

Policies
&
Guidelines

2023/2024

Studio Incamminati

SCHOOL FOR CONTEMPORARY REALIST ART

Welcome to Studio Incamminati! All members of the Studio Incamminati community, whether staff, students, or faculty, make vital contributions to our ethos of professionalism, mutual respect, and cooperation. To foster a supportive atmosphere for learning and to provide a clean and safe studio environment, we have instituted the policies and guidelines that are detailed in this handbook. If you need further clarification, the office staff --myself included-- are happy to answer your questions.

With best wishes,

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

Sheila Barker
Executive Director

POLICIES & GUIDELINES CONTENTS

I. General Studio Policies

1. Non-Discrimination
2. Zero Tolerance for Abuse including Bullying, Harassment, & Sexual Harassment
3. Diversity, Equity, and Inclusion
4. Substance Abuse
5. Studio Visitors
6. Noise Pollution
7. Photography
8. Smoking
9. Attendance Policy, Absences/Probation/Dismissal
10. Billing/Refunds
11. Student Grievances
12. Student Evaluations
13. Grading/Satisfactory Academic Progress Policy/Withdrawals
14. Verification
15. Awarding of Title IV, HEA Programs
16. Policy on Return of Title IV Funds When A Student Withdraws
17. Copyright Infringement Policy and Sanctions
18. Family Education Rights and Privacy Act of 1974 (FERPA)

II. Studio Operations

1. Hours of Operation
 - Office and Studio hours
 - Holidays
 - Inclement weather
2. Access/Security
 - Access codes
 - Key
 - After-hours access
 - Property
 - Studio artwork
 - Studio storage
3. Class Procedures
 - Model, Poses
 - Lateness
 - Monitors
 - Food and Drink
4. Closing
 - Personal work area
 - Unclaimed items
 - Closing procedures

III. Health and Safety

1. Materials
 - Approved materials
 - Prohibited items
2. Materials Handling
 - Air quality
 - Solvents
 - Spills
 - Studio sinks
 - Waste Disposal and Recycling
 - Disposal
 - Personal work area
 - Cleaning brushes
 - Solvent recycling
 - and sludge disposal
3. Lighting and Equipment
4. Emergency Evacuation
5. Policy on Bullying, Abuse and Molestation, Intimidation, Sexual Discrimination, Sexual Harassment, and Sexual Violence
6. Title IX Sexual Harassment Policy
7. Faculty / Staff and Student Relationship Policy
8. Social Media Policy
9. Campus Security
10. Personal Safety

11. Reporting a Crime Policy and Conduct
12. Sexual Assault and Related Crimes
13. Registered Sex Offenders
14. Disciplinary Proceedings
15. Residential Facilities
16. Emergency Response-Campus Community
 - Timely Warning Personal Responsibility
 - Accident Investigating and Reporting Firearms
 - Good Housekeeping Responsibility
 - First Aid
17. Residential Facilities
18. Emergency Response – Campus Community
19. Severe Weather Tornado Flooding Ice and Snow
 - School Closing
20. Critical Incident Response Plan Objectives
 - Definition
21. Student Assistance Services Personal Counseling Referrals

IV. Amenities

1. School Store
2. Reference Library
3. Kitchen
4. Wireless Internet
5. Copier
6. Parking

I. GENERAL STUDIO POLICIES

1. Non-Discrimination

Studio Incamminati values diversity and seeks talented students, faculty, and staff from diverse backgrounds. Studio Incamminati does not discriminate based on race, color, sex, sexual orientation, gender identity, religion, creed, national or ethnic origin, citizenship status, age, disability, veteran status, or any other legally protected class status in the administration of its admissions, financial aid, educational or athletic programs, or other University-administered programs or its employment practices. Questions or complaints regarding this policy should be directed to the Executive Director or Chair of the Board of Directors c/o Studio Incamminati, 1901 S. 9th Street, Bok Building 7th Floor, or (215) 592-7910 (Voice).

2. Zero Tolerance for Abuse Including Bullying, Harassment, and Sexual Harassment

Studio Incamminati seeks to preserve a work and learning environment free from abusive, hurtful, and disturbing interactions or behaviors including harassment and sexual harassment. Our policies prohibit all forms of abuse and harassment and identify the resources available to concerned individuals.

This organization has zero tolerance for abuse and will not tolerate the mistreatment or abuse of students in its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or volunteer service. Further, this organization will fully cooperate with law enforcement throughout the investigation and resolution of mistreatment or abuse incidents.

The organization has zero tolerance for abuse, mistreatment, or sexual activity among students within the organization. This organization is committed to providing all students with a safe environment and will not tolerate the mistreatment or abuse of one student by another student. Conduct by student that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the organization will take the necessary steps to eliminate such behavior.

Sexual abuse includes a wide spectrum of interactions with students including rape, certain physical assault, sexual battery, physical sexual contact, sexually explicit or offensive verbal communication, verbal sexual harassment, voyeurism, sexually oriented conversations, sexual intercourse or sexual touching of a student, sexual exploitation, exposing of genitalia, viewing of sexual activity, or permitting, allowing or encouraging a student to engage in prostitution.

Verbal abuse includes language that is degrading or threatening, and includes verbal interactions such as name calling, insults, cursing, derogatory remarks, belittling, and shaming.

Emotional abuse includes conduct that reasonably causes harm to a student's psychological or intellectual functioning, which is exhibited by emotional damage such as severe anxiety, depression, withdrawal, or aggression. Emotional damage may be demonstrated by substantial and observable changes in behavior, emotional response or learning, which are incompatible with the student's age or stage of development. Emotional abuse includes any such conduct or speech involving shaming, humiliation, or cruelty.

The policies on abuse and molestation, harassment, sexual harassment, discrimination, sexual violence are located in Part III, Sections 6 and 7 of this policy manual.

