident fully. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to do so.

Requesting Confidentiality from Studio Incamminati: How the School Will Weigh the Request and Respond.

If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the School must weigh that request against the School's obligation to provide a safe, non-discriminatory environment for all individuals, including the victim.

If the School honors the request for confidentiality, a victim must understand that the School's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

Although rare, there are times when the School may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment.

When weighing a victim's request for confidentiality or determining that no investigation or discipline will be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:
- whether there have been other sexual violence complaints about the same alleged perpetrator;
- whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
- whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;
- whether the sexual violence was committed by multiple perpetrators;
- whether the sexual violence was perpetrated with a weapon;

- whether the victim is a minor;
- whether the School possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
- whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the School to investigate the alleged incident. If the School determines that it cannot maintain a victim's confidentiality, the School will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the School's response.

The School will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or School employees, will not be tolerated. The School will also:

- assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these);
- provide other security and support, which could include issuing a no- contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and
- inform the victim of the right to report a crime to campus or local law enforcement-and provide the victim with assistance if the victim wishes to do so.

Because the School is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the School to consider broader remedial action - such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices. If the School determines that it can respect a victim's request for confidentiality, the School will also take immediate action as necessary to protect and assist the victim.

J. Investigation, Hearing and Resolution

In order to assure a prompt and equitable resolution to the complaint,

complainants will be asked to provide an initial statement reporting the specifics of the incident, names of individuals, date, time, place, specifics which occurred, witnesses to the events described, etc. This statement will start the School's investigation of the events reported.

- An investigation will be conducted once a statement is filed. Statements may be filed by the complainant, by a parent or by a third party.
- If requested, every effort will be made to investigate the incident confidentially. The School cannot promise complete confidentiality. Information can only be shared within the School if there is a "legitimate educational need." In order for information to be shared outside of the School, a complainant would need to give explicit permission or that information would need to be subpoenaed. It should be noted that the School's ability to thoroughly investigate and resolve incidents of sexual misconduct may be limited should the complainant not want his or her name or any identifiable information shared.
- The person who makes the report is the complainant and the individual named in the report is the respondent.
- The respondent will be asked to provide his/her version of the events. The complainant's statement will be shared with the respondent.
- The respondent's statement will be shared with the complainant.
- In the event there is little or no dispute between the versions of the events and the respondent admits the conduct, the matter may be resolved without a hearing at the discretion of the Title IX Coordinator or designated investigator. The appropriate discipline may be imposed by the School based upon the facts admitted during the investigation. If the complainant concurs with the School's resolution, the matter is concluded without the need for a hearing.
- Even when there is significant difference in the facts relayed by the complainant and respondent, the School may impose interim measures on the respondent.
- If the facts are in dispute and the Title IX Coordinator concludes there is a basis to move forward, a private disciplinary hearing will be held where the complainant and respondent will each be treated without prejudice or bias and where each will only be asked to answer questions relevant to the specific misconduct under consideration.
- A specially trained hearing panel will be convened to adjudicate allegations of sexual misconduct. New members of this hearing panel receive training on Title IX, current guidance from the

Office for Civil Rights at the Department of Education and the School's judicial process. Refresher trainings are held for the full panel annually.

- The hearing panel will contain between 3-5 members for each hearing. These members are drawn from a pool of between 5-10 trained members. Panel members may recuse themselves from any hearing due to conflict of interest or other inability to fully participate in a complete hearing.
- The Title IX Coordinator will serve also as Secretary is to ensure that all policies and procedures, as outlined in the Policies & Guidelines are followed.
- The School will use its best efforts to complete its investigation within 14 business days of the date it receives the Statements and to schedule a disciplinary hearing within another 7 business days.
- The parties may mutually agree to extend these time periods.
- This hearing will not be, and may not be, taped. Out of respect for privacy, the School requests that all students keep information from a hearing confidential and that employees exercise discretion regarding the information disclosed in the hearings.
- Both parties need to submit any additional documentation to the hearing officer at least 48 hours prior to the hearing and will be shared with the respective parties. Both parties will be shown a copy of the statements provided by the other party; this includes statements from any witnesses of fact.
- At least 72 hours' notice will be given to appear at the hearing and a written decision, complete with sanctions, if any, will be received within 10 business days after the hearing.
- If desired, the complainant will be permitted to attend the entire hearing. If the complainant chooses not to attend the hearing, he or she will be offered the opportunity to submit a written statement of fact to be read at the hearing. If the respondent fails to appear, he or she may submit a written statement of fact to be read at the hearing. If either party declines to participate, the hearing will move forward and no adverse inference will be drawn.
- Both parties are permitted to bring an advisor or advocate with them to the hearing. This advisor may be a member of the School's community. This person will not be permitted to speak during the hearing but can stay for the duration to provide support.
- Once the original statement has been filed, the School will use its best efforts to process the incident (this includes investigation of facts, hearing notification, the hearing, deliberation, notification of the outcome of the hearing and the appeal process) within 60

business days. Circumstances may arise that require the extension of time frames, including extension beyond sixty (60) days. Such circumstances may include the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening school break or vacation, or other unforeseen circumstances. In the event that the investigation and resolution exceed this time frame, the School will notify all parties of the reason for the delay and the expected adjustment in time frames. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

- Character witnesses are not permitted at the hearing. In determining a remedy, the School may take into consideration the prior disciplinary history of the respondent.
- The School utilizes preponderance of evidence as the standard of proof in disciplinary proceedings; this standard is met if the proposition is more likely to be true than not true. Preponderance of evidence is the acceptable standard for civil cases.
- The complainant and respondent will be notified of the outcome of the hearing; this notification will be made in writing and will occur as concurrently as possible.
- The process will terminate if the respondent is no longer a student or employee.
- The School will cooperate to the extent permitted by law with criminal proceedings. The School does not condone retaliation towards the respondent or the complainant.
- Any claims of retaliation will be investigated and those individuals will be subject to disciplinary action. Please see the end of this policy for additional information on retaliation.
- Mediation will not be used to resolve sexual violence complaints.

K. Appeals

- Both parties have the right to appeal. A letter of appeal should be addressed to the President within 3 business days of receipt of the decision. This letter should include fact-based reasoning for appeal, such as failure to abide by existing procedures, failure to consider relevant information, etc. The parties will receive written notice of an appeal decision within 10 business days. Additional details about the Appeal Process are described below.
- Appeals will go to a specially trained appeals board. The School's Appeals Board may consist of faculty, administrators or board members as appointed by the President. The non-appealing party will be notified that the appeal has been filed.

Once it is formed, the Appeals Board will notify the parties if additional documentation is requested and the time period for its submission. All documentation reviewed by the Board will be made available in advance for both parties to review and submit comments; comments will be shared with one another. If evidence is discovered after the conclusion of the hearing, this new evidence will be reviewed by the Appeals Board. Both parties will be made aware of any new evidence.

