

penrose academy

STUDENT CATALOG APRIL 2024

13402 North Scottsdale Rd, Suite B160
Scottsdale, AZ 85254
P: 480.222.9540
www.penrose.edu

Dear Future Graduate, Welcome to Penrose Academy!

Through meaningful educational experiences, Penrose Academy educates, empowers and connects students to their professional goals.

Today's marketplace is promising and competitive. Creating a confident, customer-focused graduate who has studied current techniques, trends and business practices is a key goal for Penrose Academy. Our education is student-centered and focuses on our graduates being industry ready.

In the following pages, you will find information about our curricula and cultural standards at Penrose Academy as well as our current tuition, payment schedule and information on financial assistance. This Student Catalog is divided into sections to help you not only keep the information logically organized but to ensure you gain a proper understanding of the policies and procedures at Penrose Academy. Please review it carefully as it contains answers to many important questions. Additionally, please visit our website www.penrose.edu for the most current information.

Thank you for choosing Penrose Academy and we look forward to your continued success.

Sincerely,



Nancy Meduna
CEO | Owner



Matt Meduna
Chairman | Owner

SECTION ONE: WELCOME TO PENROSE ACADEMY	0
SECTION TWO: OUR SCHOOL	1
ACCREDITATIONS AND MEMBERSHIPS	1
LICENSING AND CERTIFICATION.....	1
MISSION STATEMENT.....	1
PENROSE ACADEMY DISCLOSURES	1
HOURS OF OPERATION	1
METHOD OF DISCLOSURES.....	1
OBTAINING INFORMATION.....	2
COPYRIGHT INFRINGEMENT.....	2
VACCINATION POLICY.....	2
CONSTITUTION DAY.....	2
VOTER REGISTRATION	2
SECTION THREE: INSTITUTION AND FINANCIAL INFORMATION	3
PENROSE ACADEMY STAFF AND FACULTY	3
ADMISSIONS AND ENROLLMENT POLICIES AND PROCEDURES	3
ACADEMIC ADVISEMENT MEETING AND ADMISSIONS ASSESSMENT.....	4
EXPECTATIONS FOR PROSPECTIVE STUDENTS.....	4
RESCINDING ADMISSION.....	4
ENROLLMENT PROCEDURES	4
ACCEPTANCE PROCEDURE	4
ENROLLMENT AGREEMENT.....	4
ENGLISH LANGUAGE PROFICIENCY ADMISSION REQUIREMENT.....	4
FOREIGN DIPLOMAS OR TRANSCRIPTS	5
HIGH SCHOOL COMPLETION POLICY	5
TRANSFER POLICY.....	5
2024 PROGRAM START DATE CALENDAR*	5
2024 TUITION AND FEES.....	6
STUDENT KITS.....	6
ISBN/TEXTBOOK INFORMATION	6
MISCELLANEOUS SUPPLIES.....	6
PAYMENT POLICY	6
LATE FEE	6
PROCESSING FEE	6
PROGRAM REQUIREMENTS	6
REQUESTING ADDITIONAL PROGRAM HOURS.....	6
TRANSFER BETWEEN PROGRAMS.....	6
TRANSFER TO DIFFERENT SCHEDULE	7
RECRUITING ACTIVITIES	7
SCHOLARSHIPS	7
ADDITIONAL FINANCIAL BENEFITS	7
FINANCIAL AID	7
LOAN COUNSELING.....	8
MAINTAINING FINANCIAL AID ELIGIBILITY	8
STUDENT'S RIGHT TO CANCEL.....	8
REFUND/AMOUNT DUE POLICY	8
REFUND TIME FRAME	8
RETURN OF TITLE IV FUNDS (R2T4)	8
COVID R2T4 POLICY	9
WITHDRAWAL/TERMINATION	9
RE-ENROLLMENT.....	9
COLLECTIONS POLICY.....	10
OVER CONTRACT CHARGES	10
OVER CONTRACT CHARGES AND GRACE PERIODS (FREE OF CHARGE).....	10
EXCUSED ABSENCES	10
BONUS HOURS AND MINIMIZING OVER CONTRACT FEES	10
SATISFACTORY ACADEMIC PROGRESS (SAP).....	10
EVALUATION CHECKPOINTS	11
WARNING.....	11
PROBATION.....	11
RE-ESTABLISHING SATISFACTORY ACADEMIC PROGRESS (SAP).....	11
SAP APPEAL PROCESS	11
ACADEMIC WORK	11
GRADING SCALE	12
ACADEMIC AUDITS	12
GRADUATION REQUIREMENTS	12
DISTANCE EDUCATION	12
STUDENT SERVICES.....	12
SECTION FOUR: VETERAN'S EDUCATION BENEFITS	13
PENROSE ACADEMY REFUND POLICY FOR VETERAN BENEFITS	13
ACADEMIC WORK FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	13
GRADING SCALE FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	13
SATISFACTORY ACADEMIC PROGRESS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	13
EVALUATION CHECKPOINTS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS.....	13
WARNINGS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	14
PROBATION/SAP FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS.....	14
APPEAL PROCESS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	14
OVER-CONTRACT FEES FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS	14
SECTION FIVE: DISABILITY ACCOMMODATION & GRIEVANCE POLICY	15
STATEMENT OF NON-DISCRIMINATION AND ACCOMMODATION	15

HANDICAPPED ACCESS	15
PHYSICAL EXPECTATIONS	15
REQUESTS FOR ACCOMMODATION	15
STUDENT APPEAL	16
GRIEVANCE PROCEDURE.....	16
SECTION SIX: ACADEMIC PROGRAMS.....	17
COSMETOLOGY HYBRID PROGRAM OVERVIEW.....	17
HAIR HYBRID PROGRAM OVERVIEW.....	17
ESTHETICS PROGRAM OVERVIEW.....	17
LASER PROGRAM OVERVIEW.....	17
SECTION SEVEN: STUDENT-RIGHT-TO-KNOW INFORMATION.....	18
PROGRAM CAREER/OCCUPATION INFORMATION.....	18
STUDENT RECORDS & RIGHT OF ACCESS AND PRIVACY	18
SECTION EIGHT: EXPECTATIONS OF STUDENTS ON OUR CAMPUS.....	20
COMMUNITY INVOLVEMENT.....	20
STUDENT GUIDELINES.....	20
STUDENT CODE OF CONDUCT POLICY.....	20
PROHIBITED CONDUCT.....	20
RIGHTS AND RESPONSIBILITIES.....	21
CODE OF CONDUCT VIOLATION PENALTIES.....	21
RIGHT TO DUE PROCESS.....	22
DISCIPLINARY MEASURES.....	22
STUDENT COMPLAINT POLICY.....	22
STUDENT COMPLAINT PROCEDURE.....	22
GRIEVANCE PROCEDURE FOR STUDENT COMPLAINTS.....	22
RECORDKEEPING.....	23
SUBSTANCE ABUSE PREVENTION POLICY.....	23
SAFETY SANITATION AND INFECTION CONTROL (SSIC).....	23
ACADEMIC TRANSCRIPTS.....	24
ATTENDANCE.....	24
CLOCKING IN AND OUT.....	24
ZONE 1 ATTENDANCE POLICY.....	24
LEAVE OF ABSENCE (LOA).....	24
ZONE EDUCATION.....	25
FACULTY CHOICE.....	25
PERSONAL APPEARANCE.....	25
GENERAL PERSONAL APPEARANCE FOR ALL PROGRAMS.....	25
STUDENT ADVICE/COACHING.....	25
TECHNOLOGY POLICY.....	26
DISCIPLINARY ACTION.....	26
STUDENT CATALOG VIOLATIONS.....	26
APPEAL PROCESS.....	26
SECURITY CAMERAS.....	27
USE OF PHOTOGRAPHY AND VIDEOGRAPHY.....	27
VISITORS.....	27
PARKING.....	27
CAMPUS SEARCHES.....	27
LOCKERS.....	27
UNLICENSED PRACTICE.....	27
STATE BOARD REFRESHER CLASSES.....	27
GRATUITIES.....	27
PRODUCT PURCHASES.....	27
EXTRACURRICULAR ACTIVITIES.....	27
STUDENT/STAFF RELATIONS.....	27
CONSUMER DISCLOSURES.....	28
SECTION NINE: CAMPUS SAFETY SECURITY POLICY.....	29
UNDERSTANDING AND OBTAINING CONSENT.....	30
SEXUAL HARASSMENT.....	30
BYSTANDER INTERVENTION.....	30
NON-DISCRIMINATION STATEMENT.....	30
TITLE VI CIVIL RIGHTS ACT OF 1964.....	30
TITLE VI COMPLAINT PROCEDURE.....	30
TITLE IX.....	31
TITLE IX COORDINATOR TRAINING.....	32
SUPPORTIVE MEASURES.....	35
INTERVIEWS AND INFORMATION GATHERING.....	36
ADVISORS.....	39
REPORTING REQUIREMENTS.....	42
ADDITIONAL INFORMATION.....	42
SECTION TEN: MISCELLANEOUS.....	43
JOB PLACEMENT AND CAREER FAIRS.....	43
ELECTRONIC COMMUNICATION POLICY.....	43
CHANGES IN PROGRAM.....	43
FACULTY AND STAFF OFFICE HOURS.....	43
SECTION ELEVEN: SCHEDULES AND CAMPUS CLOSURES FOR HOLIDAYS AND BREAKS.....	44
SCHEDULES.....	44

SECTION TWO: OUR SCHOOL

Penrose Academy is a 20,000 square foot school located at 13402 N. Scottsdale Road, Suite B160, Scottsdale, Arizona 85254 featuring educational curricula, equipment, technological learning tools and a Student Spa, Salon and MedSpa area for Cosmetology Hybrid, Hair Hybrid, Esthetics, Laser and Continuing Education.

The Academy's Student Salon has 69 stations with 12 shampoo back & side wash units. Our Esthetics Classrooms and Student Spa have 42 facial beds, 14 micro-needling devices, 30 sets of Esthetics equipment including high-frequency, galvanic, magnifying lamps and miscellaneous BT Gear. There are eight Microdermabrasion Machines with options for diamond tip.

Penrose Academy's MedSpa has the CoolSculpting Elite Platform, the Scarlet SRF, the Lumenis M22 containing the Universal IPL, ResurFX, and Q-Switched Nd:YAG hand pieces as well as the Lumenis SplendorX Alexandrite and Nd:YAG, ThermoClear and Venus Versa platform including IPL, AC, Viva, Octi Polar and Diamond Polar.

To provide a complete educational environment, Penrose Academy has created a facility that includes: Cosmetology Hybrid, Hair Hybrid, Esthetics and Laser Training Classrooms, Cosmetology Color Bar, Salon Dispensary and Laundry, Spa Dispensary and Laundry, Medspa, Admissions Office, Staff Lounge, Student Lounge, Student Lockers, Conference Room, Staff Offices and Library. For a current list of services performed in the student spa/salon/medspa, please visit our website.

ACCREDITATIONS AND MEMBERSHIPS

Penrose Academy is a proud member of the American Association of Cosmetology Schools (AACCS), a Pivot Point International Member School, a member of the Greater Phoenix Chamber of Commerce and accredited by the Commission of the Council on Occupational Education (COE) located at 7840 Roswell Rd. Bldg. 300, Ste. 325, Atlanta, GA 30350, by phone (520) 396-3898 or Toll Free at (800) 917-2081. Currently enrolled or potential students may obtain paper copies of the documents describing Penrose Academy's accreditation, approval and licensing upon request through the Student Services Department. Additional memberships and partnerships are listed at www.penrose.edu.

LICENSING AND CERTIFICATION

The Arizona Barbering and Cosmetology Board (AZBCB) has licensed Penrose Academy as a school to provide Cosmetology Hybrid, Hair Hybrid, and Esthetics programs. The AZBCB is located at 1740 W Adams, Suite #4400 in Phoenix Arizona and can be reached at (480) 784-4539. Penrose Academy is approved to offer cosmetic laser training through the Arizona Department of Health Services (ADHS). The ADHS is located at 150 North 18th Avenue in Phoenix, Arizona 85007 and can be reached at (602) 542-1025. Penrose Academy's current AZBCB school license to provide post-secondary education in the programs of Cosmetology Hybrid, Hair Hybrid, and Esthetics is posted in the display case at the front desk. The approval for ADHS is also available in the Student Services Department.

MISSION STATEMENT

Through meaningful educational experiences, Penrose Academy educates, empowers and connects students to their professional goals.

PENROSE ACADEMY DISCLOSURES

Penrose Academy does not guarantee employment. Penrose Academy prepares students for a license or certification only in the state of Arizona. These programs do not lead to licensure or certification in the other 49 states, nor any U.S. territories. At Penrose Academy, the student is the customer, not an employee and employment is not provided to students as part of a student's financial assistance package. Penrose Academy prepares students for an entry-level position in the Professional Beauty Industry. Penrose Academy maintains a no-tipping educational program. Penrose Academy does not, in whole or in part, have any written agreements with any other entity to offer educational programs.

HOURS OF OPERATION

Monday	8:30 AM – 9:00 PM
Tuesday	8:30 AM – 9:00 PM
Wednesday	8:30 AM – 9:00 PM
Thursday	8:30 AM – 9:00 PM
Friday	8:30 AM – 5:00 PM
Saturday	8:30 AM – 5:00 PM
Sunday	Closed

METHOD OF DISCLOSURES

Penrose Academy provides this Student Catalog directly to all enrolled students via our student app to disclose required consumer information, policies and procedures and to describe the information's availability and accessibility. This catalog will serve as one method of disclosing this required information. Some required consumer information must and will be available on the Penrose Academy Website www.penrose.edu such as the school's Annual Security and Safety Report, retention rates, placement rates and general information about the school and the student body diversity. This information will be referenced throughout this catalog. The exact electronic address to locate more detailed information on these topics will be provided and hyperlinked for convenience. Paper copies of all disclosures are available upon request during regular business hours through the Student Services, Financial Aid or Admissions Departments.

OBTAINING INFORMATION

Any student (enrolled or prospective) may obtain information on any of the following topics by contacting the persons designated to assist or by visiting the website through the provided electronic address as outlined below.

Information Type	Person/Department Designated to Assist	Contact Information
Financial Aid Information	Financial Aid Coordinator	financialaid@penrose.edu
Institutional Information	Student Services Department	studentservices@penrose.edu
Penrose Academy ADA Policy Information	President	studentservices@penrose.edu
Completion and Graduation Rates	Placement Coordinator	studentservices@penrose.edu
School Security Policies and Crime Statistics	Compliance Department	compliance@penrose.edu

COPYRIGHT INFRINGEMENT

Internet access is an important tool in the academic activity at Penrose Academy. WIFI is supplied to all staff, faculty and guests to enhance the learning experience. This benefit comes with great responsibility and risk. While accessing Penrose Academy's WIFI, all copyright laws governing music, movies, games and software over the internet must be adhered to and an individual must have the consent of the copyright holder to make copies. Unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject a student to civil and criminal liabilities.

Anyone who exploits any of the exclusive rights of copyright without the copyright owner's permission commits copyright infringement. If a lawsuit is brought in a court, the infringer will have to pay the copyright owner any amount of money made from using the work or any amount of money that the rightful owner would have made if the infringement had not happened.

If the copyright is registered with the U.S. Copyright Office, the infringer may also have to pay the copyright owner statutory damages, which is an amount set by the judge. In most cases this amount will usually be higher. In addition, an infringer may be found guilty on criminal charges and must pay criminal penalties.

If Penrose Academy receives an allegation of copyright infringement based on use of the school's computers or IP address by a student, the Director of Education will perform an investigation. If the investigation results with finding the student responsible, the student will be subject to disciplinary action including loss of network access, suspension or termination from school. Consequences of copyright infringement also include civil liability and criminal prosecution. A summary of the penalties may be found at <https://www.copyright.gov/title17/92chap5.html>

VACCINATION POLICY

Penrose Academy does not require students to receive any vaccinations for enrollment.

CONSTITUTION DAY

Every year during the week of September 17, Penrose Academy dedicates an interactive all school assembly to the celebration of Constitution Day. During this time, we review and discuss a book titled "THE U.S. Constitution And Fascinating Facts About It", reflect on the importance of active citizenship, recognize the enduring strength of our Constitution and we reaffirm our commitment to the rights and obligations of citizenship in this great nation.

VOTER REGISTRATION

Penrose Academy encourages all students to exercise their right to vote. If a student has not registered to vote, they may download the registration form, view the requirements and locate election date information at <https://azsos.gov/>.

SECTION THREE: INSTITUTION AND FINANCIAL INFORMATION

PENROSE ACADEMY STAFF AND FACULTY *(Please note that (*) indicates a part-time employee while (-) indicates an independent contractor)*

Nancy Meduna	CEO/Owner
Matt Meduna	Chairman/Owner
Ran McBryde-	Medical Director, NP, CLT
Nikki Parcels	President, Licensed Cosmetologist, Licensed Cosmetology Instructor, Certified Laser Technician, CLI
Bridget O'Brien	Sr. Director of Admissions & Financial Aid, Licensed Esthetician, BA Consumer Sciences
Cheri Parcels	Sr. Director of Operations and Guest Services
Missy Conti	Director of Education, Licensed Cosmetologist, Licensed Cosmetology Instructor
Candice Healey	Director of Medical Services, Licensed Esthetician, CLT, Certified Laser Instructor
Andria Young	Director of Student Services, Licensed Esthetician
Danielle Finn	Assistant Director of Financial Services & Financial Aid
Haleigh Trout	Assistant Director of Education, Licensed Cosmetologist, Licensed Cosmetology Instructor
Olga Cordova	Licensed Esthetician, Licensed Esthetics Instructor
Ivan Covarrubias	Laundry Assistant
Regina Knisely	Operations Coordinator
Bee Desantis	Licensed Cosmetologist, Licensed Cosmetology Instructor
Taylor Defoor	Licensed Esthetician, Licensed Esthetics Instructor, Student Services Assistant & Events Coordinator
Danielle Devor*	Licensed Cosmetologist, Guest Relations Coordinator
Briette Flake	Licensed Esthetician, Certified Laser Instructor
Parci Flake	Education Manager, Licensed Cosmetologist, Licensed Cosmetology Instructor
Annie Gandara*	Licensed Cosmetologist, Licensed Cosmetology Instructor
Lisa Gomez	Licensed Cosmetologist, Licensed Cosmetology Instructor
Kim Goedker*	Enrollment Services Coordinator
Madison Johnson	Licensed Esthetician, Licensed Esthetics Instructor
Courtney Kopel	Admissions Manager, Licensed Cosmetologist
Breanna Landa	Guest Relations Coordinator
Dabrienne Lewis	Licensed Cosmetologist, Licensed Cosmetology Instructor, Student Services & Events Coordinator
Khaila Matthews*	Guest Relations Coordinator
Drenise Matthews	Licensed Cosmetologist, Licensed Cosmetology Instructor
Jessica McCandless	Licensed Cosmetologist, Licensed Cosmetology Instructor
Mark Munoz*	Laundry Assistant
Tyler McDonald	Certified Laser Technician, Laser Educator, Guest Relations Coordinator
Araceli Mendoza	Front Desk Manager
Kendall Miliotes	Licensed Esthetician, Licensed Esthetics Instructor
Camryn Munoz	Student Services Assistant
Courtney Orem	Licensed Hairstylist, Admissions Coordinator
Kolleen Rice	Licensed Cosmetologist, Licensed Cosmetology Instructor
Mariah Richardson-Saika	Licensed Cosmetologist, Licensed Cosmetology Instructor
Yolanda Robinson	Licensed Esthetician, Admissions Coordinator
Alyssa Rojas	Assistant Front Desk Manager
Yazania Romero	Licensed Esthetician, Guest Relations Coordinator
Rachel Sheets	Licensed Esthetician, Licensed Esthetics Instructor, Certified Laser Technician, CLI
Madison Smith	Licensed Esthetician, Licensed Esthetics Instructor, Certified Laser Technician, CLI
Jessica Spillman	Licensed Esthetician, Licensed Esthetics Instructor, Certified Laser Technician
Shea Toohey	Licensed Esthetician, Licensed Esthetics Instructor, Certified Laser technician
Wendy Torres	Guest Relations Coordinator
Yessenia Torres	Enrollment Services Coordinator
Stephanie Toth	Esthetics Manager. Licensed Esthetician, Licensed Esthetics Instructor
Aliesia Vazquez	Licensed Esthetician, Esthetics Student Educator
Kira Watkins	Licensed Cosmetologist, Licensed Cosmetology Instructor

ADMISSIONS AND ENROLLMENT POLICIES AND PROCEDURES

ACADEMIC ADVISEMENT MEETING AND ADMISSIONS ASSESSMENT

Penrose Academy conducts an academic advisement meeting as part of the acceptance process. The academic advisement meeting is an essential step in the acceptance process that supports Penrose Academy in determining if an applicant's skills, experience, character and professionalism meet the criteria to complete the program of study successfully. In addition, the academic advisement meeting focuses on communication skills, motivation, maturity, and the ability to conduct oneself with responsibility, integrity, and accountability.