3. Diversity, Equity, and Inclusion

Studio Incamminati vigorously asserts its commitment to eliminating racism and all forms of discrimination and building an anti-racist culture in our community. Studio Incamminati celebrates the rich diversity of persons, groups, and academic and artistic views and opinions expressed by those who make up our community.

Embracing our diversity to strengthen ties across all boundaries enriches the artistic and intellectual climate and creates a more vibrant community. Fostering and nourishing this diversity, especially among students, faculty, staff, and directors, must remain central to the core mission of Studio Incamminati.

We strive for an artistic and educational environment free from racism and discrimination on our campus and in our world. As members of the Studio Incamminati community, we all share deep and mutual responsibility for our engagement, actions, and accountability. Together, we will continue to do the work to make Studio Incamminati a truly welcoming and inclusive school for all.

4. Substance Abuse Policies

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

5. Studio Visitors

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

6. Noise Pollution

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

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

7. 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 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 Director of Marketing and Recruitment 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. Plans must be made with the Director of Marketing and Recruitment 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 copies 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 a case-by-case basis, and requests must be submitted at least one week in advance through the Director of Marketing and Recruitment. Fees may apply and vary for each arrangement; all are at 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. A courtesy copy of all final content shall be provided to Studio Incamminati for its use for internal and promotional purposes.

8. Smoking

Smoking is not permitted at Studio Incamminati or the Bok Building – including roof terraces. Violators are subject to a \$100 fine.

9. Attendance Policy, 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.

Full participation is expected of all Studio Incamminati students and is necessary to fully benefit from and succeed in the SI's Advanced Fine Art Program. *All students are expected to attend classes regularly and promptly and for the full duration of the scheduled class time.* For regular semester classes, students are allowed up to four (4) absences (excused or unexcused) per semester with the caveat that all required work that has been missed due to absence must be made up before the end of the term.

Excessive absences will result in failure or a lowering of grade for the class. After four absences (one-quarter of the semester), students will automatically fail the course and will need to repeat the course the following year. Students who miss more than 4 class sessions will be asked to withdraw from the course and receive a grade of W for the course. Excused or unexcused, it is the student's responsibility to communicate with instructors about missing classes and to arrange for making up any missed assignments. In the case of medical or extenuating circumstances that may prevent a student from attending class for an extended period of time, the student should notify the Administration (the Dean and/or the Chief of Staff/Director of Operations).

10. 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 into 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.edu/programs/financial-aid. Students who withdraw before 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 before the beginning of classes will receive a full refund except for 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 the 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.

For 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 begins.

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. Ninety 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 borrows 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 of funding from the VA.

11. 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 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 contact the Dean of Fine Arts and then the Executive Director.

If the concern pertains to financial aid or billing, please contact the Financial Administrator and then the Executive Director 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 Executive Director at least one month before the board meeting.

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

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 the 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.

12. 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 instructors. The End of Semester evaluations can be done one-on-one or in a group critique format, depending on the instructor's preference. These evaluations and the student's body of artwork produced in class determine the retention and advancement status of students into the next semester/level/year.

13. 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.

Studio Incamminati has 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 Operations or Dean of Fine Arts 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 the disbursement of aid. The SAP 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 – December

Spring Semester - May

Informal (non-binding) written evaluations are also conducted at the midsemester point: Fall Semester – October. Spring Semester – March. 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.

Because written evaluations are non-binding, they enable students to effectively address inadequacies in learning performance. Students who fall well below the qualitative standards receive a Midterm Academic Warning. 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 32 weeks of instructional time.

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

Studio Incamminati's SAP policy contains a measure of the 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

All students are expected to complete the curriculum ideally within four years of full-time enrollment. To be considered to have achieved 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 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 these 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 a 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.

If, after the equivalent of 6 years of full-time enrollment (150% of the normal timeframe), any student is still unable to meet SAP or GPA standards, the student's portfolio of work will be reviewed by an ad hoc committee formed by the Level Chairs and the Dean of Fine Arts to determine whether dismissal from the program is merited or whether the student may be allowed to continue under conditions determined by the committee. These conditions may include either a period of probation to be followed by automatic readmission or, as an alternative, a period of probation to be followed by the possibility of readmission solely at the discretion of the admissions committee on the basis of a new application from the student.

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 Operations monitor qualitative progress.

GRADE	POINTS	DESCRIPTION
A	4.00	Exceptional proficiency, the highest level of work
A-	3.70	High proficiency in all course objectives
B+	3.30	Great work, demonstrates proficiency well above average aptitude
B	3.00	Very good work, consistently more than proficient in all course objectives
B-	2.70	Good work comprehends and reliably achieves a majority of course objectives.
C+	2.30	Satisfactory work comprehends and demonstrates proficiency in some course

objectives

C	2.00	Minimal passing work
F	0.00	Failure: deficiency in subject matter
I	0.00	Incomplete
W	0.00	Withdrawal

E. Academic Warning

Studio Incamminati evaluates student academic performance at the midterm point of each semester. This is done through written midterm evaluations with each instructor. Students who fail to meet either the Quantitative and/or Qualitative measures of SAP by not producing work of sufficient proficiency are identified as "Not Making SAP." Students Not Making SAP receive an Academic Warning from the Dean of Fine Arts for the specific course in which the danger of failure exists. Academic Warnings enable students to effectively address inadequacies in learning performance. Students are urged to take measures, under the guidance of their instructors, to improve academic performance. Students are encouraged to seek clarification from their Faculty, the Operations Director/Chief of Staff, and/or the Dean of Fine Arts. Students who face an Academic Warning are provided with links to the applicable section(s) of the School Catalogue or Policies and Guidelines Handbook and offered additional consultation with the Dean of Fine Arts.

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. Academic Failure

Students who do not demonstrate improvement at the end of the Academic or Financial Aid Warning period will fail the course, particularly students who fail to maintain a grade of 2.0 or higher. These students will be required to repeat the course in order to earn credit for the academic failure. These students will also be placed on Academic Development Status and have the right to appeal that status. Students review the status of their Title IV HEA financial aid with the Financial Administrator.