- The Appeals Board will, after reviewing all available evidence and documentation, make a recommendation to the President. In cases involving a recommendation of suspension or expulsion, the recommendation of the Appeals Board will be issued to the President.
- In cases not involving suspension or expulsion, there is no right for either party to appeal to the President. Both parties will receive written notice of the appeal decisions within 10 business days after the Appeals Board has received any additional documentation it may request. As stated earlier, the review of the Appeals Board is limited to fact-based issues and includes evidence of improper or inadequate procedure, prejudicial conduct and/or disproportionate penalty.
- Sanctions, such as interim suspension from the School may be imposed during the appeals process by the President.

Complaints Involving Faculty or Staff

Upon receipt of a statement involving faculty members or employees of the School, the Title IX Coordinator will assign an investigator to conduct the investigation. Impartial hearing officer(s) will be appointed by the Board Chairman to conduct the hearing. An employee may only be suspended or terminated by the President. If the hearing officer recommends suspension or termination, the matter will go to the President.

L. Sanctions

Individuals found responsible for violating this policy may face one or more of the following sanctions. The severity of the incident, past judicial record, attitude and willingness to make amends will be taken into consideration when determining sanctioning.

Students

- Disciplinary Warning: notice to the student, orally or in writing, that continuation or repetition of the conduct found wrongful, within a period of time stated in the warning, may be cause for more severe disciplinary action.
- Disciplinary Probation: an official written notice to a student that violation of School's policies, regulations, or patterns contrary to

School standards or expectations, will not be tolerated. Repeated offenses or violations of any conditions of probation will result in more severe action, including possible suspension or expulsion. Disciplinary probation lasts for a stated time.

- Educational Sanctions: include but are not limited to counseling, classes and/or community engagement/service.
- Loss of key access to the school.
- Suspension from the School for a specific period of time.
- Expulsion: termination (after due process) of student status for an indefinite period. The conditions of readmission, if permitted, shall be stated in the order of expulsion.

Faculty and Staff

Faculty and staff must follow all rules listed in the Policies & Guidelines manual. Concerns brought to the attention of the administration will ordinarily be addressed by a series of gradual steps involving strategies to resolve issues that have been identified. For example, the steps may include personal conferences, verbal and written warnings, and opportunities for assistance where applicable. When these steps are not warranted because of the seriousness of a violation, or when they do not result in a satisfactory resolution, individuals may be subject to suspension, probation, and/or dismissal.

M. Retaliation

Studio Incamminati strictly prohibits retaliation against any individual for reporting, providing information, exercising one's rights or responsibilities, or otherwise being involved in the process of responding to, investigating, or addressing allegations of sex discrimination, sexual harassment, and sexual violence. Therefore, any retaliation, intimidation, threats, coercion, or discrimination against any such individual, undertaken or attempted either directly or by someone acting on behalf of another, will be addressed in the most serious way by the School, and individuals who engage in such actions are subject to discipline up to and including suspension, expulsion, or dismissal. These behaviors will result in subsequent disciplinary proceedings. Anyone who is aware of possible retaliation or has other concerns regarding the response to a complaint of sexual misconduct should report such concerns to the Title IX Coordinator, who shall take appropriate actions to address such conduct in a prompt and equitable manner.

N. Title IX Coordinator

Studio Incamminati designates Randi Cromer, Administrative Services Manager, as its Title IX coordinator. Her contact information is rcromer@studioincamminati.org or 215-592-7910. Any questions or complaints regarding the School's policy or its implementation should

be promptly brought to the attention of the Title IX coordinator. The Title IX Coordinator will maintain a confidential list of the complaints made under this policy, the disposition of these complaints and the timeline for resolution.

O. To File a Complaint with the Office of Civil Rights

Anyone who wishes to file a complaint with the Office of Civil Rights (OCR) may do so through the mail, email or online. Prior to filing a complaint with OCR against an institution, a potential complainant should review the grievance process and use that process to have the complaint resolved. However, a complainant is not required by law to use the institutional grievance process before filing a complaint with OCR. If a complainant uses an institutional grievance process and also chooses to file the complaint with OCR, the complaint must be filed with OCR within 60 days after completion of the institutional grievance process. For more information on filing a complaint, please visit the OCR website at <http://www2.ed.gov/about/offices/list/ocr/index.html>

P. Record Keeping

After a matter is concluded, the individual who conducted the investigation shall prepare a written summary of the matter. The purpose of the summary is (1) to ensure the School is aware of repeat incidents by the same individual and (2) for record keeping purposes so the School can evaluate the effectiveness of its anti-harassment policy and procedures. This summary will be kept in a separate file which may be consulted for the two purposes stated.

Q. Supplemental Information

DEFINITIONS OF SEXUAL MISCONDUCT

1. Sexual Harassment

Sexual Harassment is:

- unwelcome, gender-based verbal or physical conduct that is,
- sufficiently severe, persistent or pervasive that it,
- unreasonably interferes with, denies or limits someone's ability to participate in or benefit from the university's educational program and/ or activities, and is
- based on power differentials (quid pro quo, i.e. where an employee or student is informed their job or academic progress is dependent on their providing sexual favors to someone with authority over them), the creation of a hostile environment, or retaliation.

Examples include: an attempt to coerce an unwilling person into a sexual relationship; to repeatedly subject a person to egregious, unwelcome sexual attention; to punish a refusal to comply with a sexual based request; to condition a benefit on submitting to sexual

advances; sexual violence; intimate partner violence, stalking; gender-based bullying.

Sexual harassment also includes harassment based on gender, sexual orientation, gender identity, or gender expression, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex/gender or sex/gender-stereotyping, even if the acts do not involve conduct of a sexual nature.

A single, isolated incident of sexual harassment alone may create a hostile environment if the incident is sufficiently severe. The more severe the conduct the less need there is to show a repetitive series of incidents to create a hostile environment, particularly if the harassment is physical.

2. Abuse and Molestation

Sexual abuse takes the form of inappropriate sexual contact or interaction for the gratification of the actor who is functioning as a caregiver and is responsible for the student's or child's care. Sexual abuse includes sexual assault, exploitation, molestation or injury. It does not include sexual harassment, which is another form of behavior, which is prohibited at Studio Incamminati.

- Sexual abuse usually involves either sexual intercourse or deviant sexual intercourse.
- Sexual abuse happens to people of all ages, however, molestation only happens to children.
- (i) Because Studio Incamminati hosts high-school aged students in our Emerging Artists Program, it is important that we implement a **Personal Interaction Policy**. This policy is intended to guide all Studio Incamminati employees in conducting themselves in a way that reflects the high standards of behavior and professionalism required of employees who interact with students and to specify the boundaries between students and staff. Trespassing the boundaries of a student/staff relationship is deemed an abuse of power and a betrayal of public trust. It is each employee's obligation to avoid situations that could prompt suspicion by parents, students, colleagues, or school leaders. When any employee reasonably suspects or believes that another staff member may have crossed the boundaries specified in this policy, he or she must immediately report the matter to the school administrator. All reports shall be as confidential as possible under the circumstances. It is the duty of the administrator to investigate and report thoroughly the situation. Employees must also report to the administration any awareness or concern of student behavior that crosses boundaries or where a student appears to be at risk for sexual abuse.