Penrose Academy provides academic advisement services to support and assist prospective students in planning for the occupational program they seek to pursue. In addition, Admission Coordinators collaborate with prospective students to help evaluate the occupational education program that aligns with their academic and career goals and personal interests.

EXPECTATIONS FOR PROSPECTIVE STUDENTS

Penrose Academy holds a limited capacity for students admitted into each program's start date. Therefore, to enroll in the requested program start date, the following expectations assist prospective students throughout the admissions process.

- Actively monitor emails and text messages.
- Commit to a set appointment date/time for attending an Academic Advisement Meeting and Admissions Assessment.
- Commit to expectations and due dates.
- Engage in an active dialogue and clarify personal values and goals.
- Maintain communication with Admissions and respond promptly throughout the process of becoming a student.
- Meet Penrose Academy's communication standards, responsibility, integrity, and accountability throughout enrollment.
- Seek guidance for academic and career planning.
- Understand failure to commit to a scheduled appointment and/or continuous rescheduling of appointments will delay the admissions and enrollment process by six months.

RESCINDING ADMISSION

Applicants who submit a document that is forged, fraudulent, altered, obtained inappropriately, materially incomplete, or otherwise deceptive may be denied admission or have their admission rescinded. Misconduct of those already enrolled when a fraudulent document is discovered is adjudicated using procedures specified in the Code of Conduct and may result in the rescission of admission, revocation of financial aid award, and permanent termination of enrollment. Penrose Academy reserves the right to rescind admission if Expectations for Prospective Students are unmet.

ENROLLMENT PROCEDURES

The requirements to be a student are 17 years of age, high school completion or GED and US citizenship, Permanent Resident, or DACA status. Prospective students must complete and meet the following enrollment conditions and criteria. Please note, Penrose Academy does not accept transfer hours.

1. Attend and complete the academic advisement meeting and assessment with an Admissions Coordinator.
2. Complete and submit the admissions application.
3. Submit a valid copy of a driver's license or photo ID and proof of Citizenship (voter registration card, birth certificate, passport, or permanent resident card). Eligible non-citizens submit a DACA card, form I-94, and State issued driver's license or state-issued Identification.
4. Submit a 400-word Letter of Intent describing reasons and goals for enrolling at Penrose Academy.
5. Submit proof of graduation (high school transcripts or high school equivalency transcripts) from a valid high school or high school equivalency program.
 - a. AZBCB rules and regulations will be followed if no GED or legitimate high school transcript, diploma, or equivalent is available.
6. Complete and pass the Aptitude Assessment. Penrose Academy utilizes an Aptitude Assessment to evaluate an individual's skills and potential for success in our programs. A minimum score of 75% is required to pass. Applicants that do not meet the minimum score of 75% will have the opportunity for a second attempt on an alternate date. Applicants that do not meet the requirements on either assessment will be required to wait six months before being eligible to retake the test. Individuals with request for accommodations, refer to section five: disability accommodations & grievance policy.
7. Submit non-refundable application fee of \$100.
8. Complete a Financial Strategy and set up a financial plan
9. Sign Financial contract and Student Catalog Acknowledgement.
10. Complete and sign Enrollment Agreement, I Understand form, Student Arbitration Agreement, and Waiver form.
11. Laser is a stackable credential; students must submit proof of previous experiences in the esthetics field, such as an esthetics license, cosmetology license, etc.
12. Veterans Education Benefits Processing & Records Management Requirements, 38 CFR 21.4253(d)(3). Students utilizing Veteran Benefits are required to submit proof of all education, military transcripts, and military training attended prior to attending Penrose Academy. All prior training and credit will be evaluated, and credit will be given if deemed similar or equivalent to the classes the students need to take to earn their diploma from this institution. This only applies to students utilizing Veterans Benefits.

ACCEPTANCE PROCEDURE

The Admissions Department reviews all applications for acceptance. Each application submitted must include all required information and supporting admissions materials described in the Enrollment Procedures section above. In addition, all applicants, including re-enrollments, must complete the entire becoming a student process. Once the applications are submitted, applicants are notified of their admission acceptance or denial in writing. Penrose Academy reserves the right to deny any applicant admission and to change entrance requirements without prior notice. Start dates are not guaranteed until the financial plan is finalized.

ENROLLMENT AGREEMENT

Penrose Academy outlines the responsibilities and obligations between the school and the student in the Enrollment Agreement, which is distributed and agreed to by the student and a Penrose Academy representative before the scheduled start date.

ENGLISH LANGUAGE PROFICIENCY ADMISSION REQUIREMENT

Students are advised that all educational materials, textbooks, and learning activities at Penrose Academy are conducted in English, including classroom activities, online education, student salon, student spa and student medspa areas, and professional development classes.

Applicants must provide documentation of English-language proficiency by submitting one of the following.

- U.S. high school diploma or equivalent (education completed in English).
- Documents verifying at least two years' service in the military.
- Postsecondary transcript or letter from the school's registrar verifying completion of courses with at least a C (70 percent) average from an institution where the language of instruction was English.

FOREIGN DIPLOMAS OR TRANSCRIPTS

Penrose Academy will accept a foreign diploma or transcript; however, the diploma or transcript must show education obtained is equivalent to a U.S. high school diploma and must be translated into English. It is the student's responsibility to have the foreign diploma or transcript translated and evaluated as part of the admission process. Since the cost of evaluating a foreign diploma or transcript must be incurred as a charge of admissions prior to enrollment in an eligible program, the fee cannot be included in the cost of attendance (COA). Student must provide a working email address and business website for verification purposes. Guidance on who to contact to secure an official translation and evaluation can be obtained from the Admissions Department.

HIGH SCHOOL COMPLETION POLICY

Penrose Academy is required to review and evaluate completion documentation of high school level education for each student. To ensure compliance, a transcript complete with date of graduation or GED certificate is required as a condition of enrollment. In addition, Penrose Academy verifies all high school transcripts, including home schooled certifications, before enrolling the prospective student. The responsibility for verifying the high school completion begins with an Enrollment Services Coordinator. The Enrollment Services Coordinator determines the legitimacy of the high school completion by confirming details through websites, accrediting agencies and submitted documents. After reviewing, the Enrollment Services Coordinator passes the high school completion onto the Sr. Director of Admissions & Financial Aid for a second and final review.

All students whose high school completion are not accepted, are notified by email and eligible to appeal the process, which may require obtaining more documentation. Any discrepancies or questionable documentation will be reviewed by a High School Completion Review Committee that includes the Financial Aid Department. If the Financial Aid Department is not available, the President determines the allowability. In addition, Penrose Academy keeps a list of invalid schools in Arizona to use as a reference to ensure all high school completion documentation is valid.

Penrose Academy does not accept Ability To Benefit (ATB) students. If assistance is needed in completing a GED program, online resources may be found here: <http://www.ade.state.az.us/adult-ed/gedhome.asp>

Penrose Academy is committed to equal educational opportunity and does not discriminate on the basis of age, gender, race, religion, sexual orientation, pregnancy, ethnicity/national origin, disability, perceived gender or gender identity in admissions, career services, or any other activities. Applications will not be denied admission on the basis of any of the foregoing factors. However, applications must meet all requirements specified for admission.

TRANSFER POLICY*

Penrose Academy does not accept the transfer of student credits or hours from other institutions. An individual who has completed hours or credits at another institution must understand that by enrolling in a similar program at Penrose Academy, they will start at zero hours and must complete all required hours to graduate from a program at Penrose Academy. Penrose Academy's programs are measured in clock hours (not credits) and may or may not be transferable to other educational institutions.

*VA beneficiaries must provide all proof of education. All prior training and credit will be evaluated, and credit will be given if deemed similar or equivalent to the classes the students need to take to earn their degree/certificate from this institution. This only applies to students utilizing VA benefits.

2024 PROGRAM START DATE CALENDAR*

Program	Jan	Feb	Mar	April	May	June	July	Aug	Sep	Oct	Nov	Dec
Cosmetology Hybrid		✓		✓		✓		✓		✓		✓
Hair Hybrid 4-day		✓		✓		✓		✓		✓		✓
Hair Hybrid 2-day								✓				✓
Esthetics 4-day	✓	✓	✓	✓	✓		✓	✓	✓	✓		✓
Esthetics 2-day			✓		✓			✓		✓		
Esthetics Nights		✓		✓		✓			✓		✓	
Laser										✓	✓	✓
Laser Middy		✓		✓			✓					
Laser Night	✓		✓	✓	✓		✓	✓				

2024 TUITION AND FEES

PROGRAM	COST OF TUITION	KIT FEE (books, supplies, tax)	APPLICATION FEE (non-refundable)	TOTAL INVESTMENT
Cosmetology Hybrid	\$18,320	\$2,530	\$100	\$20,950
Hair Hybrid	\$14,320	\$2,530	\$100	\$16,950
Esthetics	\$12,675	\$1,975	\$100	\$14,750
Laser	\$8,300	\$350	\$100	\$8,750

STUDENT KITS

Student kits are issued to each student on the first day of school and contain all the necessary tools and equipment to perform daily hands-on assignments and services on guests. To achieve a consistent, professional and efficient quality of education throughout the students' educational process, Penrose Academy selects proprietary items to include in this kit that follow our curriculum map. A representative from the Admissions Department will provide students with a list of required kit supplies for their program prior to enrollment and are given two options to acquire these items. The options will be explained in full detail to ensure both options provided are completely understood. All items purchased regardless of the option chosen, must be exact to the item description on the provided kit list and no substitutions will be permitted to maintain this consistency. All kit items are required to be in the student's possession on the start date regardless of the option chosen to acquire the item. Students must maintain equipment and replace broken or damaged articles to practice the hands-on portion of their education properly. Issued textbooks and kits must be in each student's possession every day.

ISBN/TEXTBOOK INFORMATION

Penrose Academy provides the International Standard Book Number (ISBN) and retail price information for textbooks and supplemental materials for each program to each student during the enrollment process.

MISCELLANEOUS SUPPLIES

Penrose Academy provides all equipment for all services performed in class and in the student spa/salon/medspa. The student understands that he/she may be required to incur additional costs for miscellaneous supplies or for misplaced or stolen items (all students are expected to secure kit items in their provided locker on campus or take items home). Additionally, the AZBCB requires specific tools/items for testing. Each student will be required to pay up to \$300 for his/her/their AZBCB Exam and licensing fees paid to Professional Credential Services, Inc. and AZBCB or \$30 for an ADHS Certificate application. Examination and licensing fees must be paid prior to taking the state exam. Each student will need to purchase these tools/items, not to exceed approximately \$300, prior to the first classroom day of the student's State Board preparation zone. Individuals licensed by the AZBCB or certified by ADHS will only be licensed/certified in the state of Arizona.

PAYMENT POLICY

Students can pay in one of three ways; pay in full, pay with lending from outside sources and lenders (this may include Title IV funds) or on a periodic basis directly to the school. Students paying on a periodic basis are expected to pay in full one month prior to graduation unless another payment option is approved. Students will follow the payment plan established in the Financial Plan. If a student misses a payment, the student will not be allowed to clock in and accrue hours, may incur over contract costs, will be charged a late fee and must pay for hours missed until the balance is paid in full. Penrose Academy may suspend the student until the balance is paid in full.

LATE FEE

Payments are due on the first of each month. If the payment is not received by 5:00pm on the 1st of the month, the student will incur a late fee of \$50 starting at 9:01pm on the 1st of the month as well as \$50 per day for every day thereafter.

PROCESSING FEE

All Students paying tuition with a credit card, debit card, and PayPal payments are subject to credit card processing fees.

PROGRAM REQUIREMENTS

Penrose Academy is required to collect personal data for verification of student identity. All costs associated with providing this data (diploma, certification, licensure, etc.) is the responsibility of the enrolling student.

REQUESTING ADDITIONAL PROGRAM HOURS

Any student requesting to attend additional hours beyond the completion and graduation of the enrolled program in order to fulfill additional hours for another state's licensure may do so with the President's approval. If the student is maintaining Satisfactory Academic Progress at the time of completion of the program, that student will be charged a fee of \$10 per hour in addition to the regular fees for all programs.

TRANSFER BETWEEN PROGRAMS

If a student requests to transfer between programs at Penrose Academy, the student must complete a Transfer Request Form and submit it along with the \$500 administrative fee to the Financial Aid department for a review of refund calculations. After Financial Aid has finished the review and calculations the transfer request will be submitted to the Student Services and Education department for review of scheduling/program availability. The review period for a transfer request may take up to 30 business days for determination. Upon approval, the student must withdraw from the currently enrolled program, where the refund policy will be applied as described in the Student Catalog and Enrollment Agreement. The student must then enroll in the new program and will incur all costs, fees and student kit costs as described in the Student Catalog except for the application fee. Financial Aid will be affected and could cause a possible delay. Due to the nature of each program's

curriculum delivery in sequential order and content, clock hours and academic courses may not transfer from one program to another.

The Hair Hybrid program is not eligible to transfer to the Cosmetology Hybrid program. Students in the Hair Hybrid program may enroll in the cosmetology Hybrid program after the completion of the Hair Hybrid program. Students must complete a Cosmetology Hybrid Continuation Request Form and submit it along with the \$500 administrative fee to the Financial Aid department for a review of tuition calculations and kits fees. After Financial Aid has finished the review and calculations the transfer request will be submitted to the Student Services and Education department for review of scheduling and program availability. The review period for a Cosmetology Hybrid Continuation may take up to 30 business days for determination.

TRANSFER TO DIFFERENT SCHEDULE

If a student requests to transfer to a different schedule at Penrose Academy, the student must complete a Transfer to Different Schedule Request Form and submit it along with the \$100 administrative fee to the Student Services department for a review of scheduling and program availability. The review period for a transfer request may take up to 30 business days for determination.

RECRUITING ACTIVITIES

Penrose Academy ensures that recruiting activities are ethical and materials used in recruiting accurately describe our mission, instructional outcomes, student performance expectations and completion requirements of our programs. Penrose Academy aspires to educate and conduct business to the highest ethical standard and all employees have signed our Code of Ethical Conduct acknowledging to abide by and adhere to these standards.

SCHOLARSHIPS

Penrose Academy may offer in house scholarships based on criteria decided by the President. Any student who withdraws or is terminated prior to completion of the full program hours will forfeit the scholarship. In addition, the amount of the scholarship will become due in full, including any monies as calculated and due from the Institutional Refund policy and Return to Title IV applied to the student's ledger per all withdrawals or termination. For more information on current scholarships, please visit www.penrose.edu.

ADDITIONAL FINANCIAL BENEFITS

Penrose Academy welcomes students eligible for receiving WIOA and Tribal benefits. Students using WIOA or Tribal benefits must complete all enrollment procedures as previously listed in the Admissions section.

FINANCIAL AID

Penrose Academy does not endorse or recommend any one lender for financial assistance and will work with whichever lender a student chooses. Financial Aid is available to those who qualify. Qualified individuals who choose to accept any financial aid offers are responsible to repay any loans, private or Title IV, regardless of whether the student is successful in completing the program and obtaining employment.

Financial Aid student eligibility criteria and general information can be found at www.studentaid.gov. All Title IV funds are awarded based on each student's individual eligibility. A student's eligibility will be determined by filing a Free Application for Federal Student Aid (FAFSA). The application can be found online at www.studentaid.gov. The student must be fully enrolled at Penrose Academy before any Title IV aid will be disbursed on the student's behalf. All information regarding student loans and Parent PLUS loans will be submitted to the National Student Loan Data System (NSLDS) and will be accessible by guaranty agencies, lenders and institutions determined to be authorized users of the data system.

Once a valid FAFSA has been received on campus, the student's eligibility will be presented to the student. At this time, a financial aid representative will contact the student to inform them of their eligibility, terms and conditions of the student loan(s) as well as the student's right to decline any aid.

Private education loans are also available to students. Penrose Academy does not have a preferred lender list and encourages students and parents to obtain funding from any institution that offers the best terms and conditions and to always compare terms with Title IV funds.

If the student has Title IV loans in repayment, they may defer repayment on the loans while enrolled full time at Penrose Academy. For assistance in deferring student loans, please contact the Financial Aid Department at 408.222.9540 or by email at financialaid@penrose.edu.

All students maintain the right to reject any financial aid or other assistance. A Financial Aid representative is available for questions and assistance including information on terms of any loan received by a student as part of the financial assistance package, sample loan repayment schedules for sample loans and the necessity for repaying loans at Penrose Academy, 480.222.9540 or by email at financialaid@penrose.edu. Please refer to our website www.penrose.edu for more information on graduation rates, placement rates, median student loan debt and other consumer information required by the U.S. Department of Education.

Penrose Academy uses a local average for the cost of attendance expenses through a student survey. Budgets are calculated by multiplying the advertised completion time of each program by the monthly figure for each budget component. Please contact the Financial Aid Department for further information. The budgeting figures for the 2020-2021 Award Year are as follows:

Living with Parents/No Dependents		All Others	
Room and Board	\$881 per month	Room and Board	\$1,879 per month
Transportation	\$459 per month	Transportation	\$553 per month
Personal/Miscellaneous	\$613 per month	Personal/Miscellaneous	\$263 per month

LOAN COUNSELING

Students choosing to participate in Federal Financial Aid will be contacted to communicate the student's estimated total award, make decisions on all loans, and, if accepting loans, to schedule a loan counseling session with a Financial Aid representative. The student is also required to complete the U.S. Department of Education online entrance counseling session and sign a Master Promissory Note (MPN) at <https://studentloans.gov>.

Loan Entrance Counseling will review information such as the Financial Aid Award Letter, Title IV Authorization Form and the Master Promissory Note (MPN). Students choosing to participate in Federal Financial Aid must complete the online Entrance Loan Counseling prior to any funds being disbursed.

The table below outlines the disbursement schedule of each program:

PROGRAM	1	301	451	901	1201
Cosmetology Hybrid	✓		✓	✓	✓
Hair Hybrid	✓		✓	✓	
Esthetics	✓	✓			

Any student borrowing funds for the first time will experience a delay of Direct Loan disbursement for 30 days.

Upon completion, withdrawal or termination of a program, a student who has received student loans must complete an exit interview with the Financial Aid representative. Additionally, online Exit Counseling must be completed at www.studentaid.gov, before the student will be considered having met all graduation requirements and is mandatory prior to releasing the student's hours to the AZBCB.

MAINTAINING FINANCIAL AID ELIGIBILITY

Students must maintain a 95% attendance and an 80% GPA in order to be considered making Satisfactory Academic Progress (SAP) in a program for the purpose of receiving financial assistance. Please refer to the Satisfactory Academic Progress (SAP) section in this catalog for more information.

STUDENT'S RIGHT TO CANCEL

This agreement and the student's enrollment can be terminated only by written notice from one party to the other. Said notice or cancellation, if by student, must be in writing and shall be emailed, mailed, or delivered to Penrose Academy's Student Services Department or President in person. If Penrose Academy is terminating the student, all documentation will be done onsite unless the student does not return to school, which will then result in Penrose Academy mailing all documentation. Said cancellation is effective upon postmark of the notice or date notification is delivered in person. The refund policy is outlined below. If a student does not notify Penrose Academy that he/she is withdrawing, formal termination shall be based on the 14th consecutive calendar day of no communication and/or staff determination. Refund/Amount Due policy and Return to Title IV will be based on the last day of attendance per each policy.

REFUND/AMOUNT DUE POLICY

All refunds are calculated as of the student's last date of attendance. If the student withdraws, he/she shall be fully responsible for all amounts defined below. Any monies to be returned to the student shall be refunded within 45 days of written cancellation or withdrawal notice by the student, from the date we terminate the student or determine withdrawal by the student, regardless of notice received from the student. If amount due is owed to Penrose Academy by the student, the student has 60 days to make the payment or commit to a payment plan if approved by President.