H. 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.

Students have three (3) business days after being notified to submit an appeal. The appeal must be in writing and given to the Executive Director, who will meet with the Financial Aid Academic Appeals Committee to decide on the appeal. The basis on which a student may file an appeal is

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 Executive Director will provide a decision in writing within five (5) business days.

I. 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.

J. 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.

K. Course Incompletes, Withdrawals, Repetitions, and Transfer Credits

Students who withdraw and re-enroll will return to 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.

Transfer credit may be awarded for courses completed at regionally accredited institutions that are similar in content and of comparable standards to those offered at Studio Incamminati. Course descriptions and/or syllabi may be requested to ensure proper evaluation.

Credits transferred from other institutions become part of the academic record. However, grades from other institutions will not be recorded on the transcript, nor will they be used in determining the student's grade point average.

Applicants are provided with a preliminary transfer credit evaluation at the time of admission. The final award of transfer credit and level determination are subject to receipt and verification of official final transcripts and portfolio evaluation by Studio Incamminati. If final transcripts are not received by the advising period of the student's second semester of attendance, pending transfer credit will be removed.

The following criteria must be met for coursework to be evaluated for transfer:

- A **grade of C or better** is required to transfer credits from other institutions. A C-grade **will not** be accepted by Studio Incamminati.

- The course must be **equivalent** to a course offered by Studio Incamminati.
- Coursework must have been **completed within the past ten years** to be eligible for transfer credit.
- A maximum of twenty-four (24) semester credits will be accepted for transfer credit.

Official Withdrawal from School

Students who withdraw from the school must consult with the Executive Director and/or Director of Operations 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 Executive Director and/or Director of Operations 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.

14. Verification

Each year, the U.S. Department of Education requires schools participating in 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 from 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 if 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 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 August 1, 2022, 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. 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 signed on Part 2 of the SAR, a signed copy of the correction, an 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 acknowledgment 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 Tamara Stokes, Financial Administrator at Studio Incamminati. The FA 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 the 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

15. Awarding of Title IV, HEA Programs

Students cannot default on any previous student loans and/or do not owe a refund on a grant from another school 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 the need. There is no interest while the student is in school. Interest and repayment begins six 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 the 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, Tamara Stokes, 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.

16. 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 cease 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, which varies depending on the type of withdrawal. For 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. For 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, 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 of 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 the 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 a class before the Leave began. Therefore, for students enrolled in credit hour term programs for an LOA to be an official LOA, a school must allow a student returning from an 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 Operations 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, for students who subsequently drop out, the withdrawal date is the original date of notification of intent to withdraw.

Upon receipt of the withdrawal information, 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 the 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, and

scheduled attendance and are based upon the payment period.

- b. Calculate the school's refund requirement (see school refund calculation).
3. The 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.

Supply the student with a ledger card record noting the 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 intend 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 returned 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 recorded on the 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 is based on the length of time the student was enrolled and scheduled to attend 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 a final student ledger card showing the 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 the 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 the calculation. 19 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) 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 of 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 identifying 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 regard 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 regard to the 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 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 Operations or Executive Director.

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 School Catalog and the 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 at www.studentaid.ed.gov.

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

17. 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 distribute 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 the 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 America.

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/>

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

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

- 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 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 that provides that schools will maintain the confidentiality of student education records. The law says that no one outside the institution shall have access to student's 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 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 the release of directory information.

Parental Access to Children's Education Records

At the postsecondary level, parents have no inherent right 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, duties, and responsibilities of the position. Any requests for disclosure of information from inside or outside the school must be referred to the Executive Director. 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 has permitted disclosure of information before 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 the 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 the 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 4:30 p.m. for day classes and 6 p.m. to 9 p.m. for evening classes. Lunch break is from 12:30 to 1:30 p.m.

Studio Incamminati's studio spaces can be accessed from 7 a.m. to 10 p.m. on both weekdays and weekends. With no exceptions, the premises of Studio Incamminati must be vacated by 10 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.edu

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 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.

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

During daily class sessions, Studio Incamminati students are encouraged to enter other-level classrooms in order to learn from fellow students. *This must only be done during model breaks.* Monitors for each level should keep the doors to their classrooms open during the 7-minute model breaks (and closed while the models are posing) so that students recognize the appropriate time to enter or exit classrooms. Students who are not in a specific level class should refrain from entering that classroom while the model is posing. This will protect the *privacy of our models* as well as create a less distracting learning environment.

Students must remember to respect the studio space while walking into/out of a classroom. Many students remain highly engaged in their work even while on break. Silencing phones and promptly exiting the space when the model returns to posing is *required*. If conversations between instructors and visiting students commence, discourse should be considerate, audibly, of the concentrated atmosphere of the classroom. With respect to classroom operations, any prolonged conversations should spill over into the corridors in order to prevent distractions or interruptions in model time.

Students must continue to respect our policy of waiting until break time to enter, reenter, or exit the studios during class hours.

Faculty and staff will still need to gain access to studios during model poses for a variety of reasons: to retrieve an item or necessary piece of equipment, connect/coordinate with a colleague, or deal with a situation involving a student. Staff will bring the occasional school visitor into your classrooms, always respecting the conscientious tone you set and the model's privacy within classes. Studio Incamminati's Operations Manager may be in and out more often than most because the Operations Manager is the direct contact with building maintenance and often deals with pressing infrastructure issues.

The school maintains its dedication to educational autonomy. A teacher inviting students from another class into their classroom to observe a demo or presentation for the full 20 minutes or for several poses is part of that autonomy.

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 contact Studio Incamminati 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 enforcing the timing for model breaks. Monitors also ensure that all electrical equipment, such as model heaters, are powered off and unplugged at the conclusion of each pose. Concerning the pose, the monitor has the final say on the position of the model, lighting, and easel placement. Monitors report to both the Instructor as well as the Operations Director. Monitors are an important conduit to the administration in case of emergencies.

