Student Handbook 2026/27

Studio Incamminati

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WELCOME LETTER

Welcome to our school. You are joining a community dedicated to the serious study of realist art—an approach grounded in careful observation, disciplined practice, and respect for the traditions that have shaped visual culture across centuries.

Our program emphasizes technical mastery, critical thinking, and an honest engagement with the visible world. You will be challenged to draw and paint with intention, patience, and rigor, while developing your individual voice through skill rather than shortcuts. This handbook outlines the standards, expectations, and resources that support that mission.

We are pleased to have you with us and look forward to the work you will do here.

General Studio Policies

Hours of Operations

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 8:30 a.m. to 3:45 p.m. for daily classes and 6 p.m. to 9 p.m. for evening classes. The lunch break is from 12:00 to 12:45 p.m.

Studio Incamminati's studio spaces can be accessed by enrolled students from 7 a.m. to 11 p.m. every day.

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, volunteers, faculty, and staff will be sent an email to their address on file for the employee, specifying a closing or delayed opening. Additional closures may be imposed by the landlord, as in the case of fire drills and planned power shutdowns. 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.

Class Procedures

During daily class sessions, Studio Incamminati students are encouraged to enter other-level classrooms 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 considered, audibly, of the concentrated atmosphere of the classroom. With respect to classroom operations, any prolonged conversations should spill over into the corridors 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.

Studio doors may not be opened during a model's pose. Students must wait until the model breaks 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.

Food is prohibited throughout all the studio areas. (This applies to students, instructors, workshop/evening program artists, and models.) Drinks are permitted only if they have a spill-proof lid.

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 must be 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.

Access/Security

All studio access points should be closed and always locked. Access codes for the 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.

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

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. Models must never be photographed.

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 Studio Incamminati 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.

For Commercial Purposes: Commercial and special filming and photography arrangements are made 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.

Studio Visitors

Guests are permitted to walk through the Gallery at the Studio. However, prior authorization from the office personnel is required for guests to be permitted into the class/studio areas. Faculty, staff, contractors, volunteers, or students must always escort studio guests into the class/studio area.

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.

Billing/Refunds

Payment is due 30 days before the first 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
https://studioincamminati.edu/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 withdrew 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 withdrew 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.

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 it 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 course 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 grades for the class. After four absences (one- quarter of the semester) in a course, students will be asked to withdraw from the course and receive a grade of W for the course, or automatically fail the course and will need to repeat the course the following year. 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.

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.

Grading/Satisfactory Academic Progress Policy/Withdrawals

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 students' 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 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.

Evaluation Periods

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

Fall Semester – December Spring Semester – March

Informal (non-binding) written evaluations are also conducted at the mid-semester 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.

Academic Year Definition
For the purposes of Federal financial aid, the academic year definition is a minimum of 24 credits and 32 weeks of instructional time.

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 Executive Director/President 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 based on 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

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 Executive Director/President 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, and/or the Executive Director/President. 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 Executive Director/President.

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.

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 to earn credit for academic failure. These students will also be placed on Academic Development Status and have the right to appeal to that status. Students review the status of their Title IV HEA financial aid with the Financial Administrator.

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 have 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.

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.

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 requested 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.

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.

Credit transferred from other institutions becomes 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 is 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/President and/or Director of Operations and notify them 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/President and/or Director of Operations will record the circumstances and the 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.

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

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 students 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 Grants 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.

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.

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 the 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, 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 applied-may correct any of their own data by using FAFSA on the web. 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 the 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.

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 the 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 been 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 to 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

Awarding of Title IV, HEA Programs

Students cannot default on any previous student loans, and/or do they 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).

Pell Grant
A Pell Grant is 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.

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:

- Direct Subsidized Stafford Loan: A dependent or independent student may borrow up to $3500 as a first-year student and $4500 as a sophomore, provided the student has the need. There is no interest while the student is in school. Interest and repayment begin six months after graduation or withdrawal from school.

- 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

Counseling
Each student receiving a Direct Loan at Studio Incamminati must complete an Entrance Interview. Students can complete this interview at studentloans.gov, or they can ask their FAA 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.

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 is 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 withdraw may no longer be eligible for the full amount of Title IV HEA funds that were originally scheduled.

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 (drop or withdraw) from all their 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 withdraw 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 Title IV Funds earned 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 "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:

- Date the student provided official notification of intent to withdraw in writing
- Date the 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.
2. Perform two calculations:
    - 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.
    - 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:
    - The amount of Title IV HEA assistance the student has earned. This amount is based on the length of time the student was enrolled in the program, based on scheduled attendance, and the amount of funds the student received
    - 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
    - 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.