3. Sexual Assault

Sexual assault is defined as having sexual intercourse or sexual contact with another individual without consent, including:

- by the use or threat of force or coercion;
- without effective consent; or
- where that individual is incapacitated.

Sexual contact includes intentional contact with the intimate parts of another, causing another to touch one's intimate parts, or disrobing or exposure of another without permission. Intimate parts may include the breasts, genitals, buttocks, groin, mouth, or any other part of the body that is touched in a sexual manner. Sexual contact also includes attempted sexual intercourse.

Sexual intercourse includes vaginal or anal penetration, however slight, with a body part (e.g., penis, tongue, finger, hand, etc.) or object, or oral penetration involving mouth to genital contact.

It is important to note that a person who is incapacitated cannot consent to sexual activity. Consent to engage in sexual activity must be knowing and voluntary; it must exist from the beginning to end of each instance of sexual activity and for each form of sexual contact. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. Consent is active, not passive. Incapacitation may result from the use of alcohol and/or drugs. Incapacitation and consent are further defined at the end of this policy. Sexual contact and sexual intercourse are defined in additional detail in items i. and ii. below:

i. NON-CONSENSUAL SEXUAL CONTACT

Non-Consensual Sexual Contact is:

- any intentional sexual touching,
- however slight,
- with any object,
- by a man or a woman upon a man or a woman,
- that is without consent and/or by force. Sexual Contact includes:
- Intentional contact with the breasts, buttock, groin, or genitals, or touching another with any of these body parts, or making another touch you or themselves with or on any of these body parts; any intentional bodily contact in a sexual manner, though not involving contact with/of/ by breasts, buttocks, groin, genitals, mouth or other orifice.

ii. NON-CONSENSUAL SEXUAL INTERCOURSE

Non-Consensual Sexual Intercourse is:

- any intentional sexual touching,
- however slight,
- with any object,
- by a man or a woman upon a man or a woman,
- that is without consent and/or by force. Intercourse includes:
- Vaginal penetration by a penis, object, tongue or finger, anal penetration by a penis, object, tongue, or finger, and oral copulation (mouth to genital contact or genital to mouth contact), no matter how slight the penetration or contact.

4. Sexual Exploitation

Occurs when an individual takes non-consensual or abusive sexual advantage of another for his/her own advantage or benefit, or to the benefit or advantage of anyone other than the one being exploited, and that behavior does not otherwise constitute one of other sexual misconduct offenses. Examples of sexual exploitation include, but are not limited to:

- Invasion of sexual privacy;
- Prostituting another individual;
- Non-consensual video or audio-taping of sexual activity;
- Going beyond the boundaries of consent (such as letting your friends hide in the closet to watch you having consensual sex);
- Engaging in voyeurism;
- Knowingly transmitting an STI/D or HIV to another individual;
- Exposing one's genitals in non-consensual circumstances; inducing another to expose their genitals;
- Sexually-based stalking and/or bullying may also be forms of sexual exploitation

5. Stalking

Stalking occurs when a person engages in a course of conduct or repeatedly commits acts toward another person, including following the person without proper authority, under circumstances that demonstrate either of the following:

- place the person in reasonable fear of bodily injury; or
- reasonably cause substantial emotional distress to the person. Stalking includes the concept of cyber-stalking, a particular form of stalking in which electronic media such as the Internet, social networks, blogs, cell phones, texts, or other similar devices

or forms of contact are used to pursue, harass, or to make unwelcome contact with another person in an unsolicited fashion.

Examples of stalking include:

- unwelcome and repeated visual or physical proximity to a person;
- repeated oral or written threats;
- extortion of money or valuables;
- unwelcome/unsolicited written communication, including letters, cards, emails, instant messages, and activity through social media or other online mediums;
- unwelcome/unsolicited communications about a person, their family, friends, or co-workers; or
- sending/posting unwelcome/ unsolicited messages with an assumed identity; or
- implicitly threatening physical contact;
- or any combination of these behaviors directed toward an individual person.

6. Intimate Partner Violence: Domestic Violence or Dating Violence

Intimate-partner violence, also referred to as dating violence, domestic violence, and relationship violence, includes any act of violence or threatened act of violence against a person who is, or has been involved in, a sexual, dating, domestic, or other intimate relationship with that person. It may involve one act or an ongoing pattern of behavior. Intimate-partner violence can encompass a broad range of behavior, including, but not limited to, physical violence, sexual violence, emotional violence, and economic abuse. Intimate-partner violence may take the form of threats, assault, property damage, or violence or threat of violence to one's self, one's sexual or romantic partner, or to the family members or friends of the sexual or romantic partner. Intimate-partner violence affects individuals of all genders, gender identities, gender expressions, and sexual orientations and does not discriminate by racial, social, or economic background.

7. Bullying or Intimidation

Bullying includes any intentional electronic, written, verbal, or physical act or a series of acts directed at another individual or individuals that is severe, persistent, or pervasive and that has the intended effect of doing any of the following: (i) substantially interfering with a student's education; (ii) creating a threatening environment; or (iii) substantially disrupting the orderly operation of the School. Bullying is prohibited, and participating in such acts will result in disciplinary action. Bullying that is based on gender, sexual orientation, gender identity, or gender expression, or based on

any other protected classification as outlined in the School's Non-Discrimination Policy will be handled under this policy.

Intimidation is any verbal, written, or electronic threats of violence or other threatening behavior directed toward another person or group that reasonably leads the person(s) in the group to fear for her/his physical well-being. Intimidation is prohibited and will result in disciplinary action.

Anyone who attempts to use bullying or intimidation to retaliate against someone who reports an incident, brings a complaint, or participates in an investigation in an attempt to influence the judicial process will be in violation of retaliation as described within this policy and will be subject to disciplinary action.

ADDITIONAL APPLICABLE DEFINITIONS:

1. Consent:

Consent is clear, knowing and voluntary. Consent is active, not passive. Silence, in and of itself, cannot be interpreted as consent. The lack of a "no" cannot be interpreted as consent. Consent can be given by words or actions, as long as those words or actions create mutually understandable clear permission regarding willingness to engage in (and the conditions of) sexual activity.

- Consent to any one form of sexual activity cannot automatically imply consent to any other forms of sexual activity.
- Previous relationships or prior consent cannot imply consent to future sexual acts.
- The School affirms a "yes means yes" standard for consent; by this standard, consent is an affirmative, conscious and voluntary agreement to engage in sexual activity

2. Force:

Force is the use of physical violence and/or imposing on someone physically to gain sexual access. Force also includes threats, intimidation (implied threats) and coercion that overcome resistance or produce consent ("Have sex with me or I'll hit you. Okay, don't hit me, I'll do what you want.").