Food is prohibited throughout all of the studio areas. (This applies to students, instructors, workshop/evening program artists, and models.) Drinks are permitted only in 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 anywhere on the premises of Studio Incamminati, both indoors and outdoors, as well as anywhere indoors within Building Bok: turpentine, varnishes containing turpentine, spray fixative, all forms of "Workable Fixatif," 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. Solvents must never be placed upon any heating unit, including radiators. 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.

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 cans. 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 solvents, 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 it 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 recycling containers located throughout the studio.

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

4. Lighting and Equipment

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 are prohibited from being hung on any fire suppression system pipes.

The use of boom lights involves laying sandbags along their base for stabilizing this equipment as well as counterweighing the light assemblies with their attached bags. Tightening the hardware within the assembly may be necessary, so routine checks on the hardware are crucial to best practice. This equipment has been retained for color still-life purposes and should not be utilized with a live model. Please operate with an abundance of caution when employing this type of equipment.

Extension cords are often used with a model and should be recognized as potential tripping hazards. Please use them with caution and alert others to their location.

Ladders may be employed for moving lights along and throughout the ceiling scaffolding in each studio. Ladders can be hazardous if mishandled: Please use caution when climbing ladders and do so only if necessary. Once handled, ladders must be stored with care and placed in designated studio areas; improper storage of ladders can render them unstable and lead to failure and falls. Ask an administrator for help if there is any doubt. Artwork must never be done while on a ladder.

5. Emergency Evacuation

The following is the Bok 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 the doors behind you. Proceed into the fire exit and leave the building by the stairs. Do not use the elevators. Fire exits are clearly marked at each end of the Main Corridor and the junction of the Main and Central Corridors.

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 your 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. Title IX Sexual Harassment Policy: Policy Regarding Sexual Harassment, Sexual Assault, Dating and Domestic Violence, and Stalking

A. Policy Statement and Purpose

This policy was drafted in accordance with Title IX of the Education Amendments of 1972, a law that prohibits any person in the United States from being discriminated against on the basis of sex in seeking access to any educational program or activity receiving federal financial assistance. Acts of sexual harassment, sexual assault, dating and domestic violence, and stalking are considered forms of sex-based discrimination and are prohibited by law and School policy. Studio Incamminati is committed to fostering a safe and productive learning and work environment that is free from acts of all forms of sex-based discrimination.

In May 2020, the U.S. Department of Education issued a Title IX Final Rule that defined types of sexual harassment covered by Title IX, clarified requirements for institutional response to reports of Title IX sexual harassment, and mandated a specific grievance process that must occur prior to any disciplinary action being taken against a person accused of Title IX sexual harassment. This policy was drafted in accordance with the Title IX Final Rule and applies *only* to conduct that meets the specific definitions and criteria per the Title IX Final Rule. All other forms of sex-based discrimination are governed by other relevant School policies.

The purpose of this policy is:

- To educate the School's community on the definitions of Title IX sexual harassment,

- To outline resources available to those who may have been impacted by an act of Title IX sexual harassment,
- To describe the procedures followed when the School receives a report of Title IX sexual harassment,
- To define the rights and responsibilities of parties and witnesses involved in a formal complaint of Title IX sexual harassment.

B. 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 students¹.
- This policy applies to conduct that occurs in Studio Incamminati’s “education program or activity,” which includes:
 - Any on-campus premises,
 - Any off-campus premises that Studio Incamminati has substantial control over, including buildings or property owned or controlled by a recognized student organization and
 - Activity occurring within computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of Studio Incamminati’s programs and activities over which Studio Incamminati has substantial control.

C. Title IX Sexual Harassment

For purposes of this policy, “Title IX sexual harassment” includes any conduct on the basis of sex meets one or more of the following definitions:

- Quid pro quo sexual harassment: an employee conditioning educational benefits on participation in unwelcome sexual conduct
- Hostile environment sexual harassment: unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the educational institution’s education program or activity.
- Sexual assault (as defined in the Clery Act): any sexual act directed against another person without the consent of the victim, including instances where the victim is incapable of giving consent. Types of sexual assault, according to the Clery Act definition, include:
 - Rape
 - Fondling
 - Incest
 - Statutory Rape
- Dating violence (as defined in the Violence Against Women Act amendments to the Clery Act): any violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim, and where the existence of such a relationship shall be determined based on the reporting party’s statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating violence includes but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.
- Domestic violence (as defined in the VAWA amendments to the Clery Act): any felony or

¹ For purposes of this policy, “student” is defined as an individual who is currently enrolled in Studio Incamminati or who has accepted admission to Studio Incamminati.

misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitation with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the Commonwealth of Pennsylvania, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the Commonwealth of Pennsylvania.

- Stalking (as defined in the VAWA amendments to the Clery Act): engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the safety of others or suffer substantial emotional distress. For purposes of this definition under the VAWA amendments to the Clery Act:
 - “course of conduct” means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property,
 - “reasonable person” means a reasonable person under similar circumstances and with similar identities to the victim and
 - “Substantial emotional distress” means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

D. Statement on Consent

Consent to engage in sexual activity must be known 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 can be withdrawn at any time. Consent to one instance of sexual activity does not imply consent to future instances of sexual activity. Consent is active, not passive. Incapacitation may result from the use of alcohol and/or drugs.

E. Statement on 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 covered sexual harassment. Retaliation may include, but is not limited to, intimidation, threats, coercion, or discrimination against any such individual. Allegations of retaliation will be addressed as separate from and in addition to any related allegations of Title IX sexual harassment and may result in subsequent disciplinary proceedings. Concerns of retaliation should be reported immediately to the Title IX Coordinator.

Intimidation, threats, coercion, or discrimination, including charges against an individual for policy violations that do not involve Title IX sexual harassment but arise out of the same facts or circumstances of a report or complaint of Title IX sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX or this policy, constitutes retaliation.