Unofficial Withdrawal

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.

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 about 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 to 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 calculation period.

The calculation formula determines the amount of Title IV or HEA aid that was disbursed, plus the Title IV or HEA aid that could have been disbursed.

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

2. Determine the percentage of the period completed:
3. 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).
4. COMPLETED DAYS
5. TOTAL DAYS IN PERIOD = % EARNED (rounded to one significant digit to the right of the decimal point, ex. .4493 = 44.9 %)
6. If this percentage is greater than 60%, the student earns 100%. If this percentage 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.
7. Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.
8. 100% minus percent earned = UNEARNED PERCENT
9. Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM Studio Incamminati.
10. The percentage of Title IV aid disbursed is greater than the percentage unearned (multiplied by) institutional charges for the period. The amount disbursed will be used in place of the unearned percentage.
11. If the percentage unearned (multiplied by) institutional charges for the period is 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 the current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 worksheet 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 student and/or parent accepts the Post-withdrawal Disbursement, 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 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 to the correct Title IV programs

The institution is not always required to return all the excess funds; there are situations in which, once the return to Title IV calculations have been completed, 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 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 regarding the return of Title IV HEA funds

- Returning to 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 withdrawal 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 withdrawal 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/President

Refund vs. Return to Title IV
The requirements for the Title IV HEA program funds, when students withdraw, are separate from the Studio Incamminati refund policy.

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

Studio Incamminati's refund policy is in the School Catalog and the Policies & Guidelines. A copy of the paper 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.

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 they will be reported to the proper authorities.

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 and can be reviewed at any time on the Studio's website.

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

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 people.

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:

- Students' dates of attendance
- Date of graduation and degree or certificate earned

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

- Student's address, telephone listing, or program of study
- Awards received
- The most recent previous education or institution attended

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

- Course grades or grade point average
- Courses taken
- Social security numbers 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 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 by 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 work.

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 to confirm the 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

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 Title IX Officer and then the Executive Director/President.

If the concern pertains to financial aid or billing, please contact the Financial Administrator and then the Executive Director/President in that order.

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

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 is 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. Questions or concerns that are not satisfactorily resolved by the people 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.

STUDENT ASSISTANCE SERVICES

Personal Counseling Referrals

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

AMENITIES

School Store

A limited number of supplies are available for purchase on-site at the school store located in 7E.

Reference Library

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.

The library is open for students Monday to Friday from 9 am to 5 pm during the academic year. Additional hours will vary. Library books are not permitted to be removed from the school library without permission from the administrative staff.

The school administrative staff 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.

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.

Philadelphia Museum of Art

Students, faculty, staff, contractors, and volunteers are welcome to use the library of the Philadelphia Museum of Art (PMA). The (PMA). The 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 if provided by the PMA Library personnel by arrangement. https://philamuseum.org/library/.

Temple University Library

Students, faculty, staff, contractors, and volunteers can visit Temple University's Charles Library to use the facilities or conduct research using its 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, faculty, staff, contractors, and volunteers 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.

Kitchen

Studio Incamminati provides a community kitchen for students, faculty, staff, contractors, and volunteers. Please observe all the 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.

Wireless Internet Access

Studio Incamminati provides wireless internet access for all students in the Advanced Fine Art Program and the BFA program. The Studio also provides wireless internet access to all faculty, staff, contractors, and volunteers

Copier

The copier in the administrative office is available for students with prior office approval.

Parking

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

TECHNOLOGY

Email Policy

The email system is the property of the school. All emails are archived on the server in accordance with our records retention policy, and all emails are subject to review by the school.

The school email system is School property, and as such, is subject to monitoring. System monitoring is done for your protection and the protection of the rights or property of the provider of these services. Please consider this when conducting personal business using School hardware and software.

Electronic mail is like any other form of School communication and may not be used for harassment or other unlawful purposes. Your email account is a School-provided privilege and is School property. Remember that when you send an email from the school domain, you represent the school, whether your message is educational or personal.

A student's access to the school email is cut off immediately upon their graduation or when a student is expelled.

Confidentiality of Electronic Mail

As noted above, electronic mail is always subject to monitoring, and the release of specific information is subject to applicable laws and the school's rules, policies, and procedures on confidentiality. Existing rules, policies, and procedures governing the sharing of confidential information also apply to the sharing of information via School hardware and software.

Social Media Policy

The term "social media" includes all means of communicating or posting information or content of any sort on the internet, including to your own or someone else's web log or blog, journal or diary, personal website, social networking or affinity website, web bulletin board, or a chat room, whether or not associated or affiliated with the School, as well as any other form of electronic communication. The same principles and guidelines found in the School rules, policies, and procedures apply to students at the Studio's social media activities online.