- Coercion is unreasonable pressure for sexual activity. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. When someone makes clear to you that they do not want sex, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.
- NOTE: There is no requirement that a party resists the sexual

advance or request, but resistance is a clear demonstration of non-consent. The presence of force is not demonstrated by the absence of resistance. Sexual activity that is forced is by definition non-consensual, but non-consensual sexual activity is not by definition forced.

- In order to give effective consent, one must be of legal age.
- Sexual activity with someone who one should know to be or based on the circumstances should reasonably have known to be mentally or physically incapacitated (by alcohol or other drug use, unconsciousness or blackout), constitutes a violation of this policy.
- Incapacitation is a state where someone cannot make rational, reasonable decisions because they lack the capacity to give knowing consent (e.g., to understand the “who, what, when, where, why or how” of their sexual interaction).
- This policy also covers a person whose incapacity results from mental disability, sleep, involuntary physical restraint, or from the taking of rape drugs. Possession, use and/or distribution of any of these substances, including Rohypnol, Ketomine, GHB, Burundanga, etc. is prohibited, and administering one of these drugs to another individual is a violation of this policy. More information on these drugs can be found at <http://www.911rape.org/>
- Use of alcohol or other drugs will never function as a defense for any behavior that violates this policy.
- The sexual orientation and/or gender identity of individuals engaging in sexual activity is not relevant to allegations under this policy.
- For reference to the pertinent state statutes on sex offenses, please see:

<http://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/18/00.031..HTM>

EXTERNAL RESOURCES:

Medical Care for Sexual Assault:

Philadelphia Sexual Assault Response Center (PSARC)
300 E. Hunting Park Avenue
Philadelphia, PA 19124
215-685-3251
Hotline: 215-425-1625

24 Hour Hotlines:

Women Organized Against Rape 215.985-3333*
National Sexual Assault Hotline: 800-656-HOPE*
Philadelphia Domestic Violence Hotline: 866-SAFE-041

Sexual Harassment:

Women's Law Project 215.928.9801

Philadelphia Commission on Human Relations 215.686.4692

Prosecution:

Special Victims Unit 215.685.3251

Police Sex Crimes Unit 215.685.1180/81/82

Rape Prosecution Unit 215.686.8083

Please note that these resources are in Philadelphia. For locations outside of Philadelphia please call 911.

*These resources are confidential

R. School Prevention Efforts

Prevention efforts focus not only on education, but also primary prevention techniques such as bystander intervention, as well as providing alternative programming for individuals. Alternative programming sometimes has an educational component, but sometimes it is purely designed to provide an alcohol and drug free environment for individuals, thus helping to minimize their own risk. Examples of programs are included in the chart below:

Type of Program	Examples
Lectures	Sexual Violence Prevention presented annually each September by Levone Cannaday, Education Specialist, Women Organized Against Rape
Awareness Programs	Orientation Day training and distribution of Drug and Alcohol Prevention Handbook and Sexual Violence Prevention policies
Training	Sexual Harassment and Abuse and Molestation Training

- To inform our Employees and Instructors about abuse and molestation, sexual harassment, and sexual violence all are required to attend the Women Organized Against Rape lectures that take place on two different days:
 - September 16, 2019 at 12PM in the lecture room.
 - September 18, 2019 at 12PM in the lecture room.

Randi Cromer, Administrative Services Manager, will collect

signed acknowledgements from all Employees and Instructors proving that they attended the lectured and were trained on Abuse and Molestation, Sexual Harassment, and Sexual Violence.

- A Criminal background screening is required for all Employees, Board Members, and Instructors to check for criminal offenses. Studio Incamminati requires that all Employees, Board Members, and Instructors have a clear criminal record to work or volunteer with the school. Once the Employee, Board Member, and Instructor is hired they will be required to complete a criminal background screening every three years or as requested by the President of Studio Incamminati. We do this to ensure we maintain a safe, educational environment for our students.

S. Educational Resources

Our goal is to always prevent an incident from occurring. With this goal in mind, the remaining section includes examples of policy violations and risk reduction tips.

Examples

1. Amanda and Bill meet at a party. They spend the evening dancing and getting to know each other. Bill convinces Amanda to come up to his room. From 11:00 pm until 3:00 am, Bill uses every line he can think of to convince Amanda to have sex with him, but she adamantly refuses. He keeps at her, and begins to question her religious convictions, and accuses her of being “a prude.” Finally, it seems to Bill that her resolve is weakening, and he convinces her to give him a “hand job” (hand to genital contact). Amanda would never had done it but for Bill’s incessant advances. He feels that he successfully seduced her, and that she wanted to do it all along, but was playing shy and hard to get.

Why else would she have come up to his room alone after the party? If she really didn’t want it, she could have left.

Bill is responsible for violating the Non-Consensual or Forced Sexual Contact section of this policy.

It is likely that a School hearing would find that the degree and duration of the pressure Bill applied to Amanda are unreasonable. Bill coerced Amanda into performing unwanted sexual touching upon him. Where sexual activity is coerced, it is forced. Consent is not effective when forced. Sex without effective consent is sexual misconduct.

2. Jiang is a junior and Beth is a sophomore. Jiang comes to Beth’s dorm room with some mutual friends to watch a movie. Jiang and Beth, who have never met before, are attracted to each other. After the movie, everyone leaves, and Jiang and Beth are alone. They hit it off, and are soon becoming more intimate. They start to make out. Jiang verbally expresses his desire to have sex with Beth. Beth, who was abused by a baby-sitter when she was five,

and has not had any sexual relations since, is shocked at how quickly things are progressing. As Jiang takes her by the wrist over to the bed, lays her down, undresses her, and begins to have intercourse with her, Beth has a severe flashback to her childhood trauma. She wants to tell Jiang to stop, but cannot. Beth is stiff and unresponsive during the intercourse. Is this a policy violation?

Jiang would be held responsible in this scenario for Non-Consensual Sexual Intercourse. It is the duty of the sexual initiator, Jiang, to make sure that he has mutually understandable consent to engage in sex. Though consent need not be verbal, it is the clearest form of consent. Here, Jiang had no verbal or non-verbal mutually understandable indication from Beth that she consented to sexual intercourse. Of course, wherever possible, students should attempt to be as clear as possible as to whether or not sexual contact is desired, but students must be aware that for psychological reasons, or because of alcohol or drug use, one's partner may not be in a position to provide as clear an indication as the policy requires. As the policy makes clear, consent must be actively, not passively, given.