F. Relevant Definitions

- Complainant: an individual who is alleged to have been a victim of conduct that could constitute Title IX sexual harassment.
- Respondent: an individual who has been reported to be the perpetrator of conduct that could

constitute Title IX sexual harassment.

- **Formal Complaint:** a document filed by a complainant or signed by the Title IX Coordinator alleging Title IX sexual harassment against a respondent and requesting that the School investigate the allegation of Title IX sexual harassment. At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the education program or activity of the School. A formal complaint may be filed with the Title IX Coordinator in person, by mail, or by electronic mail using the contact information listed in section K below. Where the Title IX Coordinator signs a complaint, the Title IX Coordinator is not a complainant or otherwise a party to the matter.

G. Title IX Coordinator

Studio Incamminati designates Tamara Stokes, Financial Administrator, as the Title IX Coordinator. The Title IX Coordinator oversees Studio Incamminati's centralized review, investigation, and resolution of reports of covered sexual harassment. The Title IX Coordinator also coordinates Studio Incamminati'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 Studio Incamminati, both informally and formally;
- available to provide assistance to employees regarding how to respond appropriately to reports of covered sexual harassment and
- responsible for monitoring full compliance with all requirements and timelines specified in the complaint procedures.

Additionally, the Title IX Coordinator must remain free from conflicts of interest and bias and be trained in how to serve impartially and avoid prejudgment of the facts at issue.

Information for the Title IX Coordinator can be found below.

H. Emergency Assistance

If emergency assistance is needed after you or someone you know has experienced either Title IX sexual harassment or another form of misconduct, call 911 immediately.

After an incident of physical violence, including sexual violence, it is important to seek medical care and to be treated for injuries, as well as tested for pregnancy and sexually transmitted diseases. For this purpose, Philadelphia has created the Philadelphia Sexual Assault Response Center (PSARC), located at 300 E. Hunting Park Avenue, Philadelphia, PA 19124. PSARC can be reached via phone at 215-685-3251 or 215- 800-1589.

In addition to providing medical care, PSARC offers forensic exams completed by specially trained and certified Sexual Assault Nurse Examiners (SANE). A forensic exam 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 and will not be billed to the victim or the insurance company. Forensic evidence can be collected up to 96 hours after an assault has occurred.

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.

I. Confidential Resources

There are many local and national resources that offer confidential and free services to survivors of Title IX sexual harassment. We encourage community members to access these resources:

- **Philadelphia Center Against Sexual Violence (WOAR):** 215 985-3333 (24-hour hotline)
- **National Sexual Assault Hotline:** 1-800-656-4673 (24-hour hotline)
- **The Philadelphia Domestic Violence Hotline:** 1-866-723-3014 (24-hour hotline)
- **National Domestic Violence Hotline:** 1-800-799-72 (24-hour hotline)

J. Officials With Authority

Studio Incamminati designates certain employees as “Officials With Authority,” meaning those who have the authority to institute corrective measures on behalf of Studio Incamminati. Though all Studio Incamminati employees and other community members are encouraged to report Title IX sexual harassment to the Title IX Coordinator, only those reports to Officials With Authority place Studio Incamminati on notice of Title IX sexual harassment and trigger Studio Incamminati’s obligation to respond.

Studio Incamminati Officials with Authority are:

Title IX Coordinator, Tamara Stokes

Executive Director, Sheila Barker

Chief of Staff/Dir of Operations, Dan Mahlman

Should the complainant or a reporting party wish **not** to place Studio Incamminati on official notice of the allegations and not trigger the University’s obligation to respond, they may discuss their concerns confidentially with the individuals or offices referenced above under Confidential Resources.

K. Reporting Title IX Sexual Harassment to Studio Incamminati

Any person may make a report of Title IX Sexual Harassment to Studio Incamminati. Such reports may be made in addition to, or in lieu of, a report to law enforcement. To make a report of Title IX Sexual Harassment to Studio Incamminati, contact:

Title IX Coordinator Tamara Stokes: 215 592 7910, tstokes@studioincamminati.edu

Anonymous reports may be made by leaving a written request for assistance in a sealed envelope in the mailbox of Title IX Coordinator Tamara Stokes.

Following all reports of Title IX sexual harassment, the Title IX Coordinator will provide information about supportive measures available to individuals who may have experienced harm, as well as information about procedural options. Such information will be provided in writing, and the Title IX Coordinator will be available to meet in person to provide additional information and answer questions.

L. Amnesty for Reporting Title IX Sexual Harassment

Studio Incamminati recognizes that a student who has been drinking or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for their own conduct. A student who reports Title IX sexual harassment will not be subject to disciplinary action by Studio Incamminati for their personal consumption of alcohol or drugs at or near the time of the incident. The School may, however, initiate an educational discussion or pursue other educational remedies regarding alcohol or other drugs. Amnesty for a student who reports Title IX sexual harassment may extend to other violations of School policy, provided that any such violations did not and do not place the health or safety of any other person at risk.

M. Supportive Measures

Individuals who have experienced Title IX sexual harassment are entitled to reasonable supportive measures, which are individualized services to restore or preserve equal access to education, protect student and employee safety, or deter sexual harassment. Supportive measures may include counseling referrals, academic modifications (such as assignment extensions or modifications to coursework or schedule), housing modifications, leaves of absence, and campus safety measures. Supportive measures are offered to any community member who reports that they have experienced Title IX sexual harassment, even if that person does not wish to initiate or participate in a formal grievance process.

N. Emergency Removal and Administrative Leave

Studio Incamminati may remove a student respondent from the education program or activity on an emergency basis, where Studio Incamminati (1) undertakes an individualized safety and risk analysis and (2) determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of covered sexual harassment justifies a removal. If Studio Incamminati determines such removal is necessary, the respondent will be provided notice and an opportunity to challenge the decision immediately following the removal.