If written notice of withdrawal is received by Penrose Academy on the day of the start of coursework or prior, Penrose Academy will retain or require only the nonrefundable application fee of \$100, unless class is canceled by administration after enrollment, then all monies will be refunded within 45 days of the start date.

Upon commencement of scheduled hours there is no refund for kit items and books received by the student.

The following table outlines the refund amounts by percentages, not to include the non-refundable application fee as described above, student kit fee and where applicable administrative fees, if a student withdraws or is terminated after the first day of coursework and upon commencement of scheduled hours. "Scheduled Hour(s)" means the hours defined by Penrose Academy course calendar, regardless of whether a student was in attendance.

Percentage of Total Scheduled Hours to Program Length	Total Actual Hours Scheduled				Percentage of Tuition Owed to Penrose Academy	Percentage of Tuition Penrose Academy Will Refund
	Cos Hybrid (1500)	Hair Hybrid (1000)	Esthetics (600)	Laser (88)		
Up to 10%	1-149	1-99	1-59	1-7	10%	90%
After 10% until the end of 25%	150-374	100-249	60-149	8-21	50%	50%
After 25% until the end of 50%	375-749	250-499	150-299	22-43	75%	25%
After 50%	750-1500	500-1000	300-600	44-88	100%	0%

REFUND TIME FRAME

Any amounts to be refunded to the student shall be paid within 45 days of Penrose Academy receiving written notification of withdrawal or termination. If amount due is owed to Penrose Academy by the student, the student has 60 days to make the payment or risk their account going to collections.

RETURN OF TITLE IV FUNDS (R2T4)

As stated in the Refund/Amount Due Policy, any student who has not visited the school prior to enrollment may withdraw without penalty within three days of attending orientation or visiting the school. If student withdraws or has enrollment terminated, the following policy is set forth for all Title IV funds:

Federal Financial Aid is awarded to student contingent upon the student attending classes and successfully completing the entire payment period. If the student fails to complete the payment period successfully, the student may be responsible for repaying part or all of the Federal Financial Aid. The Financial Aid office is required by federal regulations to recalculate federal financial aid eligibility for students who withdraw, drop out, are terminated (voluntary or involuntary) or take a leave of absence (extreme crisis; only upon approval by President) prior to completing 60% of a payment period.

Earned Title IV Funds are federal Title IV funds used to cover education costs according to the length of time the student was enrolled before withdrawing. The amount of funds earned is directly proportional to the time enrolled, through 60% of a payment period; the financial aid office recalculates eligibility for Title IV funds. Recalculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula:

Percentage of payment period completed the number of clock hours the student was scheduled to complete in the period as of the day the student withdrew divided by the total clock hours in the payment period. This percentage is also the percentage of earned aid. If a student earned less aid than was disbursed, Penrose Academy would be required to return a portion of the funds and the student would be required to return a portion of the funds. Keep in mind that when Title IV funds are returned, the student borrower may owe a balance to Penrose Academy. If a student earned more aid than was disbursed to him/her, Penrose Academy would owe the student a post-withdrawal disbursement which must be paid within 180 days of the student's withdrawal. Penrose Academy must return the amount of Title IV funds for which is responsible no later than 45 days after the date of the determination of the student's withdrawal.

Refunds are allocated in the following order:

1. Unsubsidized Direct Stafford Loans (other than PLUS loans)
2. Subsidized Direct Stafford Loans
3. Direct PLUS Loans
4. Federal Pell Grants for which a return of funds is required

COVID R2T4 POLICY

The above-mentioned policy is still in place regarding the R2T4 processing. However, for those students who began attendance in a payment period that began on or includes March 13, 2020 with a qualifying COVID-19 emergency, the following exceptions will be made:

1. An R2T4 calculation will be processed as required by the U.S. Department of Education.
2. An automatic waiver of Title IV funding to be returned will be applied, meaning no funding will be returned at this time. This waiver will remain in place until further guidance is received from the Department of Education.
3. No adjustments will be made to the Department of Education (COD) or to the student ledger.
4. If the R2T4 results in a credit balance, the credit balance will be paid to the student within 14 days.

WITHDRAWAL/TERMINATION

Students who withdraw from any program are required to empty the assigned locker and gather all personal items. Any items left behind by the student will be stored for 30 days, at which time the items become the property of Penrose Academy. Students wishing to transfer to another institution must pay all monies owed to Penrose Academy and all applicable academic requirements must be met for the hours to be released. Upon withdrawal or termination, access to the online learning portal will be disabled.

RE-ENROLLMENT

In the case of the following situations, students may pay a re-entry fee of \$500, in addition to any over contract costs on the contracted graduation date and/or change in tuition costs:

- a. Student was terminated from a program for not meeting SAP and allowed re-entry through the formal appeal process, submitting a written appeal to the President within 30 days of termination. An appeal submitted after 30 days of termination, will not be accepted and the student will be ineligible for re-enrollment.
- b. Student withdrew from a program meeting Satisfactory Academic Progress and decided to re-enroll in the same program within a 12-month period or approved by the President. In extreme cases, the President reserves the right to waive re-enrollment fee.
- c. Re-enrollment after 12 months or after any curriculum changes could require complete re-enrollment at Hour 1/Zone 1 and purchase of new kit with approval of Director of Education.
- d. A technical evaluation by the Director of Education may be required for re-entry.
- e. Requests for re-enrollment must be made three months prior to the desired start date.

Re-entry is allowed after withdrawal based on full payment of prior balance owed to Penrose Academy, provided there is availability in a future class start date. Extenuating circumstances will be reviewed by the President on a case-by-case basis.

REQUIREMENTS FOR AN APPEAL LETTER

- Heading: Include your contact information and the date.
- Addressed: Address it to the relevant person or department.
- Introduction: State the purpose of the letter and mention the decision you're appealing.
- Reason for Appeal: Explain why you believe the decision was incorrect, with supporting evidence.
- Supporting Documents: Attach relevant documents.
- Proposed Resolution: Describe what you hope to achieve through the appeal.
- Signature: Sign it by hand or digitally.
- Contact Information: Ensure your contact details are accurate.

COLLECTIONS POLICY

If a student or guarantor has a balance owed to Penrose Academy at the time of withdrawal/graduation, payment must be made within 60 days of withdrawal. If payment plans are necessary, the maximum term is 60 months.

Any unpaid accounts aged 60 days will be referred to a collection agency for resolution. Should Penrose Academy incur collection costs or legal fees under this agreement, the student/guarantor promises to be responsible for charges incurred, to pay all additional costs, charges, collection fees and expenses, including reasonable attorney's fees and costs.

OVER CONTRACT CHARGES

Students who attend past the scheduled hours must pay the remaining hourly fee as listed below (please note that the contracted graduation date will differ from the date of the graduation ceremony). Any hours missed throughout the program may place the student in over contract and the student would incur charges below. While documentation does not reduce over contract fees, students with extreme documented medical conditions may have the over contract charges reviewed by the President. Students with documented mental and/or physical disabilities will be eligible for a review of charges as they relate to the disability.

All over contract charges must be paid in full before a graduate's proof of completing scheduled hours will be sent to the AZBCB or ADHS, Bureau of Radiation Control.

However, if a graduate can provide proof of acquiring an industry related position, Penrose Academy will submit the documents to AZBCB or ADHS, Bureau of Radiation Control after the graduate has made a partial payment and agreed to pay all over contract fees over a period of six months.

Students who do not pay the over contract fee balance in full on the student's final day, will be considered for an auto-pay payment plan that is set up using a credit card. If the student agrees to and sets up the auto-pay payment plan, Penrose Academy will release the student's hours to the AZBCB. If a graduate's scheduled auto-pay payment is declined, the account will be sent to collections.

If a student does not agree to an auto-pay payment plan for the over contract fee balance, the student's hours will be withheld by Penrose Academy preventing completion of program until balance is paid in full. Once the student's balance is paid in full, Penrose Academy will release the hours to the AZBCB. If a graduate's scheduled auto-pay payment is declined, the account will be sent to collections.

Penrose Academy offers opportunities for students to makeup hours throughout enrollment in a program. Bonus hours may be offered throughout the week outside of student scheduled hours. Students must check the Penrose App for bonus hour opportunities. Refer to the Bonus Hours and Minimizing Over Contract Fees section for more information. For students with accommodations and/or failed SAP checkpoints (on attendance probation), individual arrangements will be made.

OVER CONTRACT CHARGES AND GRACE PERIODS (FREE OF CHARGE)

Students must complete the required number of hours to graduate. If a student has missed any scheduled hours due to an absence, the student must continue attending school after the contract graduation date and accrue hours 'over contract' to compensate for any hours missed, until a student has clocked the number of hours required for completion of the enrolled program. Students needing to attend school after the contract graduation date to complete required hours will adhere to the following over contract guidelines:

Enrolled Program	Total Over Contract Hours Charged \$0.00 per hour (free of charge)	Total Over Contract Hours Charged \$10.00 Per Hour
Cosmetology Hybrid	1-60	61+
Hair Hybrid	1-45	46+
Esthetics	1-30	31+
Laser*	1-8	9+

*Laser students experiencing extreme medical conditions must have over-contract hours approved by the President.

EXCUSED ABSENCES

An excused absence will be granted when a student is on an educational trip such as Study in the States and Study Abroad. Excused absences may also be granted when a student is absent from school for a circumstance identified as legitimate, valid and/or reasonable by the President and/or Director of Education, such as a death in the immediate family or mandatory military leave.

BONUS HOURS AND MINIMIZING OVER CONTRACT FEES

Penrose Academy offers opportunities for students to makeup hours throughout enrollment in a program. Bonus hours may be offered throughout the week outside of student scheduled hours. Students must check the Penrose App for bonus hour opportunities. Students may only participate in these bonus hours if attendance is under 100% and may not use bonus hours as an opportunity to fast track through the program. Penrose Academy's Education Department will oversee curriculum during these hours. Bonus hours are a privilege and if a student breaks any policies, the student may lose the opportunity to participate. For students with accommodations and/or failed SAP checkpoints (on attendance probation), individual arrangements will be made.

SATISFACTORY ACADEMIC PROGRESS (SAP)

Satisfactory Academic Progress (SAP) in academic work and attendance is a requirement for all Penrose Academy students. SAP helps ensure students are moving toward successful completion of the program in a timely manner or risk losing Financial Aid eligibility, incur fees or loss of enrollment.

Satisfactory Academic Progress includes maintaining an 80% Cumulative GPA and a 95% attendance. Penrose Academy will round up percentages to the nearest hundredth, for example, a student with an attendance of 94.5 or above will be rounded up to 95% attendance.

Penrose Academy determines SAP by monitoring students throughout enrollment and completing a formal evaluation at an "evaluation checkpoint." Evaluation checkpoints for enrolled students receiving Financial Aid are scheduled at the end of the first payment period for Esthetics programs; at the end of the first and second payment periods for students enrolled in the Hair Hybrid Program; and at the end of the first, second and third payment periods for students enrolled in the Cosmetology Hybrid Program, using a 900-hour academic year for the purposes of Title IV.

EVALUATION CHECKPOINTS

PROGRAM	1	301	451	901	1201
Cosmetology Hybrid	✓		✓	✓	✓
Hair Hybrid	✓		✓	✓	
Esthetics	✓	✓			

Students who meet all expectations and requirements at the time of the evaluation checkpoint, including both attendance and academics, will be considered as making Satisfactory Academic Progress (SAP) and are eligible to receive financial aid disbursements if they qualify.

Failure to meet SAP will lead to enrollment termination, rendering the student ineligible for Title IV financial aid unless an appeal is approved. Students failing to meet attendance and/or academic progress requirements at an evaluation checkpoint will receive written notification or be notified through the Penrose Academy App by the Student Services department.

Student may be placed on "Warning" or "Probation" (pending a successful appeal process) or have Financial Aid terminated. Students in Cosmetology Hybrid, Hair Hybrid, and Esthetics programs are expected to complete within a 150% timeframe unless otherwise approved by the President.

If a student can provide medical documentation such as proof of a doctor's appointment, proof of surgery or proof of hospitalization to account for hours missed from the program, these hours will not count against the student when calculating SAP attendance checkpoints. All documentation should be submitted to Student Services upon return to school and will not be applied if presented after the student has hit an SAP checkpoint.

WARNING

If a student fails to meet Satisfactory Academic Progress (SAP) at an evaluation checkpoint, they will receive a written warning notification from the Student Services department, putting them at risk of enrollment termination.

Penrose Academy may consider it reasonable to believe that the student can meet SAP at the next evaluation checkpoint and, therefore, assigns a "Warning" status. Students under a "Warning" remain eligible for Title IV Financial Aid. However, at the next evaluation checkpoint, the student is expected to meet SAP. Failure to do so will result in a notification of enrollment termination.

A student who has previously received a warning notification, putting them at risk of enrollment termination, and fails to re-establish satisfactory status will face termination at the second SAP checkpoint.

PROBATION

Students failing to meet Satisfactory Academic Progress (SAP) for two consecutive checkpoints will receive a notice of failed SAP and be placed on suspension. During this period, they may not return to their program until the appeal process is completed. The student will be informed of the appeal process, as explained below.

Upon approval of the appeal, the student will be placed on "Probation" and allowed to receive Title IV Financial Aid if the plan for improving SAP is followed within a specified time frame. Valid medical documentation may be used to excuse absences during the probation period.

RE-ESTABLISHING SATISFACTORY ACADEMIC PROGRESS (SAP)

If a student has been placed on probation and is meeting the minimum requirements for both academics and attendance at the end of the probationary period, by making up missed hours and failed tests, the student may re-establish Satisfactory Academic Progress and eligibility of Title IV Funding.

SAP APPEAL PROCESS

If a student fails to meet SAP, they can appeal for reconsideration and be placed on "Probation," allowing them to resume enrollment and receive Title IV Financial Aid.

1. Student is placed on suspension.
2. Student files an appeal within 3 business days.
3. The Director of Student Services notifies the student of the appeal date and time.
4. The "Board of Grievances," appointed by the Director of Student Services and consisting of staff members, reviews the written appeal. They may request an in-person interview with the student. A determination is made and provided to the student in writing within 10 business days with the following outcomes:
 - If the SAP appeal is granted, the student is placed on "Probation" and provided a Corrective Action Plan (CAP). The CAP outlines specific actions and deadlines for the student to maintain Financial Aid eligibility and enrollment, progressing toward successful program completion. The CAP may extend beyond one evaluation checkpoint, and the student is eligible to receive Title IV Financial Aid while following it.
 - If the appeal is denied, the student is terminated, and if applicable, Title IV Financial Aid is not reinstated, with the student being notified.
 - If the student fails to maintain the CAP by the next evaluation checkpoint, termination occurs, and if applicable, Title IV Financial Aid eligibility is lost.

ACADEMIC WORK

Students engage in theory and practical assignments, special projects and hands-on learning. Theory is evaluated by written exams following each unit of study. Practical assignments are evaluated throughout the program and prior to performing services in the Student Salon, Student Spa and Student MedSpa. Practical skills are evaluated according to textbooks and educator guidelines provided in each practical and any potential performance standards established by the AZBCB and ADHS. Students must maintain a cumulative grade point average of 80% or higher to be considered maintaining Satisfactory Academic Progress. Academics are monitored monthly by Penrose Academy staff/faculty. Student's progress through the programs in zones: The Cosmetology Hybrid program is organized into six zones, the Hair Hybrid program has four zones on the four-day schedule and five zones on the two-day schedule, the Esthetics four-day program is organized into four zones, the Esthetics two-day and night programs are organized into three zones and the Laser program has two zones. All students are required to pass a final written and practical exam prior to graduation.

GRADING SCALE

A	B	C	D	F
95-100	90-94	86-89	80-85	79 and below

Penrose Academy allows one exam re-take if the score received is below 80%. However, the maximum grade a student may receive on the re-taken exam is an 80%. A student may appeal a grade given through the appeal process as described in this Student Catalog. Additionally, all retakes or makeup exams must be scheduled by the classroom educator and taken within the same academic zone as the exam was scheduled.

ACADEMIC AUDITS

Student progress is audited on occasion and without notice by the Director of Education. Hours attended, and exams/tests taken are two criteria used to determine if a student may move into the next zone of study. If a student has failed a course or zone, that student may be required to re-take the zone with a passing grade as determined by the Director of Education. Additional audits may be added throughout the program and without notice.

GRADUATION REQUIREMENTS

Penrose Academy has set forth the following requirements for completion of a program and does not guarantee licensure in any state. Satisfying the AZBCB requirements, including:

1. Completing contracted amount of program hours
2. Maintaining an 80% or higher academic grade point average throughout the program
3. Maintaining a 95% or higher attendance average throughout the program
4. Follow all rules and regulations of the AZBCB and Penrose Academy
5. Complete payment of all tuition, fees and charges to the school prior to graduation, unless approved by President
6. Successful completion of a Final Exam
7. Complete Exit Counseling for all federal loan recipients

After these requirements have been met, Penrose Academy will present the student a Penrose Academy diploma. In the state of Arizona, to practice cosmetology, hairstyling or esthetics services on the public, one must take and pass the Arizona State Licensure Exam, administered by the AZBCB and receive a license to practice learned skills on the public. To practice cosmetic laser treatments on the public upon successful completion of a laser technician program, one must submit an application to, and receive a current certificate from, the ADHS.

DISTANCE EDUCATION

Distance Education is defined as learning that students will complete online and off campus. Students will log on to the Penrose Academy online learning platform. They will be assigned theory chapters or sub-chapters to complete as assigned by the classroom educator.

Students are scheduled two to nine and a half hours a week for distance education depending on enrolled program. These hours are calculated towards the student's contract date. All hours must be completed by logging into the online platform for the student to graduate by the student's contract date.

Students are not permitted to work on these assignments during school hours, unless during scheduled check-ins with zone educators or administrative staff for academic counseling, which is highly encouraged. The zone educator or a member of Penrose Academy's Education Department will interact, and monitor student's progression and completion and the Director of Education and Student Services department will monitor all student activity using the online platform.

To receive the full amount of the scheduled hours weekly for each specific assignment, the student must log the actual hours in the platform by the assignment due date. Upon completion of distance education assignments, the hours recorded using the online learning platform will be entered in the student software program and submitted to the AZBCB.

The student registered and enrolled in the Distance Education program must be the same student participating and completing the academic work to receive the academic credit and hours. Only the exact amount of time spent learning on the Penrose Academy Online Platform will be submitted, not to exceed the scheduled hours weekly.

STUDENT SERVICES

Students are routinely advised on attendance and academic issues. Penrose Academy Student Services department makes reasonable effort to maintain close communication with all students and monitors student progress throughout their programs as well as after graduation. Students have access to faculty and administrative staff for both career and academic advising.

Student Services staff members are available to help students with test retakes, academic accommodations, Satisfactory Academic Progress (SAP), attendance, academic counseling and job placement during office hours. Penrose Academy's policies and procedures are available digitally and printed upon request to Student Services. Students experiencing personal problems that require professional help will be referred to the appropriate agency(s) or organization(s).

SECTION FOUR: VETERAN'S EDUCATION BENEFITS

Penrose Academy is qualified to accept Veterans Education Benefits for those who qualify (Esthetics and Laser programs only). Veterans and dependents of veterans will need to contact VA to apply for and determine benefit coverage. The website to apply/inquire is <http://va.benefits.vba.va.gov/vonapp/main.asp>.

Academy will review all submissions and grant credit as deemed appropriate; Academy is not approved for Yellow Ribbon benefits.

TITLE 38 us Code 3679

In accordance with Title 38 US Code 3679 subsection (e), (Ch. 31 and Ch. 33) Penrose Academy will not prevent a student's enrollment, assess a late penalty fee, require a student to secure alternative funding, or deny a student access to any educational resources available to other students who have satisfied their tuition and other fees, upon any pending payments from the VA.

PENROSE ACADEMY REFUND POLICY FOR VETERAN BENEFITS

If written notice of withdrawal is received by Penrose Academy on the day of the start of coursework or prior, Penrose Academy will retain or require only the nonrefundable application fee of \$100. Upon commencement of Scheduled Hours there is no refund for kit items and books received by the student.