Any conduct that adversely affects a student's academic performance or the performance of fellow students, or otherwise adversely affects the School's legitimate business interests, may result in disciplinary action, up to and including expulsion. Similarly, inappropriate postings, including but not limited to discriminatory remarks, harassment, and threats of violence, or similar inappropriate or unlawful conduct, will not be tolerated and may result in disciplinary action, up to and including expulsion. However, this restriction will not apply to any postings made in the exercise of any rights granted to a student by federal, state, or local law.

Internet Policy

Access to the internet is given principally for school-related activities or approved educational/training activities. Incidental and occasional personal use and study use are permitted. This privilege should not be abused and must not affect the student's performance in school-related activities.

Right to Monitor

The school email and internet system are always the property of the school. By accessing the internet and electronic mail services through facilities provided by the school, you acknowledge that the school (by itself or through its Internet Service Provider) may, from time to time, monitor, log, and gather statistics on employee internet activity and may examine all individual connections and communications. Please note that the school uses email filters to block spam and computer viruses. These filters may, from time to time, block legitimate email messages.

Responsibilities and Obligations

Students may not access, download, or distribute material that is illegal, or which others may find offensive or objectionable, such as material that is pornographic, discriminatory, harassing, or an incitement to violence.

You must respect and comply with copyright, trademark, and similar laws, and use such protected information in compliance with applicable legal standards. When using web-based sources, you must provide appropriate attribution and citation of information to the websites. Software must not be downloaded from the internet without the prior approval of qualified people within the school.

Violation of this Policy

In all circumstances, use of internet access and email systems must be consistent with the law and School policies. Violation of this policy is a serious offense and subject to the requirements of the law, may result in a range of sanctions, from restriction of access to electronic communication facilities to disciplinary action, up to and including expulsion.

Recording of Conversations Policy

This policy establishes guidelines for the lawful and ethical recording of conversations within the organization to protect the privacy and rights of all employees, clients, and stakeholders.

The unauthorized recording of conversations, whether in person, over the phone, or via virtual communication platforms, is strictly prohibited unless all participants have been informed and consent has been obtained. This policy applies to all employees, volunteers, students, and representatives of the organization.
This policy applies to:

- In-person discussions
- Phone calls
- Virtual meetings (e.g., Zoom, Teams, Webex, etc.)
- Any other form of communication where voices or conversations may be recorded

Prohibited Conduct

- Employees, volunteers, students, and representatives may not secretly record any conversation, meeting, or discussion without the knowledge and consent of all parties involved.
- Any recording made without prior authorization is considered a violation of this policy and may result in disciplinary action, up to and including termination.

- Unauthorized recordings may also violate applicable state and federal wiretapping laws, which could result in legal consequences.

Permitted Exceptions
Recording may be permitted **only** under the following circumstances:

1. Explicit Consent – All parties must be aware of and agree to the recording.
2. Business Necessity – If recording is required for official purposes (e.g., training, compliance, investigations), it must be authorized by management.
3. Legal Requirements – If required by law or with prior approval from legal counsel.

Enforcement & Consequences
Violations of this policy will be subject to disciplinary action, which may include:

- Verbal or written warnings
- Suspension
- Termination of employment
- Legal action, if applicable

HEALTH AND SAFETY

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 individuals 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 11th Street, Philadelphia, PA 19147, phone 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, faculty, staff, contractors, and volunteers 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 always locked. 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. Theft of Studio

Incamminati's or another individual's property will result in immediate expulsion, dismissal, or removal from your position.

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 to 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 the doors before opening them. If the door 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 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.

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 all students, faculty, staff, contractors, and volunteers 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. Students, faculty, staff, contractors, and volunteers who perceive an immediate threat toward any other person on the school premises should call emergency 911.

The Administrative Office has set up an email that will reach all current students, faculty, staff, contractors, and volunteers to inform them of any emergency on campus. 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, consider the safety of the community, determine the content of the notification, and initiate the notification system unless it issues a notification that, in the professional judgment of responsible authorities, will compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Students, faculty, staff, contractors, and volunteers should remain in the room if they are notified of a possible emergency.

An Emergency Committee 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.

Reporting a Crime

If students, faculty, staff, contractors, and volunteers 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/President works with local law enforcement when a crime is reported. Crimes reported to the Administrative Office are included in the annual campus crime statistics. In addition, the school requests that the Philadelphia Police Department provide crime information not reported to the Administrative Office for inclusion in the annual campus crime statistics. Further, if circumstances warrant, students, faculty, staff, contractors, and volunteers will be notified if an ongoing threat is posed related to a reported crime.