Studio Incamminati retains the authority to place a non-student employee respondent on administrative leave during the investigation and resolution process, consistent with other applicable employment policies.

O. Formal Grievance Process

- **Filing a Formal Complaint:** To file a formal complaint, a complainant must provide the Title IX Coordinator with a written, signed complaint describing the facts alleged. Complainants are only able to file a formal complaint under this policy if they are currently participating in, or attempting to participate in, the education programs or activities of Studio Incamminati, including as an employee. If the complainant does not wish to file a formal complaint, the Title IX Coordinator may determine that a formal complaint is necessary and will sign a formal complaint on behalf of the complainant. If the Title IX Coordinator signs the formal complaint, the Title IX Coordinator is not acting as a complainant or party to the matter.
- **Advisors:** Complainants and respondents are entitled to an advisor of choice throughout the formal grievance process. Advisors may be, but are not required to be, attorneys. Advisors play a non-speaking supportive role throughout the process, with the exception of conducting cross-examination during the live hearing.
- **Time Frame:** The time frame for resolution of a matter begins upon the filing of a formal complaint and should be concluded in a matter of ninety (90) calendar days. The process may be extended for a reasonable amount of time given the availability of the parties, advisors, and witnesses, closure for holidays, and so on.
- **Notice of Allegations:** The parties will receive the notice of allegations as soon as practicable after Studio Incamminati receives a formal complaint of allegations. The parties will be notified by their School email accounts if they are a student or an employee. The notice of allegations will include a copy of this policy describing the grievance process, notice of the allegations of potentially constituting Title IX sexual harassment (including sufficient details known at the time the notice is issued), a statement that the respondent is presumed not responsible for the alleged conduct, and a statement that the parties may have an advisor of choice who may be, but is not required to be, an attorney. Should additional allegations be made known during the course of the investigation, the parties will receive a notice promptly, in writing, of updated allegations.
- **Determining Jurisdiction:** The Title IX Coordinator will determine if the formal grievance process should apply to a formal complaint submitted under this policy. The process will only apply when all of the following elements are met, in the reasonable determination of the Title IX Coordinator: (1) The report is received by Studio Incamminati or Studio Incamminati has actual knowledge of the conduct on or after August 14, 2020; (2) The conduct is alleged to have occurred in the United States; (3) The conduct is alleged to have occurred in Studio Incamminati's education program or activity; and (4) The alleged conduct, if true, would constitute Title IX sexual harassment as defined in this policy. If all of the elements are met, Studio Incamminati will investigate the allegations according to the formal grievance process. If one or more of the elements are not met, the Title IX Coordinator will notify the parties that the formal complaint is being dismissed for the purposes of Title IX. Dismissal of a formal complaint under the formal grievance process does not affect the School's ability or discretion to address any alleged misconduct under other School policies.
- **Discretionary Dismissal:** The Title IX Coordinator may dismiss a formal complaint brought under the formal grievance process or any specific allegations raised within that formal complaint at any time during the investigation or hearing if: (1) A complainant notifies the Title IX Coordinator in writing that they would like to withdraw the formal complaint or any allegations raised in the formal complaint; (2) The respondent is no longer enrolled or employed by Studio Incamminati, or (3) If specific circumstances prevent Studio Incamminati from gathering evidence sufficient to reach a determination regarding the formal complaint or allegations within the formal complaint. The Title IX Coordinator will notify the parties promptly, in writing, of any dismissal under this section.
- **Investigation:** Investigations will be conducted by experienced individuals who do not have a

conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent. Investigators receive extensive training on how to conduct investigations of Title IX sexual harassment and how to create an investigative report that fairly summarizes relevant evidence. Parties will be given written notice of the date, time, location, participants, and purpose of all investigative meetings with sufficient time to prepare. Parties are entitled to be accompanied by their advisor at any meeting regarding the investigation.

- **Inspection and Review of Evidence:** At the conclusion of the investigation, the investigator will prepare a draft investigative report that fairly summarizes all relevant evidence. The investigator may redact irrelevant information from the investigative report when that evidence is contained in documents or evidence that is/are otherwise relevant. The parties will be given an equal opportunity to inspect and review the draft investigative report and any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence that the School does not intend to rely on reaching a determination regarding responsibility, and inculpatory or exculpatory evidence whether obtained from a party or other source. The investigator will send the draft investigative report and evidence to each party and the party's advisor. The parties will then have ten (10) business days to submit a written response to the investigator, which the investigator will consider prior to the completion of the investigative report.
- **Investigative Report:** A final investigative report that fairly summarizes relevant evidence will be sent to each party and the party's advisor at least ten (10) business days prior to the live hearing. The report will be shared in an electronic format or hard copy.
- **Hearing Officer:** A hearing officer will be designated by Studio Inacaminati to preside over the live hearing. The hearing officer cannot be the same person(s) as the Title IX Coordinator or the investigator(s) and may not have a conflict of interest or bias.
- **Live Hearing:**
 - The live hearing will be conducted with all parties physically present in the same geographic location or, at the School's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually through the use of videoconferencing technology.
 - The only individuals entitled to be present at the live hearing are the parties and the parties' advisors, the Title IX Coordinator, witnesses, and the hearing officer.
 - The parties cannot waive their right to a live hearing. The School may still proceed with the live hearing in the absence of a party and may reach a determination of responsibility in their absence. However, the hearing officer cannot draw an inference about the determination regarding responsibility based solely on a party's absence from the live hearing or refusal to answer cross-examination or other questions.
 - If a party does not attend the live hearing, the party's advisor may appear and conduct cross-examination on their behalf. If neither a party nor their advisor appears at the hearing, the School will provide an advisor to appear on behalf of the non-advising party.
 - Each party's advisor will conduct a live cross-examination of the other party and witnesses. Before any cross-examination question is answered, the hearing officer will determine if the question is relevant. Cross-examination questions that are duplicative of those already asked may be deemed irrelevant if they have been asked and answered by the advisor or the hearing officer.
 - The parties are permitted to prepare opening and closing statements, but they are prohibited from asking questions on cross-examination of other parties and witnesses.
 - Studio Inacaminati will create an audio or audiovisual recording, or transcript, of any

live hearing and make it available to the parties for inspection and review.