3. Kevin and Amy are at a party. Kevin is not sure how much Amy has been drinking, but he is pretty sure it's a lot. After the party, he walks Amy to her room, and Amy comes on to Kevin, initiating sexual activity. Kevin asks her if she is really up to this, and Amy says yes. Clothes go flying, and they end up in Amy's bed. Suddenly, Amy runs for the bathroom. When she returns, her face is pale, and Kevin thinks she may have thrown up. Amy gets back into bed, and they begin to have sexual intercourse. Kevin is having a good time, though he can't help but notice that Amy seems pretty groggy and passive, and he thinks Amy may have even passed out briefly during the sex, but he does not let that stop him. When Kevin runs into Amy the next day, he thanks her for the wild night. Amy remembers nothing, and decides to make a complaint to the Dean.

This is a violation of the Non-Consensual Sexual Intercourse Policy. Kevin should have known that Amy was incapable of making a rational, reasonable decision about sex. Even if Amy seemed to consent, Kevin was well aware that Amy had consumed a large amount of alcohol, and Kevin thought Amy was physically ill, and that she passed out during sex. Kevin should be held accountable for taking advantage of Amy in her condition. This is not the level of respectful conduct expected of students.

T. Risk Reduction Tips

Risk reduction tips can often take a victim-blaming tone, even unintentionally. With no intention to victim-blame, and with

recognition that only those who commit sexual violence are responsible for those actions, these suggestions may nevertheless help you to reduce your risk experiencing a non-consensual sexual act. Below, suggestions to avoid committing a non-consensual sexual act are also offered:

- If you have limits, make them known as early as possible.
- Tell a sexual aggressor “NO” clearly and firmly.
- Try to remove yourself from the physical presence of a sexual aggressor.
- Find someone nearby and ask for help.
- Take affirmative responsibility for your alcohol intake/drug use and acknowledge that alcohol/drugs lower your sexual inhibitions and may make you vulnerable to someone who views a drunk or high person as a sexual opportunity.
- Take care of your friends and ask that they take care of you. A real friend will challenge you if you are about to make a mistake. Respect them when they do.

If you find yourself in the position of being the initiator of sexual behavior, you owe sexual respect to your potential partner. These suggestions may help you to reduce your risk for being accused of sexual misconduct:

- Clearly communicate your intentions to your sexual partner and give them a chance to clearly relate their intentions to you.
- Understand and respect personal boundaries.
- DON'T MAKE ASSUMPTIONS about consent; about someone's sexual availability; about whether they are attracted to you; about how far you can go or about whether they are physically and/or mentally able to consent. If there are any questions or ambiguity then you DO NOT have consent.
- Mixed messages from your partner are a clear indication that you should stop, defuse any sexual tension and communicate better. You may be misreading them. They may not have figured out how far they want to go with you yet. You must respect the timeline for sexual behaviors with which they are comfortable.
- Don't take advantage of someone's drunkenness or drugged state, even if they did it to themselves.
- Realize that your potential partner could be intimidated by you, or fearful. You may have a power advantage simply because of your gender or size. Don't abuse that power.
- Understand that consent to some form of sexual behavior does not automatically imply consent to any other forms of sexual behavior.

- Silence and passivity cannot be interpreted as an indication of consent. Read your potential partner carefully, paying attention to verbal and non- verbal communication and body language.

7. Social Media Policy

This policy provides guidance for employee use of social media, which should be broadly understood for purposes of this policy to include blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share information with others in a contemporaneous manner.

PROCEDURES

The following principles apply to professional use of social media on behalf of Studio Incamminati as well as personal use of social media when referencing Studio Incamminati.

- Employees need to know and adhere to the school’s policy on Bullying, Intimidation, Abuse and Molestation, Sexual Discrimination, Sexual Harassment and Sexual Violence found in the school’s Policies & Guidelines when using social media in reference to Studio Incamminati.
- Employees should be aware of the effect their actions may have on their images, as well as Studio Incamminati image. The information that employees post or publish may be public information for a long time.
- Employees should be aware that Studio Incamminati may observe content and information made available by employees through social media. Employees should use their best judgment in posting material that is neither inappropriate nor harmful to Studio Incamminati, its employees, or customers.
 - Although not an exclusive list, some specific examples of prohibited social media conduct include posting commentary, content, or images that are defamatory, pornographic, proprietary, harassing, libelous, or that can create a hostile work environment.
 - Employees are not to publish, post or release any information that is considered confidential or not public. If there are questions about what is considered confidential, employees should check with the Human Resources Department and/or supervisor.
 - Social media networks, blogs and other types of online content sometimes generate press and media attention or legal questions. Employees should refer these inquiries to authorized Studio Incamminati spokespersons.
 - If employees find encounter a situation while using social media that threatens to become antagonistic, employees should disengage from the dialogue in a polite manner and seek the advice of a supervisor.

- Employees should get appropriate permission before you refer to or post images of current or former employees, members, vendors or suppliers. Additionally, employees should get appropriate permission to use a third party’s copyrights, copyrighted material, trademarks, service marks or other intellectual property.
 - Social media use shouldn’t interfere with employee’s responsibilities at Studio Incamminati. Studio Incamminati’s computer systems are to be used for business purposes only. When using Studio Incamminati’s computer systems, use of social media for business purposes is allowed (ex: Instagram, Facebook, Twitter, blogs, LinkedIn), but personal use of social media networks or personal blogging of online content is discouraged and could result in disciplinary action.
 - Subject to applicable law, after-hours online activity that violates Studio Incamminati’s Policies & Guidelines or any other company policy may subject an employee to disciplinary action or termination.
 - If employees publish content after-hours that involves work or subjects associated with Studio Incamminati’s, a disclaimer should be used, such as this: “The postings on this site are my own and may not represent Studio Incamminati’s positions, strategies or opinions.”
- It is highly recommended that employees keep Studio Incamminati related social media accounts separate from personal accounts, if practical.

8. Studio Incamminati Campus Security

Security on campus is handled by the Administrative Office in cooperation with the Wolf Building and the Philadelphia Police Department. The Administrative Office will enforce school regulations, investigate incidents, and report students who violate these regulations or commit crimes on campus. Criminal violators will be turned over to the Philadelphia Police District, 235 North 11th Street, Philadelphia, PA, 215-686-3060 for arrest processing. When necessary, Studio Incamminati will press charges against criminal violators.

Studio Incamminati prepares a Campus Crime Report annually to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act). This report is prepared in cooperation with local law enforcement agencies. Nothing in the law shall be construed to permit a school to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual with respect to the implementation of the Clery Act.

Studio Incamminati attempts to provide students and employees with a safe and secure environment in which to study and work. The school is located within the Wolf Building which has its own security measures including cameras and entrance security codes. The school has no residence halls.

All studio access points should be closed and locked at all times. Access codes for the fourth and fifth floor studio entrances are given to all Full-time Advanced Fine Art Program students. Codes must be kept confidential to protect the privacy and security of the Studio Incamminati community and other building tenants.

A key is available to students enrolled in the Advanced Fine Art Program who undergo a briefing on studio opening and closing procedures. Keys may not be duplicated or shared. Keys are returned at the end of the spring semester; lost keys are subject to a \$35 replacement fee.