The table below outlines the refund amounts by percentages, if a student withdraws or is terminated after the first day of coursework and upon commencement of scheduled hours.

Percentage of Total Scheduled Hours to Program Length	Percentage of Tuition Owed to Penrose Academy	Percentage of Tuition Penrose Academy Will Refund
Up to 10%	10%	90%
After 10% up to 20%	20%	80%
After 20% up to 30%	30%	70%
After 30% up to 40%	40%	60%
After 40% up to 50%	50%	50%
After 50%	100%	0%

ACADEMIC WORK FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

Students engage in theory and practical assignments, special projects and hands-on learning. Theory is evaluated by written exams following each unit of study. Practical assignments are evaluated throughout the program and prior to performing services in the Student Spa and Student MedSpa. Practical skills are evaluated according to textbooks and educator guidelines provided in each practical and any potential performance standards established by the AZBCB and ADHS. Students must maintain a cumulative grade point average of 80% or higher to be considered maintaining Satisfactory Academic Progress. Academics are monitored monthly by Penrose Academy staff/faculty. Student's progress through the programs in zones: Esthetics will go through Zones 1-4 and Laser will go through Zones 1-2. All students are required to pass a final written and practical exam prior to graduation.

GRADING SCALE FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

A	B	C	D	F
95-100	90-94	86-89	80-85	79 and below

Penrose Academy allows one exam re-take if the score received is below 80%. However, the maximum grade a student may receive on the re-taken exam is an 80%. A student may appeal a grade given through the appeal process as described in this Student Catalog. Additionally, all retakes or makeup exams must be scheduled by the classroom educator and taken within the same academic zone as the exam was scheduled.

SATISFACTORY ACADEMIC PROGRESS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

Satisfactory Academic Progress (SAP) in academic work and attendance is a requirement for all Penrose Academy students. SAP helps ensure students are moving toward successful completion of the program in a timely manner or risk losing Veterans Education Benefits eligibility, incur fees or loss of enrollment.

Satisfactory Academic Progress includes maintaining an 80% Cumulative GPA and a 95% in Attendance. Penrose Academy will round up percentages to the nearest hundredth. For example, if a student with an attendance of 94.5% the percentage will be rounded up to a 95% attendance.

Penrose Academy determines Satisfactory Academic Progress by monitoring students throughout enrollment and completing a formal evaluation at an "evaluation checkpoint." Students meeting all expectations and requirements at the time of evaluation checkpoint, both attendance and academics, will be considered making Satisfactory Academic Progress and are eligible to receive veteran's education benefits disbursements.

EVALUATION CHECKPOINTS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

PROGRAM	30	60	300	450
Esthetics			✓	✓
Laser	✓	✓		

Students who meet all expectations and requirements at the time of the evaluation checkpoint, including both attendance and academics, will be considered as making Satisfactory Academic Progress (SAP) and are eligible to receive veteran's education benefit disbursements if they qualify.

Failure to meet SAP will lead to enrollment termination, rendering the student ineligible for veteran's education benefits unless an appeal is approved. Students failing to meet attendance and/or academic progress requirements at an evaluation checkpoint will receive written notification or be notified through the Penrose Academy App by the Student Services department.

A student may be placed on "Warning" or "Probation" (pending a successful appeal process) or have veteran's education benefit eligibility terminated. Students in Esthetics and Laser programs are expected to complete within a 150% timeframe unless otherwise approved by the President.

If a student can provide medical documentation such as proof of a doctor's appointment, proof of surgery, or proof of hospitalization to account for hours missed from the program, these hours will not count against the student when calculating SAP attendance checkpoints. All documentation should be submitted to Student Services upon return to school and will not be applied if presented after the student has hit an SAP checkpoint.

WARNING FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

If a student fails to meet Satisfactory Academic Progress (SAP) at an evaluation checkpoint, they will receive a written warning notification from the Student Services department, putting them at risk of enrollment termination.

Penrose Academy may consider it reasonable to believe that the student can meet SAP at the next evaluation checkpoint and, therefore, assign a "Warning" status. Students under a "Warning" remain eligible to receive veteran's education benefits. However, at the next evaluation checkpoint, the student is expected to meet SAP. Failure to do so will result in a notification of enrollment termination.

A student who has previously received a warning notification, putting them at risk of enrollment termination, and fails to re-establish satisfactory status will face termination at the second SAP checkpoint.

PROBATION/SAP FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

Students failing to meet Satisfactory Academic Progress (SAP) for two consecutive checkpoints will receive a notice of failed SAP and be placed on suspension. During this period, they may not return to their program until the appeal process is completed. The student will be informed of the appeal process, as explained below.

Upon approval of the appeal, the student will be placed on "Probation" and allowed to receive veteran's education benefits if the plan for improving SAP is followed within a specified time frame. Valid medical documentation may be used to excuse absences during the probation period.

RE-ESTABLISHING SATISFACTORY ACADEMIC PROGRESS (SAP) FOR STUDENTS RECEIVING VETERAN'S EDUCATION BENEFITS

If a student has been placed on probation and is meeting the minimum requirements for both academics and attendance at the end of the probationary period by making up missed hours and failed tests, the student may re-establish Satisfactory Academic Progress and eligibility for veteran's education benefits.

SAP APPEAL PROCESS FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

If a student fails to meet SAP, they can appeal for reconsideration and be placed on "Probation," allowing them to resume enrollment and receive veteran's education benefits.

1. Student is placed on suspension.
2. Student files an appeal within 3 business days.
3. The Director of Student Services notifies the student of the appeal date and time.
4. The "Board of Grievances," appointed by the Director of Student Services and consisting of staff members, reviews the written appeal. They may request an in-person interview with the student. A determination is made and provided to the student in writing within 10 business days with the following outcomes:
 - If the SAP appeal is granted, the student is placed on "Probation" and provided a Corrective Action Plan (CAP). The CAP outlines specific actions and deadlines for the student to maintain eligibility for veteran's education benefits and enrollment, progressing toward successful program completion. The CAP may extend beyond one evaluation checkpoint, and the student is eligible to receive veteran education benefits while following it.
 - If the appeal is denied, the student is terminated, and if applicable, the veteran's education benefits are not reinstated, with the student being notified.
 - If the student fails to maintain the CAP by the next evaluation checkpoint, termination occurs, and if applicable, the veteran's education benefits eligibility is lost.

OVER-CONTRACT FEES FOR STUDENTS RECEIVING VETERANS EDUCATION BENEFITS

Veteran's education benefits cannot be extended to cover any over-contract fees accrued by a student exceeding the program length.

TRANSFER POLICY*

Penrose Academy does not accept the transfer of student credits or hours from other institutions. An individual who has completed hours or credits at another institution must understand that by enrolling in a similar program at Penrose Academy, they will start at zero hours and must complete all required hours to graduate from a program at Penrose Academy. Penrose Academy's programs are measured in clock hours (not credits) and may or may not be transferable to other educational institutions.

*VA beneficiaries must provide all proof of education. All prior training and credit will be evaluated, and credit will be given if deemed similar or equivalent to the classes the students need to take to earn their degree/certificate from this institution. This only applies to students utilizing VA benefits.

SECTION FIVE: DISABILITY ACCOMMODATION & GRIEVANCE POLICY

STATEMENT OF NON-DISCRIMINATION AND ACCOMMODATION

Penrose Academy does not discriminate on the basis of disability in its admissions practices or other policies. The licensing requirements and physical expectations for courses offered at the school may restrict some applicants. Questions regarding licensing requirements and the physical expectations of the industry may be answered by the President.

Penrose Academy is committed to providing accommodations for enrolled students who have documented disabilities and are entitled to a reasonable accommodation to ensure that they have full and equal access to the educational resources at Penrose Academy under Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) ("Section 504") and the Americans with Disabilities Act of 1990 (42 U.S.C. § 12182) ("ADA") and their related statutes and regulations. Section 504 prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. The ADA prohibits a place of public accommodation from discriminating on the basis of disability. The applicable law and regulations may be examined in the office of the ADA Compliance Coordinator, who has been designated to coordinate the efforts of the Institute to comply with Section 504 and ADA.

It is the responsibility of the student to seek available assistance at Penrose Academy and to request reasonable accommodations prior to the first day of the program.

Additionally, Penrose Academy is not obligated to provide accommodations that fundamentally alter any of the school's programs. In a case where the request is unreasonable, the coordinator will promptly search for an equally effective alternative for the student that would not alter the program fundamentally and offer this accommodation to the student.

ADA Compliance Coordinator:

Andria Young, Director of Student Services
13402 N. Scottsdale Road Suite B-160, Scottsdale, AZ 85254
480.222.9540 ext. 208
andria@penrose.edu

HANDICAPPED ACCESS

Penrose Academy is readily accessible with handicapped restroom facilities for disabled individuals. While the facility is handicap accessible and the academy adheres to the American with Disabilities Act, some of the Student Salon or Student Spa services may require the ability to climb on top of a spa bed/pedicure chair to receive or give that service. Also, our programs require manual dexterity which may not be suitable for all individuals.

PHYSICAL EXPECTATIONS

Each program consists of physical expectations of each student to successfully complete a program, including:

- Commitment to professional development for long term success.
- Time spent standing, bending and taking care of guests.
- Time spent interacting with diverse types of people.
- Repetitive motions for fingers, hands, arms, etc.
- Exposure to chemicals and lasers (lightener, perms, relaxers, chemical peels, acrylic monomers/polymers, lasers, etc.).
- Physical contact from educators and fellow classmates during demonstration.

REQUESTS FOR ACCOMMODATION

Individuals with disabilities wishing to request a reasonable accommodation must contact the ADA Compliance Coordinator. A disclosure of a disability or a request for an accommodation made to a faculty or staff member, other than the ADA Compliance Coordinator, will not be treated as a request for an accommodation. However, if a student discloses a disability to faculty or staff member, he or she is required to direct the student to the ADA Compliance Coordinator.

The ADA Compliance Coordinator will provide a student or applicant with a Request for Reasonable Accommodations form.

Reasonable accommodations are available for students and applicants who provide the appropriate documentation of a disability. Such documentation should specify that a student has a physical or mental impairment, how that impairment substantially limits one or more major life activities and how the disability affects the student's functions in a learning environment (academic*, attendance or both). In general, the supporting documentation must be dated less than three years from the date a student requests a reasonable accommodation (may be waived upon President's approval) and must be completed by a qualified professional in the area of the student's disability as enumerated in the following table:

Disability	Qualified Professional
Physical disability	MD, DO
Visual impairment	MD, Ophthalmologist, Optometrist
Mobility, orthopedic impairment	MD, DO
Hearing impairment	MD, Audiologist (Au.D) *audiology exam should not be more than a year old
Speech and language impairment	Licensed speech professional
Learning disability	PhD Psychologist, college learning disability specialist, other appropriate professional
Acquired brain impairment	MD Neurologist, Neuropsychologist
Psychological disability	Psychiatrist, PhD Psychologist, LMFT or LCSW
ADD/ADHD	Psychiatrist, PhD Psychologist, LMFT or LCSW
Other disabilities	MD who practices or specializes within the field of the disability

Documentation used to evaluate the need and reasonableness of potential accommodations may include a licensed professional's current medical diagnosis and date of diagnosis, evaluation of how the student's disability affects one or more of the major life activities and recommendations, psychological and/or emotion diagnostic tests, functional effects or limitations of the disability, and/or medications and recommendations to ameliorate the effects or limitations.

Penrose Academy may request additional documentation as needed and may, at its discretion, waive the requirement for medical documentation to support accommodation requests that relate to obvious impairments and/or are minimal in nature. Requested accommodations which compromise the essential elements of the course of study, may not be reasonable. Students must seek assistance prior to the start of the course of study. Prospective students who fail to seek reasonable accommodations at the beginning of the course of study may find that the scope of available accommodations becomes limited.

After the ADA Compliance Coordinator receives the Request Form and the required documentation, he/she will engage the student or applicant in an interactive process to determine what available accommodations may be reasonable.

If the student or applicant is denied the requested accommodation, he/she may file a grievance using the Grievance Process below or he/she may file a complaint with the U.S. Department of Education's Office for Civil Rights or a similar state entity.

Penrose Academy will make appropriate arrangements to ensure that disabled persons are provided other accommodations, if needed, to participate in this grievance process. The ADA Compliance Coordinator will be responsible for such arrangements.

*Students requiring academic accommodations may not exceed 100% in attendance. Individual accommodations will be provided by the Director of Education.

STUDENT APPEAL

If a student disagrees with any accommodation decision made by the ADA Compliance Coordinator, the student may appeal the accommodation decision.

GRIEVANCE PROCEDURE

Penrose Academy grievance procedure provides a prompt and equitable resolution of complaints alleging any action prohibited by Section 504 and/or the ADA.

Any person who believes she/he has been subjected to discrimination on the basis of disability, including disagreements regarding requested accommodations, may file a grievance pursuant to the procedure outlined below. The Institute will not retaliate against anyone who files a grievance in good faith or cooperates in the investigation of a grievance.

1. Grievances must be submitted to the ADA Compliance Coordinator. Grievances must be submitted to the ADA Compliance Coordinator, within 30 days of the date the person filing the grievance becomes aware of the alleged discriminatory action.
2. A complaint must be in writing, containing the name and address of the person filing it. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.
3. The ADA Compliance Coordinator shall investigate the complaint and afford all interested persons an opportunity to submit relevant evidence. The Complainant may also present witnesses relative to the complaint. The ADA Compliance Coordinator will maintain the files and records relating to such grievances.
4. All reasonable efforts will be made to provide a written determination to the student or applicant within 30 days after its filing. If a written determination cannot be made within 30 days of the complaint's filing, the ADA Compliance Coordinator will so advise the student and provide an update as to the status of the investigation. The student may also contact the ADA Compliance Coordinator to inquire as to the status of the investigation at reasonable intervals.
5. The person filing the grievance may appeal the decision of the ADA Compliance Coordinator to Penrose Academy's Director of Education within 15 days of receiving the ADA Compliance Coordinator's decision. The Academy Director of Education shall issue a written decision in response to the appeal no later than 30 days after its filing.

Missy Conti, Director of Education
13402 N. Scottsdale Road Suite B-160, Scottsdale, AZ 85254
480.222.9540 | missy@penrose.edu

6. The availability and use of this grievance procedure does not prevent a person from filing a complaint of discrimination based on disability with the U. S. Department of Education's Office for Civil Rights and/or a similar state agency.
7. Penrose Academy will take all steps to prevent recurrence of any proven harassment or other discrimination and to correct discriminatory effects where appropriate.

SECTION SIX: ACADEMIC PROGRAMS

COSMETOLOGY HYBRID PROGRAM OVERVIEW

The Cosmetology Hybrid Program requires 1500 completed hours. While completing these required hours students will participate in all school assemblies, distance education online assignments, theory classes and hands-on instruction. This program consists of six zones, each with a specific focus. For the first zone of this program students will be in a classroom environment practicing hands-on skills through workshops on mannequins, student peers and recruited models (refer to program syllabus for specific number of hours). After completing Zone 1 of the program and passing the required test out, students will advance to the Student Salon Floor to continue with the hands-on experience while practicing on the general public. A student will cover and build upon the following topics throughout the program:

Shampooing & Conditioning	Haircutting	Texture Services
Scalp Care	Hair Additions and Extensions	Product Knowledge
Massage Techniques	Braiding	Safety and Sanitation Practices
The Structure of Hair	Men's Grooming	Infection Control
Hair Diseases and Disorders	Hairstyling	Local Laws, Rules and Regulations
The Salon Business	Haircoloring	Skincare
Massage Techniques	Skin Diseases and Disorders	The Layers of the Skin
Facial Makeup	Hair Removal	Manicuring
The Structure of the Nail	Pedicuring	Nail Diseases and Disorders

HAIR HYBRID PROGRAM OVERVIEW

The Hair Hybrid Program requires 1000 completed hours. While completing these required hours students will participate in all school assemblies, theory classes and hands-on instruction. This program consists of four zones, each with a specific focus. For the first zone of this program students will be in a classroom environment practicing hands-on skills through workshops on mannequins, student peers and recruited models (refer to program syllabus for specific number of hours). After completing Zone 1 of the program and passing the required test out, students will advance to the Student Salon Floor to continue with the hands-on experience while practicing on the general public. A student will cover and build upon the following topics throughout the program:

Shampooing & Conditioning	Haircutting	Texture Services
Scalp Care	Hair Additions and Extensions	Product Knowledge
Massage Techniques	Braiding	Safety and Sanitation Practices
The Structure of Hair	Men's Grooming	Infection Control
Hair Diseases and Disorders	Hairstyling	Local Laws, Rules and Regulations
The Salon Business	Haircoloring	

ESTHETICS PROGRAM OVERVIEW

The Esthetics Program requires 600 completed hours. While completing these required hours students will participate in all school assemblies, theory classes and hands-on instruction. This program consists of four zones, each with a specific focus. For the first zone of this program students will be in a classroom environment practicing hands-on skills through workshops on mannequins, student peers and recruited models (refer to program syllabus for specific number of hours). After completing Zone 1 of the program and passing the required test out, students will advance to the Student Spa to continue with the hands-on experience while practicing on the general public. A student will cover and build upon the following topics throughout the program:

Facial Treatments	Eyelash Enhancements	Chemical Peels
Skin Care	Facial Hair Tinting	Microneedling
The Layers of the Skin	Exfoliation	Dermaplaning
The Spa Business	Safety and Sanitation Practices	Lash Services
Facial Makeup	Infection Control	Product Knowledge
Hair Removal	Local Laws, Rules & Regulations	Massage Techniques




LASER PROGRAM OVERVIEW

The Laser Program requires 88 completed hours and offers an additional 12 optional clinical hours. While completing these required hours students will participate in didactic classes and hands on instruction. This program consists of two zones, each with a specific focus. For the first zone of this program students will be in a classroom environment practicing hands-on skills through workshops on student peers and recruited models. After completing Zone A of the program, students will advance to the student MedSpa to continue with the hands-on experience while practicing on the general public. The curriculum includes:

Radio Frequency Treatments	Spider Vein Reduction	TriBella
Body Contouring	Scar Treatments	Medical Surveillance
Pigment Reduction	Skintag Removal	Laser Fundamentals
RF Microneedling	Safety, Sanitation & Infection Control	Non-Ablative Skin Resurfacing
Photofacial	Thermocoagulation Treatments	Non-Ablative Tattoo Reduction
Vascular Reduction	Skin Tightening	Medical Surveillance Practices
Milia Removal	Laser Hair Reduction	

SECTION SEVEN: STUDENT-RIGHT-TO-KNOW INFORMATION

Penrose Academy tracks and makes available annual performance with respect to student completion, licensure and placement rates as reported to the Integrated Postsecondary Education Data System (IPEDS) to any enrolled or prospective student. The requirement from our accrediting agency, COE, is 60% Completion, 70% Licensure and 70% Placement. The following table is provided as a reference to the reported rates*. For a more disaggregated breakdown of these rates visit the College Navigator link on the Penrose Academy website at www.penrose.edu.

COMPLETION RATE	LICENSURE RATE	PLACEMENT RATE
 94%	 85%	 88%

* The above rates are the average of all programs offered at Penrose Academy as reported to COE for the most recent annual report.

For the first zone of this program students will be in a classroom environment practicing hands-on skills through workshops on mannequins, student peers and recruited models (refer to program syllabus for specific number of hours). Penrose Academy does not guarantee employment upon graduation. However, Penrose Academy offers placement assistance through our Career Fairs, coaching with our Student Services Department and maintains a current list of job openings and opportunities for both enrolled students and graduates. This listing is located on the Penrose App under Jobs. Specific staff members are designated to serve on a Placement Team that visits local salons, spas, medspas, nail salons/spas and industry related businesses to build a rapport and familiarize them with our school and student body.

Penrose Academy graduates have multiple opportunities to be employed in the industry. Provided below are examples of some, yet not all, of these industry related employment opportunities, that have been obtained by previous graduates.

Hairstylist	Esthetician	Nail Technician
Color Specialist	Salon/Spa Owner	Salon/Spa Manager
Makeup Artist	Sales Representative	Sales Consultant
Medical Esthetician	Laser Technician	Freelance Artist
Manufacturer Representative	Stylist for film, theater, fashion or print	Platform Educator

PROGRAM CAREER/OCCUPATION INFORMATION

The U.S. Department of Education requires Penrose Academy to disclose Standard Occupation Codes (SOC) of each Program, as listed below. Also disclosed are the links to Career Occupational Guides as posted on the O-NET website for each program offered at Penrose Academy.