Students, faculty, staff, contractors, and volunteers who are the victims 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 race (including hairstyles and textures culturally associated with race), religion, color, sex (including pregnancy, childbirth, breastfeeding, sexual orientation and gender identity or expression), national origin, ancestry, place of birth, disability, handicap, age (40 years and over), genetic information, use (including handling and training) of a guide or support animal because of the blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, or any other status protected under applicable federal, state or local laws. 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 people they are counselling 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, faculty, staff, contractors, and volunteers 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, staff, contractors, and volunteers annually.

In addition to any criminal sanctions, the school will impose appropriate disciplinary sanctions if the offender is a student, faculty, staff, contractor, or volunteer 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 many accommodations as can reasonably be made relative to the student's academic situation.

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 attacks 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, staff, contractors, and volunteers 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.

Registered Sex Offenders

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

Commonwealth of Pennsylvania notifies an educational institution of information concerning registered sex offenders, the Family Educational Rights and Privacy Act (FERPA) does not prevent educational institutions from disclosing such information.

Hate Crimes

A hate crime is a criminal offense committed against a person or property that is motivated, in whole or in part, by the offender's bias. Bias is a negative opinion or attitude toward a group of people based on their race, gender, religion, disability, sexual orientation, ethnicity, national origin, or any other protected characteristic protected by law.

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 can 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 an 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.

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 because 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 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.

Timely Warning

The Clery Act requires Studio Incamminati to alert students, faculty, staff, contractors, and volunteers 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 it 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 account for the safety of the students, faculty, staff, contractors, and volunteers, 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.

Critical Incident Response Plan

Objectives

1. To coordinate the school's response to critical incidents while paying special attention to the safety and security needs of students, faculty, staff, contractors, and volunteers.
2. To maintain the safety and security of students, faculty, staff, contractors, and volunteers 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, staff, contractors, and volunteers in the event of a critical incident.

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.

Residential Facilities

Studio Incamminati does not have school-operated residential facilities for students. However, the school is required to act in a timely manner that is timely and will aid in the prevention of similar crimes and report to students, faculty, staff, contractors, and volunteers 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 gun possession, including people 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, faculty, staff, contractors, and volunteers occurring on campus, the school will follow its emergency notification procedures.

Personal Responsibility for Safety

Although Studio Incamminati will make every effort to ensure the safety of its students, faculty, staff, contractors, and volunteers, 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, staff, contractors, and volunteers:

- Report all suspicious activity to the Administrative Office immediately.
- Never take personal safety for granted.
- Avoid walking alone at night. Travel with a friend or companion.
- Avoid parking or walking in secluded or dimly lit areas.
- Carry only small amounts of cash.
- Never leave valuables (wallets, purses, books, computers, etc.) unattended.
- Always carry your keys with you, and don't lend them to anyone.
- Lock your car doors and close the windows when leaving your car.
- Never leave valuables in your car, especially if they are easily noticeable.
- Inventory your personal property and make records of the serial numbers of all items of value.
- Never admit anyone on school premises who is not a student, teacher, or other authorized personnel.
- Follow approved practices and procedures or standards that apply to any work you perform for the school.
- Report to the instructor or the Administrative Office any condition that 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, should 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 not to endanger themselves.

- Unauthorized alcoholic beverages are not permitted on School property, and the use of such is prohibited. No one is to report for work or class exhibiting any effects of alcoholic consumption.
- Controlled substances are illegal under 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.

Student Assistance Services: Personal Counseling Referrals

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

Good Housekeeping

Good housekeeping is essential for 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 that create hazards. Cleaning up the area where you are working is part of the classes.

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: turpentine, varnishes containing turpentine, spray fixative, all forms of “Workable Fixative,” and charcoal powder.

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 the solvents used must be labeled, sealed, and stored in a designated cabinet for flammable materials.
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. Relevant Material Data and Safety Sheets are posted on the bulletin board outside the office.

Waste Disposal and Recycling

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

Lighting and Equipment

Halogen lights used for lighting the model and still-life setups get extremely hot. Please use caution when handling, for both you 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 can handle lighting on the models. Safety lines on the lighting should always be in use.

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.

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 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 explosion or fire hazard.
- The danger of ingestion of a poisonous, corrosive, or hazardous substance through the mouth or absorbed through the skin.

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 hazardous material and irrigation facilities are not available, they should immediately be referred to a hospital emergency room.

Firearms

Firearms, ammunition, explosives, or other weapons are prohibited on school property, apart from law enforcement agencies.