All Studio Incamminati property must remain on the premises, including but not limited to still life props, lights, easels, books, artwork, etc. Stealing Studio Incamminati's or another student's property is grounds for dismissal from the school.

9. Personal Safety

While the school attempts to provide a safe and secure environment, students, faculty, staff, and visitors are ultimately responsible for their safety. Safety is enhanced when individuals take precautions such as:

1. Report all suspicious activity to Administrative Office immediately.
2. Never take personal safety for granted.
3. Avoid walking alone at night. Travel with a friend or companion.
4. Avoid parking or walking in secluded or dimly lit areas.
5. Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively.
6. Carry only small amounts of cash.
7. Never leave valuables (wallets, purses, books, computers, etc.) unattended.
8. Carry your keys with you at all times and don't lend them to anyone.
9. Lock your car doors and close the windows when leaving your car.
10. Never leave valuables in your car especially if they are easily noticeable.
11. Inventory your personal property and make records of the serial numbers of all items of value.
12. Never admit anyone on school premises that is not student, teacher, or other authorized personnel.

As Studio Incamminati becomes aware of relevant programs that address responsible practices and procedures that enhance personal safety, such information will be shared with students, faculty and staff.

10. Reporting a Crime

If students, faculty, or staff are aware that a crime has been, or is being committed on school property or at a school sponsored or recognized event off- campus during the hours that the school is open, the crime should be reported as soon as possible to the Administrative Office. If the crime has been committed when the school is closed, it should be reported to the Administrative Office as soon as possible after school is open. In addition, the crime should be reported to local law enforcement authorities. The Philadelphia Police Department maybe reached by dialing 911.

Studio Incamminati has the authority to determine whether individuals have lawful business at the school and may request identification to make that determination. Studio Incamminati ensures that school policies are followed and works with local law enforcement agencies and refers criminal incidents to the local police department having jurisdiction over such matters.

The President works with local law enforcement when a crime is reported. Crimes reported to the Administrative Office are included in the annual campus crime statistics. In addition, the school requests from the Philadelphia Police Department crime information not reported to the Administrative Office that

is appropriate for inclusion in the annual campus crime statistics. Further, if circumstances warrant, students, faculty, and staff will be notified if an ongoing threat is posed related to a reported crime.

Students, faculty, or staff who are the victim of a crime and do not want to pursue action through the school or the criminal justice system may still consider making a confidential report. The purpose of a confidential report is to comply with the request to keep the matter confidential while taking steps to ensure future safety. Reports filed in this manner are included in the annual crime statistics for the school.

Studio Incamminati does not tolerate violence or other threatening conduct against any members of the school community including criminal acts against persons or property, as well as harassment based on sex, race, ethnicity, or disability. The school will impose strict disciplinary actions and appropriately involve law enforcement officials should any acts of violence or threatening conduct occur on school facilities or at school-sponsored events. This includes acts of violence against women.

Individuals who council a victim on behalf of the school must inform persons they are counseling of procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

As part of school orientation, Studio Incamminati will provide a description of programs designed to inform students and employees about the prevention of crime.

Studio Incamminati has a zero-tolerance policy regarding unauthorized alcohol on campus and will strictly enforce this policy. Anyone violating this policy will be removed from school properly and disciplinary action will be taken. Studio Incamminati has a separate drug and alcohol prevention policy which is distributed to students, faculty and staff annually.

In addition to any criminal sanctions, the school will impose appropriate disciplinary sanctions if the offender is a student or employee of the school. The Administrative Office should be contacted to file a complaint. In cases of sexual assault complaints:

- Both the accuser and the accused are entitled to the same opportunities to have others present during the disciplinary hearing and
- Both the accuser and the accused shall be informed of the outcome of any disciplinary proceeding based on an allegation of sexual assault.

If requested, Studio Incamminati will work with the victim in making as can reasonably be accommodated relative to the student's academic situation.

11. Sexual Assault and Related Crimes

In the event of a sexual assault or domestic violence, victims should be aware of the following:

- preserve any evidence of the assault (do not drink, bathe, change clothing, or comb hair, as this may destroy evidence that may be needed to prosecute the offender)
- go to a place where it is safe from further attack and notify the police
- obtain immediate medical attention
- seek professional counseling

If requested, Studio Incamminati will assist victims in notifying law enforcement. The Administrative Office will provide information on agencies that provide services to victims of a sex offense.

Studio Incamminati encourages students, faculty, and employees to take advantage of the materials and programs that promote awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses available through the school and/or local community agencies. Information about such materials and programs is available at the school.

12. Registered Sex Offenders

The Jacob Wetterling Act requires states to obtain information concerning registered sex offenders' enrollment or employment at institutions of higher education. Those seeking to obtain information about registered sex offenders should visit the National Sex Offender Public Website www.nsopr.gov. Further, to the extent the Commonwealth of Pennsylvania notifies an educational institution of information concerning registered sex

offenders, the Family Educational Rights and Privacy Act (FERPA) does not prevent educational institutions from disclosing such information.

13. Disciplinary Proceedings

Studio Incamminati will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the school against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the school will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Studio Incamminati does not have a campus police department or security office and therefore does not keep a daily crime log. However, the Administrative Office keeps an updated list of any criminal activity. The Handbook for Campus Safety and Security Reporting is available on line from the Department of Education. This comprehensive publication was used in developing our policies.

14. Crime Statistics for our School for the Past Three Years

CRIMINAL OFFENSES	2016	2017	2018	Location C=Campus N=Non-Campus p=Public Area	HATE CRIMES
Murder/Non-negligent manslaughter: the willful (non-negligent) killing of one human being by another.	0	0	0		0
Negligent manslaughter: The killing of another person through gross negligence.	0	0	0		0
Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by the sex organ of another person, without the consent of the victim.	0	0	0		0

CRIMINAL OFFENSES	2o16	2o17	2o18	Location C=Campus N=Non- Campus p=Public Area	HATE CRIMES
Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental capacity.	0	0	0		0
Incest: Sexual intercourse between two persons who are related to each other within the degrees wherein marriage is prohibited by law.	0	0	0		0
Statutory rape: The sexual intercourse with a person who is under the statutory age of consent.	0	0	0		0
Robbery: The taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.	8	0	0		0
Aggravated assault: The unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm.	1	0	0		0
Burglary: Unlawful entry of a structure to commit a felony or theft.	0	0	0		0
Motor vehicle theft: heft or attempted theft of a motor vehicle.	4	0	0		0
Arson: The willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another.	0	0	0		0
Domestic Violence	0	0	0		0
Dating Violence	0	0	0		0
Stalking	0	0	0		0

Simple Assault	0	3	3	P	0
Forgery	0	0	0		0
Fraud	0	4	0		0
Theft	0	9	14	P	0
Vandalism	1	4	2	P	0
Disorderly Conduct	1	0	0		0
Unfounded crimes: If a reported crime is investigated by law enforcement and is found to be false or baseless, the crime is “unfounded.” Only sworn or commissioned law enforcement personnel may unfound a crime.	0	0	0		0

VIOLATIONS	2016	2017	2018	REFERRED FOR CAMPUS DISCIPLINARY ACTION (Y OR N)
Liquor law violations	0	0	0	
Drug law violations	0	0	0	
Illegal weapons possession violations	0	0	0	

Note: Studio Incamminati was approved for receiving Title IV funds in February 2015 and therefore has not been gathering crime statistics for 2013-2014. Hate crimes cover the following areas of bias: race, religion, ethnicity/national origin, gender, sexual orientation, disability, and gender identity.