PROGRAM	STANDARD OCCUPATION CODE
Cosmetology Hybrid Major Group: 39-0000 Minor Group: 39-5000	SOC: 39-5012 Hairdressers, Hairstylists and Cosmetologists http://www.onetonline.org/link/summary/39-5012.00
Hair Hybrid Major Group: 39-0000 Minor Group: 39-5000	SOC: 39-5012 Hairdressers, Hairstylists and Cosmetologists http://www.onetonline.org/link/summary/39-5012.00
Esthetics Major Group: 39-5090	SOC: 39-5014 Skincare Specialists http://www.onetonline.org/link/summary/39-5094.00
Laser Major Group: 39-5090	SOC: 39-5014 Skincare Specialists

STUDENT RECORDS & RIGHT OF ACCESS AND PRIVACY

The Family Educational Rights and Privacy Act (FERPA) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education. Penrose Academy respects the privacy and security of Personally Identifiable Information (PII) and educational records. Penrose Academy does not publish private student information; however, Section 99.37 of FERPA permits Penrose Academy to disclose, upon request, directory information (student's name, address, telephone number, date and place of birth, field of study, dates of attendance) without the student's consent unless the student has otherwise directed Penrose Academy, in writing. The school provides and permits access to student and other school records as required by the AZBCB.

Student records are maintained for a minimum of three years. Student records/files are only available to restricted staff, COE and certain government agencies may gain access to all students' files at any time.

Collection and Use of Personal and Educational Records: Penrose Academy collects information from various sources including but not limited to a student's enrollment application and forms. We also obtain information due to transactions students have with us or that we have with third parties on a student's behalf. We use that information to provide students with products and/or services students have requested from us and to comply with reporting and/or other legal requirements or mandates.

Safeguarding Records: Penrose Academy keeps student educational and financial records in secure offices and in a manner so to maintain them safely (storage cabinets, fireproof file cabinets, etc.). Penrose Academy maintains physical, electronic and procedural safeguards that comply with the regulations and leading industry standards. A student's non-public personal information is restricted to staff/faculty members Penrose Academy has determined to have legitimate educational interests.

This includes contractors, consultants or other parties to which Penrose Academy has outsourced institutional services or functions.

Release of Information with Student Consent: Students (or parent/guardian of dependent minors) may authorize the release of information to outside/third parties if they wish. Requests must be made to the Student Services, Education, Financial Aid, Admissions or Compliance Departments in writing. This request must include the desired record, purpose of and party/class of parties to disclose the information to. Blanket releases are not permitted. Information will not be released without the student's (or parent/guardian of dependent minors) consent.

Release of Information without Student Consent: FERPA permits the disclosure of PII (Personally Identifiable Information) from students' education records, without consent of the student, if the disclosure meets certain conditions of the FERPA regulations. PII is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another can be considered PII. Except for disclosures to school officials, disclosures related to some judicial orders or lawfully issued subpoenas, disclosures of directory information and disclosures to the student, FERPA regulations requires Penrose Academy to record the disclosure. Eligible students have a right to inspect and review their record of disclosures. Penrose Academy may disclose PII from the education records without obtaining prior written consent of the student to:

- Accrediting bodies, the U.S. Department of Education, the Secretary of Education or State, the U.S. Attorney General and others, relating to our status as a candidate school for programs, in connection with an audit or evaluation of Federal or State supported education programs or for the enforcement of/compliance with Federal legal requirements related to those programs.
- Comply with a judicial order or lawfully issued subpoena.
- Appropriate officials in connection with a health or safety emergency.
- Parents of an eligible student if the student is a dependent for IRS tax purposes.
- A victim of an alleged perpetrator of a crime of violence or a non-forcible sex offense. The disclosure may only include the final results of the disciplinary proceeding with respect to that alleged crime or offense, regardless of the finding.
- The general public, as a final result of a disciplinary proceeding, if Penrose Academy determines the student is an alleged perpetrator of a crime of violence or non-forcible sex offense and the student has committed a violation of rules or policies with respect to the allegation made against him or her.
- Parents of a student under the age of 21, if Penrose Academy determines the student committed a disciplinary violation of any Federal, State or local law or of any rule or policy of Penrose Academy that governs the use or possession of alcohol or a controlled substance.
- Determine, if necessary, the eligibility, amount of aid or enforcement of the terms and conditions relating to financial aid a student has applied for or received.
- Organizations conducting studies for or on behalf of Penrose Academy to develop, validate or administer predictive tests, administer student aid programs or improve instruction.
- Accrediting organizations to carry out their accrediting functions.

Records will be released to such agencies to fulfill the duties, directives or orders of such or to assist Penrose Academy in fulfilling its missions and objectives and will be indicated on file if such a review has been performed.

Student Rights: Penrose Academy guarantees each student (or parent/guardian of dependent minors) the right to access their records and to consent to or withhold the disclosure of Personally Identifiable Information (PII). Penrose Academy does not currently produce a student directory; however, should a directory be published in the future students will have the right to withhold PII from it. Such a request should be made in writing to the Academy President.

Students have the right to inspect and review educational records. Requests must be made in writing and will be complied to within 45 days of the request. During a review of educational records, if an item(s) is found to be inaccurate, misleading, or otherwise in violation of a student's privacy rights under FERPA, a written request may be submitted, including any supporting documentation that proves the information is incorrect, to the President to amend the information. A written response explaining the outcome of the request will be provided.

If a student feel Penrose Academy has failed to comply with the requirements of FERPA, the student has the right to file a written complaint with the U.S. Department of Education concerning the alleged failures. Written complaints should be mailed to: Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202

HIPAA & FERPA: HIPAA (Health Insurance Portability and Accountability Act of 1996) is a United States legislation that provides data privacy and security provisions for safeguarding medical information. HIPAA applies to Health Care Providers, private benefit plans and health care clearinghouses. HIPAA does not apply to other types of organizations whose receipt or maintenance of health records is incidental to their normal course of business. FERPA provides safeguards of education records and does not limit what records a school may obtain, create or maintain.

Penrose Academy follows requirements for the privacy of health records (HIPAA). The Student Services and Education Departments maintain health records for students requesting services, waivers or accommodations. Receipt and maintenance of health records is well established. If a health record is used to make a decision in regard to a student's education program the health record may be construed to be an education record, in which case the normal FERPA provisions for safeguarding the record would apply.

Health and Safety Exemption Requirement: A health and safety exception permits the disclosure of PII from a student's record in case of an immediate threat to the health or safety of students or other individuals. Penrose Academy only discloses PII from an education record to appropriate parties in connection with an emergency *if* knowledge of the information is necessary to protect the health or safety of the student or other individuals.

SECTION EIGHT: EXPECTATIONS OF STUDENTS ON OUR CAMPUS

COMMUNITY INVOLVEMENT

Penrose Academy's exclusive charity of choice is Homeless Youth Connection. Throughout the year, Penrose Academy offers opportunities for students and staff to participate in charitable and community events that directly benefit the Homeless Youth Connection. Student involvement depends on GPA, attendance and general compliance with the student catalog/student enrollment agreement.

STUDENT GUIDELINES

Through meaningful educational experiences, Penrose Academy educates, empowers and connects our students to their professional goals. To achieve that goal, it is our responsibility to maintain an environment that is safe, relevant, educational and consistent with our mission.

In addition to this obligation, Penrose Academy feels that all members of this educational environment are set up for success through the ideas, policies and information contained in this Student Catalog. By reading and signing this catalog, both Penrose Academy and the student accept responsibility for each other within our community.

Penrose Academy has established these policies to ensure the safety and well-being of this community and to respond promptly and accurately to actions that are contrary to our purpose and mission. Penrose Academy's Student Catalog seeks in its disciplinary function to impart the purpose and mission of this community.

As stated in the Enrollment Agreement, students acknowledge and agree to be bound by the terms and conditions defined in this Student Catalog. A student failing to comply with the rules and regulations set forth in this Student Catalog may face termination prior to completion of the program. Should any of these guidelines not be adhered to, the student may not benefit from the program as intended. Proper student conduct is important for the culture of the school, as it is our desire to lead everyone toward success. Penrose Academy complies with all local, state and federal laws that apply.

When a student's conduct or behavior adversely impacts Penrose Academy's community, the educational programs are jeopardized, and all are at risk. Behavior that is in violation of local, state or federal law will not be tolerated. In these cases, Penrose Academy does not provide protection from prosecution by law enforcement agencies.

STUDENT CODE OF CONDUCT POLICY

This code of conduct is a guide for students on personal conduct that reflects Penrose Academy's mission and culture. The Code of Conduct policy is intended to support a professional, safe, and healthy learning environment that promotes the academic, social, and professional growth of all students. The Code of Conduct is meant to support the development of self-discipline in all students. Both positive and negative consequences of behavior are recognized as necessary to encourage appropriate behavior and discourage inappropriate behaviors that would interfere with the goals and missions of Penrose Academy.

While attending school during regular hours or during school-sponsored activities, students are expected to adhere to following standards:

- Practice professionalism.
- Be committed to their education.
- Connect and communicate authentically with the entire Penrose community.
- Be genuine, fair, kind, respectful, and honest to the entire Penrose community.
- Be accountable by taking responsibility with the intention to do well.
- Handle critical feedback with an open mind; avoid the urge to deny, deflect, or diffuse constructive feedback.
- Be available. Put technology away and connect face to face.
- Students' priority at school is to learn; avoid distractions that interfere with or are counter-intuitive to that mission.
- Be in the assigned place with appropriate materials, ready to perform at the designated time that class and/or student clinic begins.
- Always use school-appropriate language and behavior while maintaining friendly and courteous behavior.
- Follow individual educator instructions, class and student clinic rules, and expectations.
- Do not become a distraction for others. Instead, allow every other student to maximize their potential. Encourage your fellow students. Never tear them down.
- School attendance and participation in classroom and student clinics are critical to the educational process. Refusal to participate is defined as refusal to perform services, refusal to take a guest, and refusal to take a walk-in guest.
- School attendance is necessary for student success. Furthermore, it allows students to achieve the maximum possible benefits from their educational experience. All students are encouraged to be present and prompt. School attendance is the responsibility of students.
- Represent yourself in a manner that you will be proud of.

PROHIBITED CONDUCT

Penrose Academy will not tolerate prohibited conduct violations. Prohibited conduct violations will bring severe penalties, and the involvement of law enforcement, in some incidents. Also, be advised that carrying or using a firearm will have the swiftest and most severe penalties available to the academy.

- Students must obey federal, state, and local laws and the policies of Penrose Academy.
- Students are prohibited from making false statements and/or providing false information to Penrose Academy's personnel, including Title IX coordinators and investigators.
- Students shall not take pictures or videos of other students, guests, faculty, or staff without consent.

- Students are prohibited from bullying other students. If you see someone being bullied, intervene by telling them to stop or immediately report it to Academy personnel. Arizona defines bullying as any written, verbal, or physical act/electronic communication, including social media, intended to harm a student and will not be tolerated.
- Students are prohibited from possessing weapons or controlled dangerous substances on any school property or at any school function on or off school property.
- The obstruction of teaching; disrupting or obstructing teaching and learning is prohibited.

Disruptions are behaviors that continue after a warning and which a faculty member would view as being likely to interfere with the conduct of a class substantially or repeatedly.

Examples may include but are not limited to Unauthorized use of cell phones and electronic devices in the classroom and student clinics, persistent speaking without being recognized, talking with classmates while a faculty member or another student who has the floor) is talking, arriving late, leaving early, or leaving and returning to class while the course is in session without approval.

Penrose Academy has a zero-tolerance policy for drug and alcohol use. The manufacture, distribution, dispensing of, possession, use, sale, purchase, offer to buy/sell or use of alcohol, illegal drugs, or related paraphernalia and the illegal use of drugs (including the use of prescription drugs that cause impairment and medical marijuana) at Penrose Academy is prohibited.

Penrose Academy will not tolerate on any school property or at any school function on or off school property:

- | | | |
|----------------------|-------------------|-------------------------------------|
| ○ Tobacco | ○ Sexual violence | ○ Fraud |
| ○ E-cigarettes | ○ Intimidation | ○ Damage or destruction of property |
| ○ Illegal drugs | ○ Retaliation | ○ Dishonesty |
| ○ Substance abuse | ○ Violence | ○ Forgery |
| ○ Vaping | ○ Weapons | ○ Physical abuse |
| ○ Drug paraphernalia | ○ Stalking | ○ Verbal abuse |
| ○ Gambling | ○ Theft | ○ Disorderly conduct |
| ○ Sexual harassment | ○ Harassment | ○ Discrimination |
| ○ Sexual misconduct | ○ Arson | ○ Alcohol |

RIGHTS AND RESPONSIBILITIES

FACULTY AND STAFF

Penrose Academy employees strive to help each student realize their potential. Together we work to foster inquisitiveness, gain knowledge, and succeed.

To make this commitment, Penrose Academy employees shall:

- Always allow the student access to varying viewpoints.
- Consistently deliver the subject matter relevant to the student's progress.
- Always make a reasonable effort to protect the student from safety risks.
- Always attempt to eliminate exposure to embarrassment or disparagement.
- Always follow the "Praise Publicly, Coach Privately" rule.
- Always accept differing points of view and celebrate diversity by providing a safe environment regardless of a student's race, color, creed, gender, gender identification, national origin, marital status, political or religious beliefs, family, social or cultural background, or sexual orientation.
- Always require and expect a student's involvement in the learning process.
- To know and execute the academy's policies regarding the Student Code of Conduct.
- It is the responsibility of faculty to inform students of classroom and student clinic expectations and assessment guidelines.
- It is the responsibility of faculty to work within the academy in a setting of clear and structured guidelines of the due process concerning violations of the Student Code of Conduct.

STUDENT

- Students will respect the rights of others.
- Students are involved in the learning process.
- Students have access to varying viewpoints.
- Students have the right to express their opinions responsibly.
- Students have the right to take part in their education.
- Students have the right to be respected by their educators, support staff, and peers.
- Students are responsible for demonstrating respect for themselves through hygiene, dress, and behavior.
- It is the responsibility of students to familiarize themselves and comply with Penrose Academy's policies regarding the Student Code of Conduct.
- Students will be informed of any alleged violations and sanctions concerning violations of the Student Code of Conduct policy.
- Students have the right to due process concerning alleged violations of the Student Code of Conduct policy, including an appeal process.

CODE OF CONDUCT VIOLATION PENALTIES

Penalties shall be viewed as progressive to meet the severity and nature of any offense. The principal element of all sanctions is to create a positive learning experience for the students, highlight a sense of responsibility for one's actions, and prevent future behaviors that may escalate in severity.

- | | | |
|--------------------|-----------------------|-----------------------------|
| ○ Informal warning | ○ Early dismissal | ○ Suspension from school |
| ○ Formal warning | ○ Behavioral contract | ○ Termination of enrollment |

Suspension from school will include suspension of privileges for participation in all school activities during the suspension period.

RIGHT TO DUE PROCESS

A student charged with code of conduct violations must be informed of the nature of the charges in writing, be given copies of any documents related to the charges and be given the opportunity to refute them.

The Academy must not be subjective in its decisions to sanction students and must always provide the opportunity for students to appeal any disciplinary penalty. Appeal procedures and guidelines are provided to students when disciplinary decisions are made. Whenever possible, except for reasons related to the mental or physical safety or wellbeing of the student or others on the campus, a student's status will not be altered, including the right to attend classes, participate in school-related activities, or use Penrose Academy facilities pending disciplinary action.

DISCIPLINARY MEASURES

Disciplinary measures shall be viewed as progressive to meet the severity and nature of any offense. The foremost element of all discipline shall be to create a positive learning experience for the students, to highlight a sense of responsibility for one's actions and to prevent future behaviors that may escalate in severity.

Disciplinary sanctions shall include but not be limited to:

- Informal warning
- Early dismissal
- Suspension from school
- Formal warning
- Behavioral contract
- Termination of enrollment

Suspension from school will include suspension of privileges for participation in all school activities during the period of the suspension.

STUDENT COMPLAINT POLICY

It is the policy of Penrose Academy to maintain a harmonious school environment. Penrose Academy encourages students to express concerns about school related issues, including communication, interpersonal conflict, and other conditions.

Students are encouraged to raise concerns with their immediate Educator, Director of Education or Student Services Department. If not resolved at this level, a student may submit in writing a formal complaint.

All students and employees, regardless of their positions, are covered by and expected to comply with this policy and are to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any student or employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of enrollment/employment.

Penrose Academy assures that all students filing a complaint can do so without fear of retaliation or reprisal.

STUDENT COMPLAINT PROCEDURE

Penrose Academy has established the following procedure for filing a complaint and will treat all aspects of the procedure confidentially to the extent reasonably possible.

1. Students should complete a student complaint form. Student complaint forms are available to students via Penrose app, or a hard copy can be obtained in the Student Services office.
2. Complaints should be submitted as soon as possible after an incident has occurred, in writing to the Student Services department or to the Director of Education. If the complaint is on either the Student Services department or the Director of Education, submit the complaint in writing, to the President.
3. The complaint will be reviewed upon receipt.
4. An investigation will be launched to determine whether there is a reasonable basis for considering that the alleged violation of this policy occurred.
5. During the investigation, the complainant, the respondent and any witnesses will be interviewed to determine whether the alleged conduct occurred.
6. Upon conclusion of an investigation, the person conducting the investigation will submit a written report of his or her findings. If it is determined that a violation of this policy has occurred, appropriate disciplinary action will be recommended. The appropriate action will depend on the following factors:
 - a) the severity, frequency and prevalence of the conduct.
 - b) prior complaints made by the complainant;
 - c) prior complaints made against the respondent; and
 - d) the quality of the evidence (e.g., firsthand knowledge, credible corroboration).
7. If the investigation is inconclusive or if it is determined that there has been no violation of policy, but potentially problematic conduct may have occurred, appropriate preventive action may be taken.
8. Once a final decision is made, either the Director of Education or the Director of Student Services will meet with the complainant and the respondent separately and notify them of the findings of the investigation. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.

GRIEVANCE PROCEDURE FOR STUDENT COMPLAINTS

Any complaint not resolved at the level of filing a complaint, and student may submit, in writing, a signed grievance to the President. Complaints or grievances against the President shall be submitted to the Owner and CEO of Penrose Academy.

After receiving a written grievance, Penrose Academy may hold a meeting with the student, employee, the department head, and any other individuals who may assist in the investigation or resolution of the issue. All discussions related to the grievance will be limited to those involved with, and who can assist with, resolving the issue.

In the event that a grievance may not be resolved at the institutional level, a formal grievance may be filed with the Council on Occupational Education, Arizona Board of Barbering and Cosmetology.

Council on Occupational Education

7840 Roswell Rd. Bldg. 300 Ste. 325

Atlanta, GA 30350

(770) 396-3898

www.council.org

Arizona Board of Barbering and Cosmetology

1740 W. Adams St. Suite 4400

Phoenix, AZ 85007

(480) 784-4539

www.bcb.az.gov

RECORDKEEPING

Penrose Academy will maintain student complaint records for a period of six years.

SUBSTANCE ABUSE PREVENTION POLICY

Drug abuse can have a pervasive effect on an entire community. Understanding drug use risk factors and spreading the word through prevention programs is the best defense against drug abuse.

Drug abuse prevention has become an important first step in informing our Staff, Faculty and Students about the dangers of addiction, prevention techniques and where to find recovery help if necessary.

The use of drugs and alcohol can cause numerous health problems and can lead to death. The effects to a person's health include respiratory failure, heart attack, overdose, acute intoxication and transmittable diseases such as Hepatitis C and AIDS. Thousands of deaths are caused each year by drug overdoses, allergic reactions to drugs, toxic combinations of drugs and alcohol poisoning.

Some drugs legally purchased at a pharmacy, whether they're prescribed by a doctor or bought over-the-counter (OTC), can be just as dangerous and impair your judgement. Look for warning labels or ask your pharmacist if in doubt about a drug's capacity for impairment.