Accident Investigation 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 on 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.

Inclement Weather Policy

Only the Executive Director/President has the authority to close the school. When this action is taken, the director will authorize an email to be sent to the faculty, staff, contractors, volunteers, and students. The email will specify a closing or delayed opening.

In any event, faculty, staff, contractors, volunteers, and students should not attend school if, according to 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.

The Executive Director/President will close or delay opening the school in the following scenarios:

Tornado

- Dismissal of all classes and assembly of faculty, staff, contractors, volunteers, and students 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/President, 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.

Flooding

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

Ice and Snow

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

Smoking Policy

In order to provide a safe and comfortable environment for everyone, smoking and vaping are strictly prohibited at all times inside any School building or within 20 feet of any building entrance, window, or ventilation system. Additionally, no smoking is permitted anywhere in the Bok Building, including the open-air terraces.

Violators are subject to a $100 fine.

Drug and Alcohol Policy and Prevention

Drug Free Campus Guidelines

In compliance with the Drug-Free Schools and Communities Act (DFSCA), Studio Incamminati has set forth in this guide the penalties under Federal law for the illegal possession or distribution of drugs and alcohol, as well as the range of sanctions that will be imposed for violation of the policies regarding substance abuse. These policies apply to students, faculty, volunteers, and staff.

Policy Overview

The United States Department of Education has issued regulations for the implementation of the provisions of the "Drug-Free Schools and Communities Act Amendments of 1989" (Public Law 101-226). Studio Incamminati will distribute annually to students, faculty, staff, contractors, and volunteers information regarding the unlawful possession, use, or distribution of illicit drugs and alcohol on school property.

Standards of Conduct

Studio Incamminati is committed to a campus free of illegal drug use, misuse, and abuse of prescription drugs, underage drinking, and alcohol abuse. Unlawful possession as well as the distribution of illegal drugs or alcohol is prohibited on school property or as part of its activities. Studio Incamminati will cooperate fully with law enforcement agencies and will apply appropriate internal disciplinary processes should a student, faculty, volunteer, or staff member violate criminal statutes with regard to illegal drugs or possession or sale of alcohol. Any student, faculty, staff, contractor, or volunteer for whom there is a reasonable suspicion that he or she is engaging in any academic activity while under the influence of drugs or alcohol will be subject to testing. Reasonable suspicion exists when a trained employee or faculty member **observes specific, articulable, and objective facts** that lead them to believe an employee/volunteer/student may be under the influence of drugs or alcohol. These observations must be **based on behavioral, physical, or performance indicators.** Failure to comply with this policy may result in disciplinary action, up to and including expulsion, dismissal, or removal from your position.

Treatment

Studio Incamminati will give the same consideration to people with chemical dependency or alcohol-related problems as it does to individuals having other health problems. Seeking assistance with such a problem will not jeopardize a student's enrollment or faculty, staff, contractor, or volunteer position, whereas continued problems with performance, attendance, or behavior will. Medication and behavioral

therapy, alone or in combination, are aspects of an overall therapeutic process that often begins with detoxification, followed by treatment and relapse prevention. Easing withdrawal symptoms can be important in the initiation of treatment; preventing relapse is necessary for maintaining its effects. And sometimes, as with other chronic conditions, episodes of relapse may require a return to prior treatment components. A continuum of care that includes a customized treatment regimen addressing all aspects of an individual's life, including medical and mental health services, and follow-up options (e.g., community or family-based recovery support systems) can be crucial to a person's success in achieving and maintaining a drug-free lifestyle.

Hotline Numbers

National Drug and Alcohol Treatment referral Services: 800-662-4357
Southeastern Pennsylvania Intergroup Association of Alcoholics Anonymous: 215-923-7900.

School Disciplinary Sanctions

It is the school policy to discourage all violations of Federal, State, or local laws by any member of the school community. In addition to prosecution and punishment by civil authorities, students, faculty, staff, contractors, or volunteers violating any law may be subject to sanctions imposed by the school.

- **Students:** Sanctions against students include, but are not limited to, discipline, expulsion, suspension, and/or probation. When appropriate, school sanctions may be entered into permanent records. These disciplinary actions may affect the student's Title IV Federal Student Aid eligibility for future semesters. Parents of dependent students will be notified of pending charges or subsequent decisions.
- **Faculty, staff, contractors, and volunteers:** The school may impose sanctions against any person who violates Federal, State, or local laws, or the standards of school conduct. Depending on the nature and severity of the violation, these sanctions can range from warnings and/or mandatory referral for drug or alcohol rehabilitation to outright dismissal/removal from your position.