15. Hate Crimes

A hate crime is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender’s bias. Bias is a performed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation, ethnicity, or national origin.

Studio Incamminati reports all hate crime statistics separately for the categories of criminal offenses listed in the chart above. Additionally, hate crimes statistics are also reported separately for the following offenses:

- Larceny-theft: is the unlawful taking, carrying, leading, or riding away

of property from the possession or constructive possession of another. Constructive possession is the condition in which a person does not have physical custody or possession but is in a position to exercise dominion or control over a thing.

- Simple Assault: is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- Intimidation: is to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- Destructive/Damage/Vandalism of Property: is to willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

There were no reported hate crimes for the years 2012, 2013, or 2014. Please note that Studio Incamminati has not yet been approved for receiving Title IV funds and therefore has not been gathering crime statistics.

16. Residential Facilities

Studio Incamminati does not have school-operated residential facilities for students. However, the school is required in a manner that is timely and will aid in the prevention of similar crimes and report to students, faculty, and staff on the following crimes:

- Criminal homicide: murder and non-negligent manslaughter; negligent manslaughter
- Sex offenses-forcible and non-forcible
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Theft
- Arson
- Arrests for liquor law violations, drug law violations and illegal weapons possession including persons who were referred for disciplinary action.
- Hate crimes-evidence that shows the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity or disability

- Crimes reported to the Administrative Office or local police and considered by the school to represent a threat to students and employees
- Studio Incamminati is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor. If there is an immediate threat to the health or safety of students or employees occurring on campus, the school will follow its emergency notification procedures.

17. Emergency Response-Campus Community

Beginning October 2010, all Title IV participating institutions must have a statement of policy on emergency response and evacuation procedures.

Studio Incamminati has instituted a plan to notify students, faculty, and staff upon confirmation of a significant emergency or dangerous situation involving an immediate threat to health or safety. An immediate threat encompasses an imminent or impending threat, such as a fire in the building or nearby structure. Employees who perceive an immediate threat toward any other person on the school premises should call emergency 911.

The Administrative Office has set up a text group that will reach all current students, faculty and administration to inform them of any emergency on campus. In addition, an email will be sent to students, faculty, and administration. On specified days, this system will be checked each year.

The evacuation plan is the same as the fire evacuation plan which is posted throughout the building. All personnel will be advised of this plan each year.

Studio Incamminati will without delay, take into account the safety of the community, determine the content of the notification, and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. Faculty and staff members should remain in the room with their students if they are notified of a possible emergency.

An Emergency Committee, consisting of the President, Director of Educational Programming and the Communications Manager will confirm that there is a significant emergency, determine who to notify, content of the notification, and initiate the notification system. The committee will call the Philadelphia Police Department and/or Fire Department as needed.

The Clery regulations define a test as regularly scheduled drills, exercises and appropriate follow-through activities designed for assessment and evaluation of emergency plans and capabilities.

A. A Timely Warning

The Clery Act requires Studio Incamminati to alert students, faculty,

and staff of certain crimes in a manner that is timely and will aid in the prevention of similar crimes. The Clery Act does not define “timely” because the intent of a warning is to enable people to protect themselves and should be issued as soon as the pertinent information is available.

In summary, Studio Incamminati will:

- Confirm there is a significant emergency or threat
- Determine appropriate segment of the building to receive notification.
- Determine the content of the notification
- Initiate notification system
- Include a statement that the school will without delay and accounting for safety of the students, faculty and staff, and determine the content and initiate notification system, unless issuing a notification will compromise efforts to assist a victim or to contain, respond or otherwise mitigate the emergency.
- Include procedures for disseminating emergency information to larger community.
- Include procedures for testing emergency response evacuation on at least an annual basis.

B. Personal Responsibility for Safety

Although Studio Incamminati will make every effort to ensure the safety of its students, faculty, and staff, there is no substitute for common sense, nor can safety procedures be devised to cover every situation. Good judgment must be used in every situation.

The following are the responsibility of individual students, faculty members, and staff:

- Follow approved practices and procedures or standards which apply on any work you perform for the school.
- Report to instructor or Administrative Office any condition which might injure any person or damage any property.
- Any injury which occurs at school, no matter how slight, or any accident that causes damage to property shall be reported immediately to the Administrative Office.
- If anyone observes another who is about to endanger themselves, another person, or property while at the School, they should intervene immediately in such a way as to not endanger themselves.
- Unauthorized alcoholic beverages are not permitted on the school property and use of such is prohibited. No one is to report for work or class evidencing any effects of alcoholic consumption.
- Controlled substances, such as marijuana and cocaine, are illegal by

state and federal law. their use and possession are prohibited on school property.

- Liquids such as water or oil, excessive dust/dirt, or any other debris spilled on floors represent serious slipping hazards and should be cleaned up immediately upon observation.

C. Accident Investigation and Reporting

Any injury occurring at school must be promptly reported to the Administrative Office no later than end of the period on the day in which the injury occurred. All accidents will be investigated to determine the cause and the steps needed to prevent a recurrence. It shall be the responsibility of the instructor to obtain the complete and detailed facts of the accident as soon as possible after it occurs and to see that the required reports are made to the Administrative Office.

D. Firearms

Firearms, ammunition, explosives or other weapons are prohibited on the school property with the exception of law enforcement agencies.

E. Good Housekeeping

Good housekeeping is essential to safe operation. It will result in fewer accidents and will reduce fire hazards. All spills should be cleaned up promptly to eliminate slipping and fire hazards. All work areas must be kept free of debris and other objects which create hazards. Cleaning up the area where you are working is part of the classes.

F. Responsibility

It is the responsibility of everyone to be aware of the hazards related to the use of solvents, chemical cleaning materials, and other chemicals and to enforce the rules related to their use.

Hazards to be considered when using solvents, chemical cleaning materials, and other chemicals are:

- Contact with a hazardous material can cause skin rash or dermatitis, corrosive burns or eye damage.
- Potential explosive or fire hazard.
- The danger of ingestion of a poisonous, corrosive, or hazardous substance through the mouth or absorbed through the skin.