Penrose Academy has a zero-tolerance policy for drugs and alcohol use. For the safety of Penrose Academy, Students, Staff, Faculty and its guest's, the manufacture, distribution, dispense of, possession, use, sale, purchase, offer to buy/sell or use of alcohol, illegal drugs or related paraphernalia and the illegal use of drugs (including the misuse of prescription drugs) at Penrose Academy, on campus or while engaged in the course curriculum, is strictly prohibited.

Students, Staff or faculty under the influence of nonprescription or prescription drugs (those that impair judgment, alertness, concentration or motor skills), alcohol, or any unknown substance (including before school, during school, on a field trip or at a Penrose Academy event) will be asked to leave the premises immediately. An investigation and termination proceedings may follow and may be subject to criminal prosecution. Penrose Academy further reserves the right to take any and all appropriate and lawful action necessary to enforce this substance abuse policy including, but not limited to, the inspection of school issued lockers, desks or other suspected areas of concealment, as well as personal property when the school has reasonable suspicion to believe the student, staff or faculty member has violated this policy. The use of a drug detection dog may also be used for searches.

Penrose Academy also prohibits such conduct during non-curriculum time to the extent that, in the judgment of Penrose Academy, it impairs a student's ability to progress through the curriculum, threatens the reputation and/or integrity of the school or violates the law.

Penrose Academy will refer violators to the authorities for prosecution consistent with local, state and federal law in accordance the Arizona Revised Statutes Title 13 Criminal Code, Chapter 34 Drug Offenses, Sections 3401 – 3421 which can be found online at www.azleg.state.az.us.

The penalties for drug possession can vary and depend on the kind and quantity of drugs or substances in possession, previous criminal history, and whether your charges are simple possession, which is for personal use, or possession with the intent to sell. Students and staff members who use prescription drugs should follow the prescribing physician's directions for use. Prescriptions must be kept with the prescription bottle with the person's name and prescribed medication. Suppose the use of a prescription drug impairs performance or affects safety. In that case, you should notify your educator or immediate supervisor, so Penrose Academy can take appropriate action to protect your safety and the safety of fellow students, coworkers, and guests. Any student or staff member violating this policy is subject to suspension or expulsion from the program.

Any student who violates this policy is subject to expulsion from the program. In addition, any staff or faculty member who violates this policy is subject to sanctions leading up to or including termination.

Students may request a paper copy of Penrose Academy's Substance Abuse and Prevention Policy from the Student Services office for resources on substance abuse prevention; this policy is also provided digitally for every student and posted on our student app. This policy is also provided digitally for every student and posted on the Penrose App.

SAFETY SANITATION AND INFECTION CONTROL (SSIC)

Penrose Academy follows a Safety Sanitation and Infection Control (SSIC) Policy to educate and enforce protocols and plans that contribute to the safety, health and welfare of the Penrose community. This policy focuses on educating students about diseases, infections and threats in the salon such as MRSA, Hepatitis B and C, HIV, AIDS, COVID-19, etc.

Additionally, the policy educates students, staff and faculty on how to prevent the spread of disease, ensure proper hygiene and follow safety and sanitation regulations while servicing the public in addition to the education covered in the daily curriculum.

The SSIC Policy is reviewed and revisited annually, more often when new threats arrive, so that students are aware and able to execute these practices on a daily basis and upon graduation.

Penrose Academy also may develop SSIC Policies that are specific to current pandemics and other threats. These policies are updated and posted to the Penrose App immediately following each update.

ACADEMIC TRANSCRIPTS

Academic transcripts are issued, both official and unofficial, by the Student Services Department. Each student will be provided one official transcript free of charge at time of graduation or withdrawal/termination if paid in full, with no outstanding issues and if requested. Additional copies must be requested in writing to the Student Services Department and will be issued at a cost of \$10. Transcripts will not be issued or released to any student retaining a balance due to Penrose Academy.

ATTENDANCE

Being prompt and on time is critical to a successful career. As a result, Penrose Academy has a very high attendance standard, similar to those of nearly all industry employers including the self-employed. Students must attend a minimum of 95% of the scheduled hours within time allowed to maintain Satisfactory Academic Progress, unless the President has approved documented absences. All absences are recorded and made a part of the student's permanent record. Attendance is monitored daily and reviewed monthly. The student is responsible for class material and/or tests missed while absent. Any student with an attendance percentage below 95% may be coached by an educator and/or Student Services staff member on how to improve attendance to meet SAP. That student may be placed on a Corrective Action Plan (CAP) with specific actions and deadlines to show timely progression toward completion of the program.

If a student needs to have a period of time to be absent, he or she needs to request that time off through Student Services. All time off must be made up prior to the student's contract date or Over Contract fees will incur. Opportunities for making up hours are limited; therefore, postponing travel and absences is highly recommended. Perfect attendance is highly encouraged.

If a student cannot attend class, they must call the school, email Student Services or utilize the Penrose App to communicate prior to the scheduled start time. Students must state their name, zone and reason for missing class when reporting absences. Students are expected to return to school the following day or must communicate as stated above for each day of absence.

If a student is absent or late without having received prior approval, did not communicate with the school or did not leave a message, it will be counted as a catalog violation. All hours missed will count towards the 5% that a student is afforded to miss and still maintain a satisfactory attendance percentage. Please note that any hours missed should be made up if such opportunities become available, to avoid over contract charges as detailed below.

CLOCKING IN AND OUT

Students must clock in on or before the scheduled start time of class each day by using Penrose Academy's time clock system. All students must clock in first thing in the morning, clock out/in for non-scheduled breaks and clock out at the end of each school day. Any student found to be "stealing" time, may be suspended or terminated as determined by the President.

ZONE 1 ATTENDANCE POLICY

Esthetics students missing more than 30 cumulative hours and/or three consecutive school days in Zone 1 may be required to perform a test-out to ensure technical progress and must pass with an 80% or higher. Cosmetology Hybrid and Hair Hybrid Students missing more than 35 cumulative hours and/or four consecutive school days in Zone 1 may be required to perform a test-out to ensure technical progress and must pass with an 80% or higher. Upon completion of the test-out, if necessary, a mandatory Leave of Absence may be required to repeat Zone 1. If so, the student will be allowed to re-enter at a specified date as determined by the President, Student Services and Admissions Departments, should space be available in the subsequent program/start-dates. Any student in Zone 1 placed on a mandatory Leave of Absence for attendance issues may be subject to re-enrollment fees as listed in this catalog as well as any over contract charges at the end of the student's revised contract date if applicable.

LEAVE OF ABSENCE (LOA)

Penrose Academy does not grant students the decision to take a Leave of Absence arbitrarily. In the case of an extreme personal hardship or medical crisis with documentation provided by a medical professional, stating that attendance would be unrealistic or impossible, or for a student serving in the military that has been called into active duty, a consideration may be made by the President. If the student does not return or contact the school on or before the scheduled return date, this will result in self-termination and Penrose Academy will document this as a withdrawal dated with the start date of the LOA.

Financial aid and any additional charges are suspended when a student is on an approved leave of absence. Students receiving Federal Financial Aid will not have any funds disbursed while on a Leave of Absence (LOA). Failure to return from an LOA will result in termination of the student's enrollment dated for the date of determination, however the student's last day of attendance (LDA) will be used for the Return to Title IV Calculation. Any refunds due will be made to the appropriate Title IV programs within 45 days of the date the student was scheduled to return. The student's subsequent failure to return from an LOA will immediately reduce the previous original grace period. All student's participating in Federal Direct Loans are responsible for the terms and agreements inherent in the Master Promissory Note.

ZONE EDUCATION

Cosmetology Hybrid, Hair Hybrid, Esthetics, and Laser programs are all organized into zones. The table below displays the number of zones by program and schedule. Once a student has successfully completed the appropriate number of hours and satisfied the requirements for all exams (both written and practical), the student will move onto the next zone which has a unique theory and clinic schedule to that zone.

PROGRAM AND SCHEDULE	NUMBER OF ZONES					
	1	2	3	4	5	6
Cosmetology Hybrid	✓	✓	✓	✓	✓	✓
Esthetics	✓	✓	✓	✓		
Esthetics 2-Day Esthetics Nights	✓	✓	✓			
Hair Hybrid (four-day schedule)	✓	✓	✓	✓		
Hair Hybrid (two-day schedule)	✓	✓	✓	✓	✓	
Laser (all Schedules)	✓	✓				

FACULTY CHOICE

Penrose Academy faculty members have the right to maintain customized classroom policies that align with their teaching style. The Director of Education will approve these faculty specific policies and those policies must be in conjunction with school wide policies and must be posted or explained at the beginning of each new academic zone.

PERSONAL APPEARANCE

The standards of personal appearance at Penrose Academy strive to maintain a professional and practical learning environment. They seek to recognize, balance, and respect an individual's need for self-expression and comfort during the school day with acknowledgment that Penrose Academy is an educational institution preparing students for a career in the professional beauty industry.

GENERAL PERSONAL APPEARANCE FOR ALL PROGRAMS

Generally, students have an obligation to dispense beauty advice and must maintain a clean and neat appearance. Refrain from wearing stained, dirty, wrinkled, frayed, overly revealing, or excessively oversized clothing to school. Clothing free of messages that promote tobacco, alcohol or drug use, or messages that are demeaning to any group of people. For safety reasons, slippers and flip flops may not be worn as shoes.

ESTHETICS AND LASER PROGRAMS

To respect the medical environment and maintain the highest level of professionalism, infection control and safety. Students wear:

- Closed toed shoes.
- Medical scrubs of any solid color.
- Hair secured off face during hands-on treatments.
- Nails that are groomed, neat, and shorter in length.
- Scrubs can be worn with undershirts of any color or pattern.
- Eyelashes free of extension/false lashes during the skin care portion of the curriculum.
- Penrose Academy and/or any Industry related t-shirt can be worn with scrub bottoms.

COSMETOLOGY HYBRID AND HAIR HYBRID PROGRAMS

The students in the Cosmetology and Hair Hybrid programs are empowered to be responsible, trustworthy students who can express themselves freely. Students wear:

- Shoes.
- Shirts with sleeves.
- Clothing of any color or pattern.
- Nails that are groomed and neat.
- Clothing tops overlapping bottoms.
- Undergarments covered by clothing.
- Shorts, skirts, and dresses that extend beyond the mid- thigh.
- Eyelashes free of extensions/false lashes during the skin care portion of the curriculum.
- Opaque (non-transparent) clothing covering skin on the stomach, waist, chest and back.

STUDENT ADVICE/COACHING

Penrose Academy team members are available for discussion and to advise students. When a student actively pursues advice from a staff member at Penrose Academy regarding personal issues, a recommendation will be offered to seek a licensed counselor. A list of counselors and resources will be provided to the student to seek out the professional of choice. Where possible, the school will cooperate with students about issues that relate to success in the program. Penrose Academy does not provide psychological assessment or counseling to students in any manner or capacity.

TECHNOLOGY POLICY

The use of technology is an integral part of Penrose Academy. Penrose Academy utilizes technology in the classroom and on the student salon/spa. An orientation to technology used is provided during the initial orientation and technical support is provided throughout the entire program by Student Services/ Faculty.

Technology should be used with appropriate discretion due to the possibility of posts becoming public without an individual's consent. It is advised that for both personal and professional reasons, students revise privacy settings on all social media accounts. Penrose Academy reserves the right to monitor and intervene in any internet activity that may affect the safety or well-being of students, staff and the community. All students are held accountable by Penrose Academy for online behavior, on or off campus and must adhere to the Student Conduct policy as mentioned in this catalog. Any violations of the following policies are grounds for disciplinary actions, up to and including termination.

- Cell Phones: All calls should be completed prior to class or during breaks. Cell phones are allowed in classroom/spa/clinic with permission of the educator. Personal phone calls will not be taken at the reception desk or in any office except in an emergency.
- Audio/Video Recording: Videotaping and audio recordings are not allowed at any time, unless with approval from the President and/or Marketing Manager. Photography of another student and/or guests may occur only with the permission of students and/or guests.
- Social Media: Defined as all forms of online publishing, group chat and discussion, including but not limited to Pinterest, Snapchat, Twitter, YouTube, Facebook, Instagram and blogs. Students are personally responsible for all content that is published on social networking sites. As stated in our Student Conduct Policy, Penrose Academy does not allow cyber bullying, engaging in unprofessional conduct, personal insults, obscenity, ethnic slurs, discrimination, intimidation or any other unacceptable behavior. Penrose Academy reserves the right to take any necessary disciplinary action deemed appropriate by the President.
- Communication with Employees: Students will not use social media as a form of communication with employees until after successfully completing the program. If a student needs to reach an employee, communication must be done through school-approved methods such as email, phone or the Penrose App.

DISCIPLINARY ACTION

Penrose Academy takes pride in its high standards to prepare students for the best salons, spas and medspas. If students choose to be insubordinate to our policies or standards, the following process is used to lead students back to successful behavior.

STUDENT CATALOG VIOLATIONS

A student's willingness to learn sets the foundation for education. Student Catalog Policy Violations are instances where a student's behavior is not consistent with the Penrose Academy Catalog. Below is the process by which such standard violations are handled:

- Student may receive a verbal warning or redirection by a Penrose Academy employee.
- Student may be suspended for a period of time.
- Student may be scheduled for a meeting with any department head or President for further action.
- Student may be terminated.

If a student is terminated for a Student Catalog Policy Violation, Penrose Academy's Refund / Amount Due Policy will remain in effect. The student will remain obligated for all amounts due under the Enrollment Agreement and this Student Catalog.

The student will not be permitted to enter Penrose Academy premises. Upon termination, the student will be responsible for immediately returning all materials, publications and equipment advanced by Penrose Academy. The student will not be entitled to graduate.

If a student is terminated under this provision, the student may file an appeal for reinstatement with the Board of Grievances as defined in this Student Catalog.

If a student is terminated for gross misconduct, which refers to deliberately or willfully disregarding the standards of behavior expected and/or displays a behavior serious enough and possibly criminal, such as stealing, threats, cheating, attending school under the influence of alcohol or illegal drugs, insubordination or bullying, the termination is determined as final, and an appeal will not be permitted.

APPEAL PROCESS

Students that have been terminated due to a student catalog violation, may follow an appeal process for reinstatement to be reconsidered for re-enrollment and be placed on "Probation".

- A. Student must submit a written appeal of termination to the President, Sr. Director of Admissions & Financial Aid or Student Services Department during regular business hours, and within 3 business days of student receiving a written determination of termination. Appeal must contain the following:
 - Why the student violated the Student Code of Conduct Policy.
 - What has changed that will allow the student to adhere to the Student Code of Conduct Policy.
- B. Appeal will be reviewed by a "Board of Grievances" as appointed by the President and made up of staff members. The written appeal will be reviewed (and the board may request an in-person interview with the student) and a determination made and provided to the student in writing within 10 business days with one of the following determinations:
 1. If a student appeals and the termination appeal is granted, the student will be placed on "Probation" and provided a CAP (Corrective Action Plan). A student's CAP will provide a detailed plan for each student to follow for successful adherence to the Student Code of Conduct Policy throughout the duration of their program, and student will be notified.
 2. If a student's appeal is denied, the termination is determined as final, attendance status will not be reinstated, and student will be notified.

SECURITY CAMERAS

There are security cameras located throughout Penrose Academy for the safety of our students, staff, faculty and guests.

USE OF PHOTOGRAPHY AND VIDEOGRAPHY

Students at Penrose Academy give permission for Penrose Academy to use any student photos, pictures or renderings in all forms of advertising, pamphlets, brochures and catalogs for the benefit of Penrose Academy. They release Penrose Academy of all claims made, regarding the use of photos for the benefit of Penrose Academy. This release shall remain in effect even after graduation from Penrose Academy. Pictures or videos of Penrose Academy may not be taken without the consent of the Penrose Academy President.

VISITORS

Students may not receive visitors during school hours unless approved by President under special circumstances. This policy includes the student breakroom, student patio and parking lot during breaks and lunch.

WORK BASED ACTIVITIES

Students are graded on services provided in the student salon/spa by tracking them on a work-based activity log. The logs are provided at the start of every zone (except zone 1) and require a predetermined number of services, both technical and business, to complete based on a standard technical ability which increases as a student progresses throughout the program. Log are turned in and graded on the last day of every zone. Failure to turn in log will result in a recorded zero for the grade(s) and is counted towards the student's GPA.

PARKING

Penrose Academy provides a limited number of student parking spaces. Carpooling is highly encouraged. Student parking is allowed in both in the front parking lot and the back parking lot behind the building. Students must enter through the front parking lot to access the back lot parking area. Penrose Academy will notify students via the Penrose App with any parking updates or changes as dictated by the property manager/landlord. Students should drive no more than 5mph. Any collisions or fender benders must be handled independently by students' individual insurance companies.

CAMPUS SEARCHES

To protect the safety and well-being of our students, campus searches may occur at any time and without notice. Searches may include student issued lockers, book bags or personal belongings in the case of suspected theft or wrongdoing. The use of a drug detection dog may also be used for searches. Those suspected of criminal activity will be referred to authorities.

LOCKERS

Penrose Academy issues all students a locker on their first day during Orientation. Each student will be assigned a locker number and a combination lock will be provided. The provided lock is the only lock permitted for use on Penrose Academy student lockers. No personal locks are allowed unless approved by the Student Services department. Assigned lockers and locks may not be traded or changed. Penrose Academy will remove any locks that are not provided through our Student Services department. Items left more than one week past a student's last day attended will be forfeited.

UNLICENSED PRACTICE

Students are not to provide services at home or outside the school. Solicitation of Penrose Academy's guests to be serviced outside of Penrose Academy is against AZBCB regulations and grounds for termination. In addition, all students should become familiar with the AZBCB and ADHS rules on unlicensed work; as if at any time an unlicensed individual is suspected of performing services, they may be prohibited from becoming licensed or certified in the state of Arizona by the AZBCB or the ADHS, Bureau of Radiation Control.

STATE BOARD REFRESHER CLASSES

One state board refresher class will be provided at no charge to students who have a student account documented as paid in full. Costs for additional refresher classes will be discussed at the time of request.

GRATUITIES

Penrose Academy is a no-tipping facility. Students are instructed to decline any tips or gratuities offered; however, guests are encouraged to re-book services in lieu of tipping as the best tip is more education and building students' appointment books. Students acknowledge at enrollment the no tipping environment and students accepting tips are subject to disciplinary action up to and including termination.

PRODUCT PURCHASES

Product discounts are available for currently attending students on select retail products only. However, to accommodate the requests, as a special earned privilege, students are eligible to purchase retail products for a 10% discount during Penrose Academy's regular business hours. Professional products/back bar are not included. On occasion, limited-quantity retail items and new items may only be sold to students at full retail price.

EXTRACURRICULAR ACTIVITIES

Students involved in extracurricular clubs or projects (Student Council, clubs, Wander & Wonder, etc.) will be allowed to arrive early, stay late and attend school on unscheduled days receiving hours for their enrolled program. These unscheduled opportunities are always pre-approved and under the supervision of licensed instructors.

STUDENT/STAFF RELATIONS

Penrose Academy prides itself on having a campus environment that is fair, based on trust and without favoritism. To ensure that culture exists, faculty and staff have chosen to maintain a strict non-fraternization policy amongst students and all Penrose Academy staff. Fraternalizing of any kind outside of a school approved activity or Study Abroad program where the President

has given approval and/or is present, is not allowed while a student is enrolled in a program. Students and Faculty/Staff will refrain from interacting/following each other on social media while enrolled in their prospective program; refer to the technology policy section for more information. Communication between all students and staff/faculty is to remain within the realms of a student-staff relationship, until such time that a student has officially graduated.

CONSUMER DISCLOSURES

As of October 1, 2021, Penrose Academy has had zero incidences of drugs and alcohol on campus.

Consumer Disclosure information is posted on the Penrose Academy website at www.penrose.edu and can be obtained during regular business hours from the Financial Aid or Student Services Departments. All students should review these disclosures prior to enrollment which include Financial Aid disclosures, Drug & Alcohol Prevention Policy and more. Also, for more information about our graduation rates, the median debt of students who completed the program and other important information, please visit www.penrose.edu for Program Gainful Employment Disclosures.

Penrose Academy adheres to the specifications of Title IX wherein no person in the United States shall, on the basis of gender, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance. The Title IX Coordinator for Penrose Academy is the President.



SECTION NINE: CAMPUS SAFETY SECURITY POLICY

Penrose Academy prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Students, parents and staff may access this report in full by contacting the Phoenix Police Department. A complete copy of this report is also available online at penrose.edu.