FEDERAL AND STATE POLICIES

Non-Discrimination

Studio Incamminati values diversity and seeks talented students, faculty, and staff from diverse backgrounds. Studio Incamminati does not discriminate basis of race (including hairstyles and textures culturally associated with race), religion, color, sex (including pregnancy, childbirth, breastfeeding, sexual orientation and gender identity or expression), national origin, ancestry, place of birth, disability, handicap, age (40 years and over), genetic information, use (including handling and training) of a guide or support animal because of the blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, or any other status protected under applicable federal, state or local laws in the administration of its admissions, financial aid, educational or athletic programs, or other University-administered programs or its employment practices.

We strive for an artistic and educational environment free from 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.

Anti-Discrimination & Anti-Harassment Policy

Studio Incamminati seeks to preserve a work and learning environment free from abusive, hurtful, discriminatory, 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.

The studio will not tolerate discrimination or harassment on the basis of race (including hairstyles and textures culturally associated with race), religion, color, sex (including pregnancy, childbirth, breastfeeding, sexual orientation and gender identity or expression), national origin, ancestry, place of birth, disability, handicap, age (40 years and over), genetic information, use (including handling and training) of a guide or support animal because of the blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, or any other status protected under applicable federal, state or local laws.

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 harassment and/or sexual harassment within the organization. This organization is committed to providing all students with a safe environment and will not tolerate the harassment of one student by another student. Conduct by students that rise 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 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 causes harm to a person’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

deficiencies. Emotional abuse includes any such conduct or speech involving shaming, humiliation, or cruelty.

Bullying is defined as repeated and intentional behavior that intimidates, humiliates, degrades, or threatens an individual, creating a hostile or offensive educational or work environment. It can take many forms, including verbal abuse, social exclusion, spreading false rumors, or even cyberbullying.

Artistic Instruction and Nudity in Educational Settings
As an institution dedicated to artistic expression and education, the school's program includes **life drawing and painting sessions involving nude models as a standard and essential part of the curriculum**. The presence of nude models in these sessions is purely for artistic and educational purposes and should not be interpreted as inappropriate conduct or harassment.

While the School maintains a **zero-tolerance policy** for sexual harassment, it is important to clarify that participation in **life drawing and other nude figure study sessions does not, in itself, constitute sexual harassment**. These activities are conducted in a professional and structured environment with clear expectations of respect, professionalism, and artistic integrity.

Students, faculty, and staff are expected to engage in these sessions **with the highest level of professionalism** and adhere to the institution's standards of **respect, decorum, and ethical artistic practice**. Any conduct that goes beyond the scope of academic instruction and creates a hostile or uncomfortable environment for others will be subject to review under the school's sexual harassment policy.

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

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 complaint 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.

For more information, please review the full Policy housed outside of this handbook.'

Americans With Disabilities Act Amendments Act of 2008 Policy (PA)

The federal Americans with Disabilities Act Amendments Act of 2008 (ADAAA) and Pennsylvania law prohibit discrimination against qualified students with disabilities to ensure equal access to education and campus activities.

As a matter of School policy, the school prohibits discrimination, harassment, and retaliation of any kind against people with disabilities, and complies with all applicable discrimination laws.

Disabled Defined

A student is considered disabled if they (1) have a physical or mental impairment that substantially limits one or more major life activities; (2) have a record or history of such an impairment; or (3) are regarded or perceived (correctly or incorrectly) as having such an impairment.

Reasonable Accommodation

A reasonable accommodation is any change in the educational environment (or in the way things are usually done) to help a person with disabilities gain equal access to education and campus activities. The school will make every effort to provide reasonable accommodation to students who need it unless doing so would cause the school undue hardship.

Qualified students who are disabled may request reasonable accommodation from the school if it is necessary for them to have equal access to education and campus activities. If you are disabled and you desire such reasonable accommodation, contact the Executive Director/President or a School Administrator. On receipt of your request, we will meet with you to discuss your disability. We may ask for information from your health care provider(s) regarding the nature of your disability and the nature of your limitations or take other steps necessary to help us determine viable options for reasonable accommodation. We will then work with you to determine whether your disability can be reasonably accommodated, and if it can be reasonably accommodated, we will explore alternatives with you and endeavor to implement a mutually agreeable reasonable accommodation.

Reasonable accommodation may take many forms, and it will vary from one student to another. Please note that according to the law, the school does not have to provide the exact accommodation you want, and if more than one piece of accommodation works, we retain the right to choose which one to provide. Furthermore, the School does not have to provide accommodation if doing so would cause undue hardship to the school.