G. First Aid

First aid procedures vary depending on the chemical nature of the materials in question. Follow the instructions on the container label. In the event that a person should come in contact with solvent or chemicals in the eyes or on the skin, the affected area should be irrigated for a minimum of fifteen (15) minutes. If anyone ingests chemical materials or is splashed with a hazardous material and irrigation facilities are not available, they should immediately be

referred to a hospital emergency room.

18. Severe Weather

A. Tornado

If in the judgment of the President or administrator in charge the threat of impending danger warrants it, the following actions may be taken:

- Dismissal of all classes and assembly of students and employees into interior hallways and away from glass windows, doors and partitions.
- Everyone should remain in these “safe” areas until in the opinion of the President the threat of danger is past.
- If the tornado or destructive wind strikes the building, everyone should sit on the floor, with backs against the wall, their heads between their knees, and their hands clasped over the backs of their heads until all danger is past.

B. Flooding

Because of the elevation of the building, the school is not likely to flood. However, during periods of flooding, the President will remain in contact with appropriate authorities and will keep both students and employees advised of local road conditions.

C. Ice and Snow

In the event that ice and/or snow threaten to make highway travel hazardous, the President may dismiss classes to allow students, faculty, and staff to return home safely.

D. Closing the School as the Result of Severe Weather

Only the President has the authority to close the school. When this action is taken, the director will authorize a text message to be sent to the students and faculty. The text message will specify a closing or delayed opening. The information also will be posted on the school’s website home page at ww.studioincamminati.org.

In any event, students, faculty, or staff should not attend school if, in their personal determination or by the warning of law enforcement officials, travel conditions in their area are unsafe or if other circumstances would place their lives/health in jeopardy.

19. Critical Incident Response Plan

A. Objectives

1. To coordinate the School’s response to critical incidents while pay special attention to the safety and security needs of students, faculty, and staff.
2. To maintain the safety and security of faculty, staff and students as a whole in the event of a critical incident.

3. To help provide counseling, guidance, and appropriate support services to the families and friends of students, faculty, and staff in the event of a critical incident.

B. Definition of a Critical Incident

A critical incident is a situation that involves Studio Incamminati that creates a major disruption of normal operations and calls for a response beyond normal school operational procedures. Examples may be situations such as natural/ structural disasters, violent behavior or life-threatening injury or illness. This plan is for general information only. During an actual critical incident, variations might be made depending on the nature of the event and the situation.

20. Student Assistance Services

A. Personal Counseling Referrals

The President will act as the referral agent for student seeking assistance for emotional or personal counseling services.

IV. AMENITIES

1. School Store

A limited number of supplies are available for purchase on-site at the school store located on the 5th floor. Store operation hours are posted on the store door.

2. Reference Library

Purpose

The purpose of the Studio Incamminati Library is to support the mission of the school and augment the learning process of students enrolled in the Advanced Fine Art Program. The library functions as a reference tool for students and faculty, which focuses on relevant periods in art history and provides contextual support for studio learning.

Operation and Use

The library is open for Advanced Fine Art Program students, Monday-Friday from 9 a.m. to 5 p.m. during the school year. Summer hours will vary.

Library books are not permitted to be removed from the school library without advance permission from the administrative office.

The school librarian is responsible for overseeing the maintenance and wellbeing of the library. The library is maintained on a bi-weekly basis by the school librarian. An inventory of the library book collection is conducted annually.

Acquisitions

Books are purchased periodically to support the mission of the school. A priority is placed upon books required or as suggested reading by the faculty and those that support studio classes. Books purchased for the library are subject to review and approval by faculty and administration.

Acquisitions, which support the mission of the school, are accepted through donations. Books donated to Studio Incamminati library will receive acknowledgment in the appropriate books. The Administrative Services Manager is responsible for receiving, labeling and recording into the library inventory and new books that are purchased or donated.

Online Library

Digital library resources (articles and instructor demonstrations) are available online through the Studio Incamminati website. A user name and password will be assigned by office staff.

Additional Resources

The Philadelphia Museum of Art Library is available for use by the students at Studio Incamminati. The PMA Library is a non-circulating research collection open Tuesday through Friday, 10 a.m. to 4 p.m. It is also open Saturdays from mid-September through mid-May. Museum admission is not charged for library users. An orientation for Studio Incamminati students is provided by PMA library personnel.

3. Kitchen

The 5th floor kitchen sink is reserved for food handling only. Dishes, glasses and utensils must be washed after usage, and leftovers and waste disposed of promptly. Perishable items must be removed from refrigerator by date posted on the refrigerator. Items to be saved should be clearly marked with name/date. Unmarked or old items will be disposed of on Friday afternoons.

4. Fitness Center

Students have access to the Wolf Building Fitness Center located on the 4th floor. A waiver must be completed for initial access to the center, and is available by request at the Studio Incamminati office.

5. Wireless Internet Access

Wireless internet access is available for all Advanced Fine Art Program students.

STUDIO FIFTH FLOOR

Password = Sladmin89

STUDIO GUEST

Password = Cerulean Blue

6. Copier

The copier in the administrative office on the 4th floor is available for students with prior office approval. Black and white copies are 10 cents, color copies are 25 cents.

7. Parking

Nearby public parking is available for general rate of \$15 per day. Studio Incamminati does not have an affiliation with a particular lot.

STUDIO INCAMMINATI

SCHOOL FOR CONTEMPORARY REALIST ART

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Studio Incamminati is accredited by the National Association of Schools of Art and Design, licensed by the Pennsylvania State Board of Private Licensed Schools, and recognized as a nonprofit 501(c)(3) organization.

ACADEMIC CALENDAR 2019/2020

2019

September 2 Labor Day (no classes)
3 Fall Semester begins
13 Lecture: Constitution
16 Fall Continuing Education classes begin
16 Lecture: Sexual Violence Prevention-WOAR
1 Lecture: Sexual Violence Prevention-WOAR 8

October 2 Art History Lecture: Cromer

November 3 Fall Continuing Education classes end
6 Art History Lecture: Cromer
22 Fall Continuing Education classes end
28-Dec.1 Thanksgiving Break (no classes)

December 4 Art History Lecture: Cromer
23-Jan.1 Holiday Break (no classes)r

2020

January 13 Winter Continuing Education classes begin
17 Fall Semester ends
18-24 Winter Workshops
27 Spring Semester begins

February 5 Art History Lecture: Cromer

March 4 Art History Lecture: Cromer
29-31 Winter Continuing Education classes end
27 NASAD Site Visit

April 1 Art History Lecture: Cromer
6-10 Spring Break (no classes)
13 Spring Continuing Education classes begin

May 2 Facebook Live Even
13 Art History Lecture: Cromer
25 Memorial Day (no classes)

June 10 Diplomas awarded / Senior Exhibition
12 Spring Semester ends Summer Workshops begin
15 Workshops begin

** Updated Studio calendars will be posted on the 5th floor student bulletin board.

STUDIO INCAMMINATI

SCHOOL FOR CONTEMPORARY REALIST ART

Nelson and Leona Shanks, Founders

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