- For a description of the live hearing procedures, please see Appendix A.
- **Standard of Proof:** The preponderance of the evidence standard will be used for all matters under the formal grievance process. A preponderance of the evidence means that, based on the relevant evidence available, it is *more likely than not* that a policy violation occurred.
- **Determination Regarding Responsibility:** The hearing officer will issue a written determination regarding responsibility, applying the preponderance of the evidence standard. The determination will include (1) Identification of the allegations potentially constituting Title IX sexual harassment as defined by this policy; (2) A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notification to the parties and witnesses, site visits, methods used to gather other evidence, and hearings held; (3) Findings of fact supporting the determination; (4) Conclusions regarding the application of Studio Incamminati's policy to the facts; (5) A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions Studio Incamminati imposes on the respondent, and whether remedies designed to restore or preserve equal access to Studio Incamminati's education program or activity will be provided by the recipient to the complainant; and (6) Studio Incamminati's procedures for appeal. The written determination will be provided to the parties simultaneously in writing.
- **Appeal:** Complainants and respondents are entitled to appeal any determination regarding responsibility and any dismissal of a formal complaint. Appeals may be made only on the following grounds: (1) Procedural irregularity that affected the outcome of the matter; (2) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter; and (3) the Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter. Appeals will be reviewed by an appeal officer designated by Studio Incamminati who does not have a conflict of interest or bias in the matter and who has not served as the hearing officer, the investigator(s), or the Title IX Coordinator.

P. Record Retention

Studio Incamminati will maintain, for a period of seven (7) years, records of each Title IX sexual harassment investigation, including any determination regarding responsibility and any audio or audiovisual recording or transcript of a live hearing, any appeal and the result therefrom, any informal resolution and the result therefore, and all materials used to train Title IX Coordinators, investigators, hearing officers, and any person who facilitates an informal resolution process.

Q. 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 sanctions.

Students

- **Disciplinary Warning:** Notice to the student, orally or in writing, that continuation or repetition of the conduct found wrongfully 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 the 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.

R. 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 resolve the complaint. 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>

7. Interactions and Relationships Between Faculty, Staff and Students

Introduction

Studio Incamminati is committed to providing all community members with a safe, equitable, and hospitable academic and work environment. When threats to this environment arise, we follow a Critical Incident Plan (Appendix 1).

Our organization's physical contact policy promotes a positive, nurturing environment while protecting students, employees, and volunteers.

Our organization prohibits inappropriate physical contact. Any inappropriate physical contact by employees or volunteers towards students will result in disciplinary action, up to and including termination.

Our organization prohibits bullying and intimidation. Employees and volunteers are prohibited from speaking to students in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees and volunteers must not initiate sexually oriented conversations with students. Employees and volunteers are not

permitted to discuss their own or others' sexual activities with students. Our organization's policies for inappropriate verbal interactions include but are not limited to: name-calling; speaking pejoratively about a student, faculty member or staff member in front of students; keeping secrets among a small group; cursing; telling off-color jokes; shaming or belittling a student; ignoring a student; oversharing personal information; derogatory remarks about a student or a group they identify with; harsh language that could frighten, humiliate, intimidate or threaten students; comments relating to a person's appearance or mental health.

Our organization prohibits sexual, romantic, or economic relationships between Incamminati students and staff/faculty. Because these parties hold unequal positions of power or authority, relationships of these kinds undermine this commitment and raise significant legal, administrative, and ethical risks. For purposes hereof, an "economic" relationship includes any of the following: landlord-tenant, employer-employee, lender-borrower, and creditor-debtor.

There are many ways problems can arise when Incamminati students and staff/faculty in unequal positions of power engage in a sexual, romantic, or economic relationship. When one person can grade, advance, promote, recommend, or otherwise influence the employment or academic status of the other, there is the possibility that what appears to be a consensual relationship is not so. Some recipients of sexual advances may fear that refusal will result in loss of employment or academic benefit and thus enter into such a relationship even though it is, in fact, unwelcome. Such situations may constitute sexual harassment, which is illegal.

The person in the position of greater authority who may desire a sexual, romantic, or economic relationship also has strong reasons to avoid it since what seems initially consensual turns out to be unwelcome or coercive from the perspective of the participant with less power. The fact that a relationship was initially consensual or that the person with greater power genuinely thought it was consensual does not insulate that person from a sexual or other harassment grievance or lawsuit.

Even when such a relationship is genuinely consensual (and therefore does not constitute unlawful harassment or conduct), the relationship can cause problems for both parties and harm the academic and work environment at Incamminati. There is the appearance and often the reality of a conflict of interest on the part of both parties to the relationship, and the relationship could lead to damaging claims or concerns of favoritism or exploitation.

Accordingly, Incamminati has established this Policy to protect the members of its community and the integrity of its academic and work environment from the conflicts of interest and disruptions that can arise from consensual sexual, romantic, or economic relationships involving Incamminati students and staff/faculty in unequal positions of power or authority.

Policy

No faculty, fellow, or staff member shall enter into a sexual, romantic, or economic relationship with a current student. Conversely, no faculty or staff member shall exercise direct authority over a student with whom the faculty or staff member previously had a sexual, romantic, or economic relationship.

Additionally, no student serving in a teaching or evaluative role for a specific course (e.g., as a teaching assistant or teaching associate) shall enter into a sexual, romantic, or economic relationship with any student enrolled in that course. Conversely, no student serving in a teaching or evaluative role for a specific course shall exercise academic authority over any student in that course with whom he or she currently has or previously had a sexual, romantic, or economic relationship.