Lactation Accommodation for Nursing Students

The Studio is committed to creating an inclusive and supportive environment for all students, including those who are nursing mothers. This policy ensures compliance with Title IX of the Education Amendments of 1972 and other applicable laws by providing reasonable accommodations for students who need to express breast milk or nurse their child while attending classes or other academic activities.

Nursing students are entitled to reasonable accommodations to allow them to pump breast milk or breastfeed without academic penalty. These accommodations include, but are not limited to, access to lactation spaces, break time, schedule flexibility, and academic support to ensure they can fully participate in their education.

Requesting Accommodations
Students who need lactation accommodations should contact the Executive Director/President or a School Administrator as early as possible to discuss available resources and make necessary arrangements.

Religious Observance Policy

Equal opportunity laws require schools to accommodate a student's religious beliefs. The Studio respects your religious beliefs and will work with you to provide you with reasonable accommodation if you request one, and it does not cause an undue hardship to the educational institution and environment.

Interactions and Relationships Between Faculty, Staff, Volunteers, And Students

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.

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 this kind 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 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 complaint 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.

No faculty, fellow, or staff member shall enter 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 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.

Minors in School Facilities Policy

Studio Incamminati ("The School" or "Incamminati") strives to conduct its operations and maintain its facilities in a manner consistent with its mission as an institution of higher education. While there may be occasions when the presence of Minors on or brief visits by Minors to the School may be appropriate or necessary, including, but not limited to circumstances when they are hired to work on and/or permitted to participate in activities at the School or sponsored (on- or off-campus) by the School, minors are not permitted to be unescorted or unsupervised on School premises, except as set forth in this Minors in School Facilities Policy ("Policy"). In addition to the requirements of this Policy, the visits of Minors are subject to the same conditions as any other visitors to the school. Any Studio Incamminati employee who suspects that a Minor who is on School premises for any reason or is participating in a School-sponsored activity at another location has been the victim of child abuse shall immediately report the suspected abuse consistent with the School's Mandatory Child Abuse Reporting Policy.

Scope

This Policy applies to activities, classes, and programs taking place in Studio Incamminati's facilities, or School-sponsored "off-campus" activities, in which Minors will be physically present and participating.

Authority

This Policy is informed and guided by the Pennsylvania Child Protective Services Law (the "Law"). The full Law can be found at 23 Pa. C.S. § 6301, et seq.

Note

Camps, workshops, open studios, and classes, intended for elementary and high school students, and similar activities will fall within the scope of this Policy. involve the housing of Minors in residence halls.

Defined Terms Under This Policy

"Minor" for the purpose of this Policy means any person under the age of 18 who is not currently an enrolled student at Saint Joseph's University.

"Program/Project/Activity Manager" for the purpose of this Policy is the school's point person for the program. This person is the ultimate decision-making authority for the program.

"Authorized Adult" for the purpose of this Policy means any individual, paid or unpaid, who interacts with, supervises, chaperones, accompanies (other than as a parent or legal guardian), or otherwise oversees Minors in program activities, or recreational, and/or residential facilities. This includes but is not limited to faculty, staff, administrators, volunteers, students, interns, employees (regular or temporary), and independent contractors.

"Direct Contact" for the purpose of this Policy means the care, supervision, guidance, or control over Minors as defined by this Policy.

Requirement of Policy Governing the Presence of Minors on Campus

In an effort to minimize any disruption to the essential functioning of the school and maximize the safety of Minors on School premises, certain requirements must be met, as follows:

- Minors must always be supervised by an Authorized Adult while at the school or participating in a School-sponsored “off-campus” activity.
- Even when accompanied by an Authorized Adult, Minors participating in a program on School premises or a School-sponsored off-campus activity are prohibited from areas where significant potential safety hazards and liabilities may exist, and where strict safety precautions are required.
- Minors and Authorized Adults not meeting relevant School community conduct standards will be asked to leave the premises or activity.
- Minors, other than Minors enrolled at the school, are not allowed in classrooms while classes are in session unless permission is granted by the faculty member having authorized access to the classroom in advance of the start of class. Should a Minor become disruptive, the Authorized Adult and Minor may be asked to leave.

Implementation of this Policy in Connection with Programs on School Premises or School-Sponsored “Off-Campus” Activities

Background Checks

Prior to Direct Contact with Minors and at least once every three (3) years thereafter, School employees and every Authorized Adult in a program or activity covered by this Policy must successfully complete background checks, including the Pennsylvania Criminal Record Search, FBI Fingerprinting Check, and Pennsylvania Child Abuse Clearance.