Campus crime, arrest and referral statistics include those reported to the Phoenix Police Department and the Penrose Academy designated campus officials.

Please note that Penrose Academy has only one campus, located at 13402 N. Scottsdale Road, Suite B160, Scottsdale, AZ 85254, with no campus housing nor satellite locations. Penrose Academy does not have a campus police staff, nor do the campus security officials have any arresting authority. Local law enforcement has the arresting authority on Penrose Academy Campus. Upon written request, Penrose Academy will disclose to the alleged victim of any crime of violence or non-forcible sex offense, the results of any disciplinary hearing conducted by Penrose Academy against a student who is the alleged perpetrator of such crime or offense.

Each year, by October 1, Penrose Academy will compile an annual security report that includes crime statistics from the incident and crime reports given to the campus security authorities. The crime statistics will be sent to the U.S. Department of Education each year upon receipt of the email requesting the crime reports. This information will be uploaded via <http://surveys.ope.ed.gov/security> by the President. Crime statistics from the area surrounding Penrose Academy will also be requested from the Phoenix Police Department and will be disclosed in the Annual Safety and Security Report (ASSR). Each year, a message will be sent to all students (current and prospective) and staff via the Penrose App by October 1, giving the website address to access this updated report. New staff members will receive a copy of policy during the New Hire Orientation.

SAFETY AND SECURITY REPORTING

The "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act" is a federal law that requires institutions of higher education in the United States to disclose campus security information including crime statistics for the campus and surrounding areas. For more information contact either the Campus Security Advisor, Nikki Parcels at (480)222.9540 or the Office of Civil Rights. Toll Free: (800)368.1019 HHS.gov.

EMERGENCY PROCEDURES

In the event of emergency, fire, inclement weather, evacuation or shelter in place, students and employees are alerted by verbal announcement from Penrose Leadership Team and/or educator. Additionally, if students maintain their Penrose App notifications, they will receive a second alert to each of their smart devices via the Penrose App.

REGISTERED SEX OFFENDERS

Arizona requires offenders to register with their local Sheriff's Department based on their Arizona Risk Assessment score. Information can be found on the website www.azsexoffender.com. Various free of charge search results can be obtained using information such as violator last name, the zip code for area of interest and a specific address with results for the surrounding three-square miles. A downloadable listing of sex offender information can be obtained for a fee. Arizona currently does not have any law against offenders seeking or obtaining employment or living near any educational institution.

HATE CRIMES

Penrose Academy does not condone violence or hate crimes of any kind. Penrose Academy strives to safeguard the rights of American citizens that are mandated by the Constitution of the United States, regardless of ethnicity, national origin, religion, gender, sexual identity, disability and political or religious beliefs.

SECURITY TIPS AND PERSONAL SAFETY

Prevention is the best protection against crime. Don't dismiss suspicious people or situations.

INFORMATION ON RISK REDUCTION

At the individual level, there are practical methods and strategies for reducing risk of sexual misconduct, but it is important to know that no method or strategy would be able to eliminate the risk of sexual misconduct completely, and that it is never your fault if you are harmed by sexual misconduct.

STALKING

Below are some practical methods and strategies for reducing risk of stalking, but it is important to know that no method or strategy would be able to eliminate the risk of stalking completely, and that it is never your fault if you are stalked.

- Trust your instincts. If something doesn't feel right, tell someone (preferably Title IX Coordinator and/or law enforcement).
- Don't post; or remove any posting of personal contact information on social media and other websites.
- Don't give your passwords or log in information to anyone including your significant other.
- If someone tells you they don't want to communicate with you, or if they stop responding, take the hint and stop contacting them.
- Change your routes and routines.

SEXUAL ASSAULT

Below are some practical methods and strategies for reducing risk of sexual assault, but it is important to know that no method or strategy would be able to eliminate the risk of sexual assault completely, and that it is never your fault if you are sexually assaulted.

- Always monitor your drink, and don't accept drinks from anyone you don't know or trust.
- Trust your gut. Do not hesitate to leave or ask for help if something doesn't feel right.
- Make a pact with your friends to watch out for one another and make sure everyone gets home safely.
- Be an active bystander.

UNDERSTANDING AND OBTAINING CONSENT

Understand that mixing alcohol or drugs with sexual activity is always risky. Do not engage in sexual activity if either or both parties are intoxicated.

- Talk to your partner about your needs, limits and boundaries.
- Listen and watch for signs that your partner is not consenting. Remember you are looking for an enthusiastic yes!
- If your partner gives anything less than an enthusiastic yes, stop what you are doing and ask your partner if they're ok and if they want to continue.
- Listen and watch for signs that your partner is not consenting.

SEXUAL HARASSMENT

Below are some practical methods and strategies for reducing risk of sexual harassment, but it is important to know that no method or strategy would be able to eliminate the risk of sexual harassment completely, and that it is never your fault if you are sexually harassed.

- Don't continue to ask someone out if they have already declined.
- Don't touch someone without their permission.
- Respect a person's wishes related to contact with them.
- Say "that wasn't funny" if you hear someone telling an offensive joke.
- Tell someone if you see or hear of someone exhibiting behavior that is making you uncomfortable.
- Take a minute to consider the implication of comments, jokes, or stories before sharing them with others.
- Don't post sexually explicit material on social media or in public spaces.
- Don't send or post pictures of yours or other's genitalia.

BYSTANDER INTERVENTION

Effective bystander programs foster an encouraging environment for others to speak out against sexist attitudes, rape myth beliefs, and sexual violence itself. Confronting sexual violence can help change the social norms of a community and society as a whole. The most commonly used bystander intervention model outlines the following five steps:

1. Recognize signs that an act of sexual violence may occur or is occurring.
2. Identify that the potential victim is at risk and that intervention is appropriate.
3. Decide whether or not to take responsibility to intervene.
4. Decide the most appropriate and safest way to intervene.
5. Implement the decision to intervene safely to diffuse the situation.

NON-DISCRIMINATION STATEMENT

The school in its admission, instruction and graduation policies does not discriminate based on age, sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability. Penrose Academy has designated Nikki Parcels, the President as the Compliance Coordinator, to ensure the school's compliance. If a student believes that Penrose Academy has failed to provide these services or if a student believes they have been discriminated against on the basis age, sex, race, ethnic origin, color, religion, financial status, country or area of origin or residence, sexual orientation or on the basis of disability, a student can file a grievance with the Compliance Coordinator, Penrose Academy President or the Office of Civil Rights at HHS.gov, by email: OCRComplaint@hhs.gov or Toll Free at (800)368.1019.

TITLE VI CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 is a federal law that prohibits discrimination on the basis of race, color or national origin in any program and activity that receives federal funding or other federal financial assistance.

Title VI States that: No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial Assistance.

The policy of Penrose Academy is to comply with Title VI of the Civil Rights Act of 1964 and its regulations that prohibit unlawful discrimination based on race, color, sex, age, disability and national origin.

The Title VI Compliance Officer is the President at Penrose Academy, who has been appointed to coordinate the efforts to comply with the law.

Any person who believes that he or she has been subjected to discrimination or retaliation based on their race, color, sex, age, disability or national origin may file a Title VI complaint.

Complaints may be filed directly with the Director of Education. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

TITLE VI COMPLAINT PROCEDURE

Notify the President as soon as possible after the incident.

Nikki Parcels, President
13402 North Scottsdale Road, Suite B-160
Scottsdale, AZ 85254
480.222.9450 Ext 202
compliance@penrose.edu

Grievance procedures to address complaints of discrimination based on race, color, sex, age, disability and national origin are set forth in the student grievance procedure published in the student catalog.

TITLE IX

Title IX of the Education Amendments Act of 1972 is a federal law that states: "No person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

Penrose Academy adheres to the specifications of Title IX. The Title IX Coordinator for Penrose Academy is the President. The Title IX Deputy is Missy Conti, Assistant Director of Education.

VAWA

Congress passed the Violence Against Women Act of 1994 (VAWA 1994) as part of the Violent Crime Control and Law Enforcement Act of 1994 In recognition of the severity of the crimes associated with domestic violence, sexual assault and stalking.

TITLE IX SEXUAL HARASSMENT, DISCRIMINATION, AND MISCONDUCT POLICY

Penrose Academy does not tolerate sexual Misconduct, including sexual harassment. Such conduct harms the well-being of our community members, our learning environments, working environments, and the collegial relationships among students, faculty, and staff that characterize the culture of Penrose Academy. Therefore, all prohibited conduct under this policy is regarded as severe academy offenses, and violations may result in discipline, including the possibility of separation from the Academy.

Penrose Academy does not discriminate based on sex in its education programs or activities. Title IX requires Penrose Academy of the Education Amendments of 1972 (Title IX) and 34 C.F.R. Part 106 not to discriminate in such a manner. The requirement not to discriminate in the education program or activity extends to admissions and employment. Inquiries about the application of Title IX and 34 C.F.R. Part 106 may be referred to Penrose Academy's Title IX coordinators, the United States Department of Education, Office for Civil Rights, Assistant Secretary for Civil Rights, or both.

Further, Penrose Academy is committed to providing safe and non-discriminatory learning and working environments for all members of the Academy's community. Therefore, Penrose Academy does not discriminate based on sex or gender in any of its education or employment programs or activities as outlined in the policy 'Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence. This policy prohibits behavior that violates Title IX, VAWA, Title VII, and Clery Act, and Penrose Academy's Code of Conduct.

Penrose Academy adopts this policy with a commitment to eliminating, preventing, and addressing the effects of prohibited conduct and fostering a community of trust and mutual respect in which prohibited conduct is not tolerated.

Penrose Academy strives to cultivate a climate where all individuals are well-informed and supported in reporting prohibited conduct, providing a fair and impartial process for all parties.

TITLE IX DESCRIPTION

Title IX of the Education Amendments Act of 1972 is a federal law that states: "No person in the United States shall, based on sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving federal financial assistance.

Penrose Academy adheres to the specifications of Title IX.

CLERY ACT

The Clery Act or The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 USC § 1092(f)) is the federal law that requires colleges and universities across the United States to disclose information about crime on and around their campuses. Penrose Academy discloses and publishes an Annual Safety and Security Report to current and prospective students and employees by October 1 of each year. This report provides crime statistics for the prior three years, policy statements regarding various safety and security measures, campus crime prevention descriptions, emergency notifications, missing students, and prevention and procedures to be followed in the investigation and prosecution of alleged sex offenses. In addition, under the Clery Act, any student or employee who becomes a victim of dating violence, domestic violence, sexual assault, and stalking (on or off campus) has the right to receive a written explanation of their rights and options.

VAWA

Congress passed the Violence Against Women Act (VAWA) as part of the Violent Crime Control and Law Enforcement Act of 1994 In recognition of the severity of the crimes associated with domestic violence, sexual assault, and stalking.

TITLE IX COORDINATOR

Penrose Academy Title IX coordinators, Missy Conti, Stephanie Toth, and Andria Young are an integral role in ensuring that all students have access to the variety of resources that Penrose Academy offers.

Responsibilities of the Title IX Coordinator:

- Oversee the academy's compliance with Title IX.
- Respond to any report of sexual harassment or violations of Title IX and the code of conduct against any employee or student at Penrose Academy.
- Oversee and participate in the resolving any formal complaint of sexual harassment or any other violations of Title IX and the Code of Conduct.

Contact Information:

Missy Conti
Title IX Coordinator
13402 N Scottsdale Rd. Suite B-160
Scottsdale, AZ 85254
(480) 222-9540 ext. 204
compliance@penrose.edu

Andria Young
Deputy Title IX Coordinator
13402 N Scottsdale Rd. Suite B-160
Scottsdale, AZ 85254
(480) 222-9540 ext. 208
compliance@penrose.edu

Steffi Toth
Deputy Title IX Coordinator
13402 N Scottsdale Rd. Suite B-160
Scottsdale, AZ 85254
(480) 222-9540 ext. 204
compliance@penrose.edu

TITLE IX COORDINATOR TRAINING

Penrose Academy's Title IX coordinator and Deputy Title IX coordinators, investigators, and other identified administration members have undergone extensive training in the Title IX policies and regulations through Thompson Coburn Title IX a module-based training series.

- Module 1 – An Introduction to Managing Title IX Sexual Harassment on Campus: [Module 1 - Fundamentals of the Law](#)
- Module 2 – Formal Complaints of Title IX Sexual Harassment: [Module 2 - Formal Complaints](#)
- Module 3 – Title IX Investigations & Informal Resolutions: [Module 3 - Investigations & Informal Resolutions](#)
- Module 4 – Title IX Hearings: [Module 4 - Hearings](#)
- Module 5 – Title IX Determinations: [Module 5 - Determinations](#)
- Module 6 – Title IX Appeals: [Module 6 - Appeals](#)

Title IX coordinators, investigators, decision-makers, and anyone who facilitates an informal resolution process under these procedures, also receive training on prohibited conduct not constituting sexual harassment as defined in this policy and on the policy and procedures contained herein. All materials used to train Title IX coordinators, investigators, decision-makers, and any person that facilitates an informal resolution process under these procedures, do not rely on sex stereotypes and promote impartial investigations and adjudications of formal complaints of prohibited conduct. Training is provided annually to Title IX coordinators, investigators, decision-makers, and anyone who facilitates an informal resolution process.

STUDENT AND EMPLOYEE PREVENTION

Students and employees are required to take the 'Title IX Harassment, Discrimination, Sexual Misconduct, Sexual Harassment, Sexual Violence, Sexual Assault, Sexual Abuse Awareness and Prevention Training.' This training occurs during new hire orientations and new student orientations.

PROHIBITED CONDUCT

Penrose Academy does not tolerate sexual Misconduct, including sexual harassment. Such conduct harms the well-being of our community members, our learning environments, working environments, and the collegial relationships among students, faculty, and staff that characterize the culture of Penrose Academy. Therefore, all prohibited conduct under this policy is regarded as severe academy offenses, and violations may result in discipline, including the possibility of separation from the Academy.

Penrose Academy does not discriminate based on sex in its education programs or activities. Title IX requires Penrose Academy of the Education Amendments of 1972 (Title IX) and 34 C.F.R. Part 106 not to discriminate in such a manner. The requirement not to discriminate in the education program or activity extends to admissions and employment. Inquiries about the application of Title IX and 34 C.F.R. Part 106 may be referred to Penrose Academy's Title IX coordinators, the United States Department of Education, Office for Civil Rights, Assistant Secretary for Civil Rights, or both.

Further, Penrose Academy is committed to providing safe and non-discriminatory learning and working environments for all members of the Academy's community. Therefore, Penrose Academy does not discriminate based on sex or gender in any of its education or employment programs or activities as outlined in the policy 'Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence. This policy prohibits behavior that violates Title IX, VAWA, Title VII, and Clery Act, and Penrose Academy's Code of Conduct.

Penrose Academy adopts this policy with a commitment to eliminating, preventing, and addressing the effects of prohibited conduct and fostering a community of trust and mutual respect in which prohibited conduct is not tolerated.

Penrose Academy strives to cultivate a climate where all individuals are well-informed and supported in reporting prohibited conduct, providing a fair and impartial process for all parties.

Sexual harassment means conduct based on sex that satisfies one or more of the following:

1. An employee of the academy conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct. 'Quid Pro Quo'.
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the academy's education program or activity; or "sexual assault," "dating violence," "domestic violence," or "stalking" as defined for VAWA purposes.
3. Sexual assault, dating violence, domestic violence, or stalking as defined by federal statutes known as the Clery Act and the Violence Against Women Act (VAWA).
4. Sexual harassment under Title IX includes harassment based on sexual orientation and gender identity.

Penrose Academy's Title IX policy applies to all persons involved in the Academy's operation. It prohibits unlawful harassment by academy employees, students, customers, vendors, or anyone who does business with the Academy. Any employee, student, or contract worker who violates this policy will be subject to disciplinary action. In addition, Penrose Academy will take appropriate another personation to the extent to which a customer, vendor, or another person with whom Penrose Academy does business engages in unlawful harassment or discrimination.

Penrose Academy shall disseminate this policy to the school community through publications on the Penrose Academy website, Penrose app, new employee and student orientations, and other appropriate communication channels. In addition, the Academy will respond quickly to all reports and take appropriate action to prevent, correct, and, if necessary, discipline behavior that violates this policy. Additional information can be found on the Office of Civil Rights website at www.HHS.gov or call Toll Free: (877)969.6775.

RESPONSE TO SEXUAL HARASSMENT

A recipient with actual knowledge of sexual harassment in an education program or activity of the Academy against a person in the United States must respond promptly in a manner that is not deliberately indifferent. A recipient is intentionally indifferent only if their response to sexual harassment is unreasonable considering the known circumstances.

Educational program or activity includes locations, events, or circumstances over which the Academy exercised substantial control over both the respondent and the context in which the sexual harassment occurs and consists of any building owned or controlled by a student organization that a postsecondary institution officially recognizes.

The Academy will treat complainants and respondents equitably. The Title IX coordinator must promptly contact the Complainant to discuss the availability of supportive measures, consider the Complainant's wishes concerning supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the Complainant the process for filing a formal complaint.

DEFINITIONS

Quid Pro Quo Harassment is when a school employee conditions educational benefits on participation in unwelcome sexual conduct.

Sexual Misconduct is defined as sexual assault, sexual harassment, sexual intimidation, dating violence/domestic violence, sexual exploitation, and stalking.

Sexual harassment is defined as unwelcome conduct of a sexual nature. It includes quid pro quo, unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical behavior of a sexual nature. Other unwelcome conduct is so severe or pervasive it interferes or creates a hostile environment. Sexual harassment is conduct that explicitly or implicitly affects a person's employment or education, interferes with a person's work or educational performance, or creates an environment where a reasonable person would find the conduct intimidating, hostile, or offensive. Such behavior only has to happen once to violate the policy. Less severe behaviors violate the policy when pervasive or repeatedly occur, such as sexual comments or requests for dates after the person has already said no.

Sexual intimidation is defined as threatening or coercive behavior of a sexual nature, such as exposing oneself and sexual extortion.

Sexual exploitation is defined as taking sexual advantage of someone without their consent, such as prostituting someone and sharing images.

Sexual violence is physical and sexual acts done without the other person's consent or when the other person cannot consent to the activity. Sexual violence includes sexual assault, rape, battery, sexual coercion, domestic violence, dating violence, and stalking.

Domestic violence is defined as abuse committed against an adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant, or someone with whom the abuser has a child, has an existing dating or engagement relationship, or has had a former dating or engagement relationship.

Dating violence is defined as abuse committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

Sexual assault occurs when physical or sexual activity is done without the other person's consent or when the other person cannot consent to the action. The activity or conduct may include physical force, violence, threat, intimidation, ignoring the other person's objections, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, and taking advantage of the other person's incapacitation (including voluntary intoxication).

Stalking is a course of conduct directed at a person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress. Such conduct includes physical contact, verbal contact, electronic contact, following someone, and sending unwanted social-media posts.

Consent is a mutual agreement to engage in an activity. Joint engagements are informed, voluntary, and revocable. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity. Consent must be given without coercion, force, threats, or intimidation. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately.

Incapacitation is when a person is incapable of giving consent, such as sleep, unconsciousness, intoxication, disabilities, or injuries.

PREVENTION

Students and employees are required to take the 'Title IX Harassment, Discrimination, Sexual Misconduct, Sexual Harassment, Sexual Violence, Sexual Assault, Sexual Abuse Awareness and Prevention Training.' This training occurs during new hire orientations and new student orientations.

GRIEVANCE POLICY AND PROCESS

Notify a Title IX coordinator as soon as possible after the incident. Reports of sexual harassment may be verbal or written and may be received at any time.

FORMAL COMPLAINT

A Formal Complaint means a document filed by a Complainant and signed by the Title IX coordinator alleging sexual harassment or other violations of the Academy's Title IX policy against a respondent and requesting that the Academy investigate the allegation of sexual harassment and not allow an inappropriate situation to continue, regardless of who is creating the situation. No employee, contract worker, student, vendor, or another person who does business with Penrose Academy is exempt from the prohibitions in this policy. Faculty/Staff will refer all harassment complaints to the Title IX Coordinator for student-related complaints and complaints involving an employee.