If any of the above situations preexist or arise, the party in the position of greater authority must promptly recuse him or herself from any role with direct authority over the other party and disclose the situation to the school in accordance with the disclosure, conflict of interest, code of conduct and other applicable policies in effect at the time.

Sanctions

Failure to comply with this Policy governing staff/faculty and student sexual, romantic, or economic relationships will result in severe disciplinary action up to and including dismissal, depending on the particular situation, as well as any legal costs that the school may incur as a result of the signatory's non-compliance with this policy.

8. 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 the 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 and 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's 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 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 they 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 employees' 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 (e.g., 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 and 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, 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.

9. Studio Incamminati Campus Security

Security in our studios is handled by the Administrative Office in cooperation with the Bok 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 3rd District for the Philadelphia Police Department, 1300 S. 11th Street, Philadelphia, PA 19147, 215-686-3030 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 Building Bok, 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 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.

10. 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 the 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 who is not a 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.

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 may be 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, works with local law enforcement agencies, and refers criminal incidents to the local police department having jurisdiction over such matters.

The Executive Director 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 that crime information not reported to the Administrative Office 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 in school facilities or at school-sponsored events. This includes acts of violence against women.

Individuals who counsel 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](http://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 online from the Department of Education. This comprehensive publication was used in developing our policies.

14. 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 crime statistics are also reported separately for the following offenses:

- Larceny-theft: 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: 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: 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.

15. 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 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.

16. 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 Executive Director, Director of Operations, and the Director of Marketing and Recruitment will confirm that there is a significant emergency, determine who to notify, the 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 the 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 the 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 the safety of the students, faculty, and staff, determine the content and initiate a 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 a 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 responsibilities of individual students, faculty members, and staff:

- Follow approved practices and procedures or standards that apply to any work you perform for

the school.

- Report to the instructor or Administrative Office any condition which might injure any person or damage any property.
- Any injury that 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 the 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. Hazardous Materials

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 rashes, 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.

17. Severe Weather

A. Tornado

If, in the judgment of the Executive Director 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 Executive Director, the threat of danger is past.
- If the tornado or destructive wind strikes the building, everyone should sit on the floor with their 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 Executive Director 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 Executive Director 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 Executive Director 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.edu.

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.

18. Critical Incident Response Plan

A. Objectives

1. To coordinate the School’s response to critical incidents while paying 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.

19. Student Assistance Services

A. Personal Counseling Referrals

The Executive Director and/or Chief of Staff/Director of Operations will act as the referral agent for students seeking assistance for emotional or personal counseling services.

IV. AMENITIES

School Store

A limited number of supplies are available for purchase on-site at the school store located in room 715. Store hours are posted on the door.

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 enrolling in the Advanced Fine Art Program as well as the BFA articulation with Rowan University. 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 students Monday to Friday from 9 am to 5 pm during the academic year. Summer hours will vary but will be generally available during regular business hours. Library books are not permitted to be removed from the school library without permission from the Administrative staff.

The school librarian is responsible for overseeing the maintenance and well-being of the library. An inventory of the library's collection is conducted annually at the close of the academic year.

Acquisitions

Books are purchased periodically to support the mission of the school. A priority is placed on books required or, as suggested, reading by faculty and those that support studio classes. Books purchased for the library are subject to review and approval by faculty and administration. Acquisitions that support the mission of the school are accepted through donations. Books donated to the Studio Incamminati library will receive acknowledgment in the appropriate books. The Director of Operations is responsible for receiving, labeling, and recording the library inventory and new acquisitions.

Additional Resources

Philadelphia Museum of Art

Students and faculty are welcome to use the library of the Philadelphia Museum of Art. The PMA Library is a non-circulating research collection. Museum admission is not charged for library users. An orientation for Studio Incamminati students and faculty to the library is provided by the PMA Library personnel by arrangement. <https://philamuseum.org/library/>

Temple University Library

Studio Incamminati students and faculty can visit Temple University's Charles Library to use the facilities or conduct research using their print book collection. Visitors to the Charles Library can connect to their guest campus network as well as access the library's databases and ebook

collections. That information is shared on this page: <https://library.temple.edu/policies/guest-alumni-access-to-computers-online-databases>

Students and faculty who are Pennsylvania residents can apply for PA Borrower privileges. They can borrow up to 10 books for four weeks at a time. There is no cost to any Pennsylvania resident. For more information on the PA Borrower privileges, visit <https://library.temple.edu/services/get-a-library-card-non-temple>.

1. Kitchen

Studio Incamminati provides a community kitchen for faculty, staff, and students. Please observe all posted signs in the kitchen. Dishes, glasses, and utensils must be washed and stored after usage. Leftover food and waste must be disposed of promptly. Perishable items must be removed from the kitchen refrigerator at the end of each week. Items should be clearly marked with name and date.

2. Wireless Internet Access

Studio Incamminati provides wireless internet access for all students in the Advanced Fine Art Program and the BFA program.

3. Copier

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

4. Parking

There is street parking around the Bok Building. Students and faculty should observe all posted parking restrictions, including time limits and street cleaning days. Parking garages are farther away, including South Broad Street.

Studio Incamminati
SCHOOL FOR CONTEMPORARY REALIST ART

CONTACT INFORMATION

Administration

Sheila Barker
Executive Director
sbarker@studioincamminati.edu
215 - 592 - 7910

Ellie Cox
Chief Financial Officer
ecox@studioincamminati.edu
215 - 592 - 7910

Dan Mahlman
Chief of Staff and Director of Operations
dmahlman@studioincamminati.edu
215 - 592 - 7910

Tamara Stokes
Financial Administrator
tstokes@studioincamminati.edu
215 - 592 - 7910

Nadine Wightman
Marketing Coordinator
nwightman@studioincamminati.edu
215 - 592 - 7911

Scott Woyak
Marketing Coordinator
swoyak@studioincamminati.edu
215 - 592 - 7911

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.

Follow us on Facebook, Twitter, YouTube and Instagram.