It is the responsibility of the Program/Project/Activity Manager to ensure that each Authorized Adult has submitted the required background checks and has subsequently received clearance to participate. Failure to fulfill the background check obligation, including the 72-hour self-disclosure requirement, shall be subject to discipline, up to and including termination or removal from the program.
The school may accept successful documented background clearances from other governmental agencies (e.g., School Districts) that have been completed within one year from the start date of employment.

A decision not to permit an individual to participate in a program or activity covered by this Policy based on the results of a background check will be made by the President or Chief of Staff. The results of background checks conducted under this Policy will be used only for the purposes of this Policy, except that Studio Incamminati reserves the right to take appropriate action with respect to employees who may have falsified or failed to disclose information material to their employment on their employment application uncovered as a result of the background check, including and up to immediate termination of employment. Copies of background check reports for employees will be retained in the President’s Office.

Conduct Requirements

Authorized Adults participating in programs and activities covered by this Policy shall not:

- Have one-on-one contact with Minors; in general, it is expected that activities where Minors are present will involve two or more Authorized Adults.
- Participate in a sleepover under the auspices of the program or activity, unless two or more Authorized Adults are present, and always remain in each other's presence.
- Engage in abusive conduct of any kind toward, or in the presence of, a Minor.
- Strike, hit, administer corporal punishment to, or touch in an inappropriate or illegal manner any Minor.
- Pick up Minors or drop off Minors from their homes, other than the driver's child or children or friends of the driver's child, with permission, whether before, during, or after the program or activity.
- Engage in the use of, or be under the influence of, alcohol or illegal drugs, during such programs or activities.
- Make pornography in any form available to Minors participating in programs and activities covered by this Policy or assist them in any way in gaining access to pornography.

Allegation of Inappropriate Conduct

Authorized Adults participating in programs and activities covered by this Policy shall:

- Be familiar with and strictly adhere to Studio Incamminati's Mandatory Child Abuse Reporting Policy.
- Strive to ensure the safety of Minors participating in programs and activities covered by this Policy, and, when appropriate, remove Minors from dangerous or potentially dangerous situations. In such a case, the President must be notified immediately, and, in the event that the President is not immediately available, then the Chief of Staff/Director of Operations.
- Discontinue any further participation in programs and activities covered by this Policy when an allegation of inappropriate conduct has been made against him or her, until such allegation has been satisfactorily resolved.

STUDENT HANDBOOK ACKNOWLEDGEMENT AND RECEIPT

I acknowledge that I have received and read a copy of the Studio Incamminati Student Handbook. I understand that the Handbook outlines important information about the school's policies, procedures, expectations, and resources.

I agree to abide by and be responsible for following the rules, standards of conduct, and policies outlined in the Handbook during my enrollment. I also understand that it is my responsibility to stay informed of any updates or changes to the Handbook, which may be communicated to students in writing.

I further acknowledge that the school reserves the right to revise, remove, or add to the provisions in the Student Handbook at any time, and that such changes will be provided in writing. I understand that no oral statement or representation can alter the contents of the Handbook.

I have read and understand the above statements.

_____
Student's Name in Print

_____ Date: _____
Signature of Student

*****TO BE PLACED IN THE STUDENT'S FILE*****

STUDENT ACKNOWLEDGEMENT OF ANTI-DISCRIMINATION & ANTI-HARASSMENT POLICIES

I acknowledge that I have received, read, and understand Studio Incamminati's Anti-Discrimination and Anti-Harassment Policies as outlined in the Student Handbook. I understand that the school is committed to providing a learning environment free from discrimination, harassment, and retaliation, and I agree to uphold and follow these policies.

I understand that discrimination or harassment of any kind—whether based on race (including hairstyles and textures culturally associated with race), religion, color, sex (including pregnancy, childbirth, breastfeeding, sexual orientation, and gender identity or expression), national origin, ancestry, place of birth, disability, age, genetic information, or the use or training of a guide or support animal, or any other status protected under federal, state, or local law—is strictly prohibited.

I acknowledge my responsibility to report any violations of this policy, whether I am personally affected or witness inappropriate behavior toward others. I understand that the school prohibits retaliation against anyone who, in good faith, makes a report or participates in an investigation, and that all concerns will be addressed promptly and thoroughly.

By signing below, I confirm that I understand the Anti-Discrimination and Anti-Harassment Policies and my role in contributing to a respectful, inclusive, and professional academic environment. I also acknowledge that I will abide by the expectations outlined in the policy.

_____
Student's Name in Print

_____ Date: _____
Signature of Student

*****TO BE PLACED IN THE STUDENT'S FILE*****