To facilitate the investigation, a student complaint should include details of the incident or incidents, names of the individuals involved, and terms of any witnesses. Incident reports and complaint forms can be obtained from the Student Services department or the Title IX coordinator for an Incident Report.

The Title IX coordinator can assist students in completing this report and notifying the appropriate authorities, if necessary and requested by the alleged victim. In addition, Penrose Academy ensures that the employee designated to serve as Title IX coordinator has adequate training on what constitutes sexual harassment, including sexual violence, and that students understand how Penrose Academy's complaint procedures operate.

Complainant means an individual alleged to be the victim of conduct that could constitute sexual harassment or other violations of the Academy's Title IX policy. When a formal complaint is filed, a complainant must be participating in or attempting to participate in the education program or activity of the Academy with which the formal complaint is filed.

Respondent means an individual reported to be the perpetrator of conduct that could constitute sexual harassment or other violations of the Academy's Title IX policy. Respondents are always presumed innocent; or, more technically, not responsible for sexual harassment. Respondents may not be sanctioned unless and until an investigation is completed and a final decision rendered.

ADVISORS

Complainants and respondents may have an advisor. Title IX advisors may be a Penrose Academy faculty or staff member, another Penrose Academy student, a friend, a parent, an attorney, or any other person of the student's choosing.

The student must notify The Title IX coordinator two working days before conducting meetings or hearings if accompanied by an advisor.

Advisors may:

- Accompany you in any conduct proceedings.
- Advise you in the preparation and presentation of sharing of information.
- Advise you in the preparation of any appeals or sanction reviews.

During conduct proceedings, complainants and respondents are expected to ask and respond to questions independently. Advisors may advise but may not make a presentation or represent you. Advisors may consult with you but may not speak on your behalf. Delays in the conduct process will not normally be allowed due to scheduling conflicts with advisors. Advisors may not be disruptive to the operation.

Upon receiving a complainant, the Title IX coordinator will:

- Contact the Complainant as soon as practicable.
- Notify the Complainant of their right to file a formal complaint and the grievance process.
- Discuss and implement supportive measures. Title IX Coordinator will consider supportive measures but is not bound by the Complainant's wishes.
- Dismissal of Formal Complaint

The Title IX Coordinator will dismiss a formal complaint if:

- The allegations do not establish sexual harassment, even if they are true.
- The allegations did not occur in connection with Penrose Academy's programs or services.
- The allegations did not occur in the United States.
- The respondent's employment with or enrollment at Penrose Academy ends.
- Specific circumstances prevent the Academy from gathering sufficient relevant evidence to reach a final decision (e.g., the passage of time, unavailability of witnesses, or other information).

The Title IX coordinator will document the basis for any formal complaint's dismissal.

DISABLED STUDENTS

A disabled student's status as a respondent does not waive or otherwise affect their protections under the IDEA, the A.D.A, or Section 504. Generally subject to statutory exceptions, an IDEA or Section 504-eligible student may not be disciplined for misconduct that is a manifestation of their disability.

RETALIATION PROHIBITED

Penrose Academy or another person may not intimidate, threaten, coerce, or discriminate against any individual to interfere with any right or privilege secured by Title IX or because the individual has made a report or complaint, testified, assisted, participated, or refused to participate in any manner in a Title IX investigation, proceeding, or hearing.

Penrose Academy will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except otherwise noted in regulations.

Charging an individual with a code of conduct violation for making a false statement in bad faith during a grievance proceeding does not constitute retaliation, provided that a determination regarding responsibility alone is not sufficient to conclude that any party made a materially false statement in bad faith.

TEMPORARY REMOVAL

The Academy may remove a respondent from the education program or activity on an emergency basis, provided that the Academy undertakes an individualized safety and risk analysis and determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal.

ADMINISTRATIVE LEAVE

A non-student employee respondent may be placed on temporary administrative leave during the pendency of a grievance process.

SUPPORTIVE MEASURES

Title IX was enacted to prevent sex discrimination and harassment from adversely affecting access to educational opportunities.

- Supportive measures to restore or ensure continued access to educational opportunities are provided to the Complainant.
- Supportive measures provided to the Complainant will not be punitive or unreasonably burdening to the respondent.
- Non-exclusive examples of supportive measures include no-contact orders, counseling, course modifications, schedule changes, transfers, increased security, and monitoring.

The Title IX coordinator will consider but is not bound by the Complainant's wishes.

Notice of Allegations Upon Receipt of Formal Complaint, the Title IX Coordinator will notify the Complainant and the respondent in writing when a formal complaint is filed. In addition, supplemental notice will be provided to the Complainant and the respondent if new allegations arise during the investigation.

NOTICE OF ALLEGATIONS UPON RECEIPT OF FORMAL COMPLAINT

The Title IX coordinator will notify complainant and respondent, in writing, when a formal complaint is filed. Supplemental notice will be provided if new allegations arise during the investigation.

NOTICE TO THE RESPONDENT INCLUDES:

- A statement of the allegations in sufficient detail permits the respondent to prepare a response.
- A statement respondent is presumed not responsible until a final decision is rendered.
- The parties' right to inspect the formal complaint and all relevant evidence.
- The parties' right to be represented by an advisor, who may be an attorney.
- Declaration of Student Code of Conduct prohibiting false statements or representations.
- Sufficient details with sufficient time to prepare a response before any initial interview.
- A statement stating the respondent is presumed not responsible and that a determination regarding responsibility is made after the grievance process.
- The notice must inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney and may inspect and review evidence.
- The notice must inform the parties of any provision in the Academy's code of conduct that prohibits knowingly making false statements or submitting false information during the grievance process.

PROCEDURES FOR THE INVESTIGATION OF COMPLAINTS

The Title IX coordinator or designee may serve as the investigator. Investigators will maintain the presumption of innocence until the investigation is completed.

In response to all complaints, Penrose Academy ensures prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses, written responses, and other evidence.

The time necessary to investigate will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint.

INVESTIGATION PROCEDURAL STEPS:

- Appoint an investigator
- Pre-Investigation gathering of evidence
- Witness interviews
- Delivery of relevant evidence and written responses
- Investigation report
- Questions and answers period
- Findings of facts & credibility determinations.

INVESTIGATION OF COMPLAINTS

During the investigation, the Academy will provide interim measures, as necessary, to protect the safety and well-being of employees/students involved.

Reasonable academic accommodations will be provided during and after the alleged Title IX or VAWA offense. If the Academy determines that unlawful harassment or sexual violence has occurred, immediate and appropriate corrective action will be taken following the circumstances involved. And the Academy will take steps to prevent the recurrence of any harassment or discrimination.

Any employee or student determined by the Academy to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, including termination.

Reports of sexual violence should be made to "911" or local law enforcement to initiate a criminal investigation. The criminal process is separate from the Academy's disciplinary process. Suppose an employee or contract worker is not satisfied with the Academy's handling of a harassment or discrimination complaint. In that case, they may also contact the appropriate state or federal enforcement agency for legal relief.

CONFIDENTIALITY

Penrose Academy shall maintain confidentiality for all parties to the extent possible; absolute confidentiality cannot be guaranteed. In cases where a student/staff member does not consent to an investigation, Penrose Academy will weigh the student/staff member's request for confidentiality against the impact on the Academy to determine whether an investigation must proceed safely. Complainants should be aware that, in a formal investigation, due process requires that the charging party's identity and the complaint's substance be revealed to the person charged with the alleged harassment.

INTERVIEWS AND INFORMATION GATHERING

INTERVIEWING COMPLAINANT AND RESPONDENT

- The Complainant and respondent will be interviewed in every case.
- The interview will be preceded by written notice that gives the parties adequate time to prepare and identifies the interview's date, time, and place.
- Both parties and their advisors may attend the interview.
- Direct exchanges between the parties and advisors are prohibited.
- The investigator will create a written summary of the interviews as soon as practicable.

INTERVIEWING WITNESSES

All identified eyewitnesses will be interviewed. Questioning will cover the allegations, relationship to parties, and the identification of other witnesses and information the parties may not know. Investigators will create a summary of the interview as soon as practicable.

GATHERING OF INFORMATION

RELEVANT EVIDENCE

Title IX does not assume investigators will apply the rules of evidence like lawyers in a trial. Instead, investigators will consider information relevant if it makes the existence of an allegation, or a response to an allegation, more or less likely.

RAPE-SHIELD

A rape shield law is a law that limits the ability to introduce evidence or cross-examine rape complainants about their past sexual behaviors. Information about the complainant's sexual behavior or proclivities is irrelevant unless it is about the Complainant's sexual conduct with the respondent to prove consent.

PRIVILEGED INFORMATION

Without a party's written consent, the investigator will not seek, access, or rely on privileged information.

When investigating a formal complaint, the Academy will:

- Ensure that the burden of proof and the burden of gathering evidence sufficient to determine responsibility rests on the Academy and not on the parties.
- Provide an equal opportunity for the parties to present witnesses, including fact and expert witnesses and other inculpatory and exculpatory evidence.
- Not restrict the ability of either party to discuss the allegations under investigation or to gather and present evidence.
- Provide the parties with the same opportunities to have others present during any grievance proceeding, including an advisor of their choice and relevant evidence.
- Provide, to a party whose participation is invited or expected, written notice of the date, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate.
- Provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint. And create an investigative report that fairly summarizes relevant evidence and, at least ten days before a hearing or other time of determination regarding responsibility, send to each party and the party's advisor if any, the investigative report for their review and written response.

INVESTIGATIVE REPORT

The investigator completes the investigative report within sixty (60) days. The Title IX Coordinator may grant an extension for a good cause. The investigative report does not resolve credibility issues but fairly summarizes the relevant evidence and information that may bear on the decision-makers resolution of credibility issues. Credibility determination may be based on various factors, such as ability and capability to observe, consistency with other known facts, consistency over time, relationship to parties, and others.

The investigative report contains the following documents:

- Cover letter
- Complainant summaries
- Respondent summaries
- Witness summaries
- Investigative report
- Other relevant information

DELIVERY OF INVESTIGATIVE REPORT

The investigator will simultaneously deliver the investigative report to the Title IX coordinator and the parties.

PARTIES QUESTIONS AND RESPONSES

After receiving the investigative report, the parties may submit written questions to the opposite party or witnesses and file a response within the time frame permitted by the investigator. The investigator will submit written questions and respond to each party. If the investigator declines to submit a question, they must notify the party who submitted it with an explanation.

DETERMINATION REGARDING RESPONSIBILITY

The decision-maker(s), who cannot be the same person(s) as the Title IX Coordinator or the investigator(s), must issue a written determination regarding responsibility. The decision-maker reviews all the information collected during the investigation and concludes that the respondent is or is not responsible for violating Title IX.

The decision-maker may not make credibility determinations based on a person's status as a complainant or respondent. The decision-makers report will be delivered to the parties and the Title IX coordinator.

The Determination Report will be given to both parties simultaneously and will contain the following components:

- Complainant's allegations.
- A description of the procedural steps taken from the receipt of the formal complaint through the determination.
- Site visits or other methods used to gather evidence.

- Findings of fact supporting the determination.
- Penrose Academy's Title IX and Student Code of Conduct Policies.
- A statement and rationale for the result as to each allegation, including determinations of responsibility, disciplinary sanctions, and whether the Complainant will be provided remedies to restore or preserve their equal access to the Academy's education programs and activities.
- The procedure and basis for appeal.

STANDARD OF PROOF

The standard of evidence may be the preponderance of the evidence or clear and convincing evidence. Proof by a preponderance of the evidence means the evidence on one side of a question is more convincing than the evidence on the other. This concept is distinguished from the quantity of evidence. Clear and convincing evidence is a higher standard of proof. Evidence is clear and compelling if the evidence on one side of a question is highly and substantially more provable than the evidence on the other side.

The written determination will include:

- Identification of the allegations potentially constituting sexual harassment.
- A description of the procedural steps taken from the receipt of the formal complaint through the determination.
- Findings of fact supporting the determination.
- Conclusions regarding applying the Academy's code of conduct to the facts.
- A statement of and rationale for each allegation's result. And the Academy's procedures and permissible bases for the Complainant and respondent to appeal.
- The Academy will provide the written determination to the parties simultaneously. The Title IX Coordinator is responsible for the effective implementation of any remedies.
- Appeals
- Penrose Academy will offer both parties an appeal from a determination regarding responsibility, and a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:
 - Procedural irregularity that affected the outcome of the matter.
 - New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal could affect the matter's outcome.
 - Bias or conflict of interest on the part of the investigator or decision-maker.
 - Both the Complainant and the Respondent have thirty (30) days to determine whether to appeal.

APPEALS

Penrose Academy will offer both parties an appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

1. Procedural irregularity that affected the outcome of the matter.
2. New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter.
3. Bias or conflict of interest on the part of the investigator or decision-maker.

Both the complainant and the respondent have thirty (30) days from a determination to file an appeal.

RESOLVING APPEALS

Penrose Academy will assign an appellate officer to review the appeal and determine whether the request implicates one or more of the bases for appeal. If not, the appeal will be denied. If so, the appellate officer will review the entire record and decide whether to grant the request in whole or part. The appellate officer can affirm or reverse the decision, in whole or part, and if necessary, remand the decision to the investigator or decision-maker for further action. Appeal decisions are not final until the appeal process is over or the thirty days for taking an appeal have passed with no request.

HEARINGS PROCEDURES FOR THE TITLE IX SEXUAL HARASSMENT AND RELATED CONDUCT POLICY

These procedures shall govern the hearing process for the formal resolution of formal complaints of sexual harassment, as outlined in the Academy's Title IX Sexual Harassment and Related Conduct Policy. The parties to each formal complaint have the right to a hearing after the Academy's investigation into cases where the parties do not elect an alternative resolution and the formal complaint is not dismissed.

PRE-HEARING STEPS

SELECTION OF HEARING OFFICER

The hearing will be presided over by a hearing officer selected by the Academy.

- The hearing officer will receive annual training regarding the Academy's policies and procedures, handling Title IX cases, how to conduct a hearing and issues of relevance. In addition, training includes when questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant and how to serve impartially by, among other things, avoiding prejudgment of the facts at issue, conflicts of interest, and bias; and other relevant matters. The hearing officer will also be trained on any technology used during a hearing.
- The hearing officer will be impartial and free from bias or conflict of interest. The Title IX Coordinator will provide the parties with the hearing officer's name no later than five business days before the hearing.

Objections to the hearing officer must be raised in writing, detailing the rationale for the objections. They must be submitted to the Title IX coordinator as soon as possible and no later than two business days before the hearing. In addition, the Title IX coordinator will give the hearing officer a list of the names of all parties, witnesses, and advisors before the hearing. The hearing officer will notify the Title IX coordinator of potential bias or conflict of interest.

NOTICE OF HEARING

The complainant and respondent will be notified in writing of the date, time, and location of the hearing; the charges to be reviewed by the hearing officer, including the date, time, location, and essential factual allegations concerning the violation; and the provisions of the policy alleged to have been violated. In general, the respondent and complainant will be provided the notice of hearing at least ten (10) business days prior to the date of the hearing.

WITNESSES

The hearing officer will identify witnesses they wish to hear from at the hearing based on a review of the final investigative report. The Complainant and respondent may each request the presence of any additional witnesses at the hearing, which will be determined based on relevance by the hearing officer.

The Academy cannot compel the attendance of any witness. Only witnesses identified and interviewed as part of the investigation may be called at the hearing. Under minimal circumstances, the Complainant, respondent, or hearing officer may identify a witness with relevant information who has not previously been interviewed. In such a case, the hearing officer will determine whether the new witness' participation at the hearing is relevant and appropriate under the circumstances and, if so, may allow the witness to participate in the hearing or refer the matter to the investigator for additional investigation.

IDENTIFICATION OF HEARING ADVISOR

Parties may have one advisor for all matters leading up to a hearing and a different advisor for the hearing, but no more than one advisor per party may attend the hearing. Irrespective of whether a party plans to change advisors for the hearing or retain the same advisor, all parties must inform the Title IX coordinator at least two business days before the hearing who the party's advisor at the hearing will be and whether that person is an attorney. If a party does not have an advisor for the hearing, the Title IX coordinator will appoint an advisor for the hearing. Selected advisors will be, at no cost to the party, to ask cross-examination questions on behalf of the party.

PRE-HEARING PROCEDURES

The hearing officer or Title IX coordinator may establish additional pre-hearing procedures relating to scheduling, hearing procedures, structure, advance determination of the relevance of specific topics, and other procedural matters. The hearing officer will communicate with the parties about these issues before the hearing and establish reasonable, equitable party participation/input deadlines.

- The hearing officer may invite the parties to submit the questions or topics they wish to ask or discuss at the hearing so that the hearing officer can rule on their relevance ahead of time. This advance review opportunity does not preclude advisors from asking a question for the first time at the hearing or asking for a reconsideration based on any new information or testimony.
- In advance of the hearing, the hearing officer will consider any argument by a party that evidence identified as relevant in the final investigative report is not, in the party's view, relevant. Similarly, evidence identified as directly related but not appropriate by the investigator(s) may be argued to be relevant.
- The hearing officer may rule on these arguments pre-hearing and share those rulings with the parties to prepare for the hearing. In addition, the hearing officer may consult with the Title IX coordinator to make these determinations before the hearing.

REQUEST TO POSTPONE HEARING

Permission to postpone a hearing may be granted provided that the request to do so is based on a compelling emergency and, where possible, such request is provided to the hearing officer and Title IX coordinator at least 48 hours before the time of the hearing.

TIMING

A hearing will be scheduled for a date at least 10 business days after the final investigative report is provided to the parties; typically, a hearing will be held within 15 business days from the date that the final investigative report was provided. This timeframe may be extended for good cause as provided for in the policy; if granted, the reason for the extension will be shared with the parties in writing.

HEARING GUIDELINES

DECORUM

The hearing officer has broad discretion over matters of decorum at the hearing, including the authority to excuse participants who are unwilling to observe rules of etiquette from the hearing process. Suppose a party's advisor does not abide by the Academy's rules of decorum (including, but not limited to, those listed below). In that case, the advisor may be subject to removal, and the Academy will appoint a new advisor for a party for the remainder of the hearing.

- The parties and their advisors will always remain seated during the hearing, including during cross-examination.
- The following behaviors will not be tolerated during the hearing: yelling, verbal abuse, disruptive behavior, interrupting or talking over one another, name-calling, or using profane or vulgar language (except where such language is relevant).
- Any participant in the hearing who is not currently involved in questioning should refrain from disrupting the hearing, making gestures, facial expressions, audible comments, or the like as manifestations of approval or disapproval during any testimony.
- When cross-examining a party or witness, advisors shall not repeat, characterize, express an opinion about, editorialize, or otherwise state any response to the answer given by the party or witness except to ask a follow-up question to elicit relevant evidence.

ADVISORS

While the advisor may be present, the advisor may not speak or otherwise participate in the hearing except for conducting cross-examination when directed by the hearing officer. Other than cross-examination, the advisor may not address the hearing officer and must conduct themselves in a manner that is not disruptive to the hearing or meetings.

PRESENCE AND PARTICIPATION AT HEARING

The Complainant or respondent is not required to participate in person for the hearing to proceed.

- A complainant or respondent may request alternative testimony options that would not require physical proximity to the other party, including testifying via a remote electronic method. This request should be made no fewer than five business days before the hearing.
- If the respondent or Complainant is not in attendance despite being notified of the hearing's date, time, and location, the hearing will proceed. In doing so, the hearing officer will consider the available testimony and evidence. In the absence of clear evidence that emergency circumstances beyond the Complainant's control or respondent prevented the such person from being present, the final determination of the hearing officer will stand.
- If a party or witness elects not to participate in the live hearing or participates in the hearing but refuses to answer questions posed by a party through their advisor, the hearing officer will not rely on any statement of the non-participating party or witness in reaching a determination regarding responsibility. Suppose a party or witness participates in the hearing and answers questions posed by a party through their advisor but refuses to answer questions posed by the hearing officer. In that case, the hearing officer can still rely on that party's or witness's statements when determining.
- "Statements" or purposes of this section means factual assertions made by a party or witness that do not themselves constitute the alleged harassment. Statements might include accurate claims made during an interview or conversation, written by the individual making the assertions (including those found in a Formal Complaint), and memorialized in the writing of another (e.g., in an investigative report, police report, or medical record). Where evidence involves intertwined statements of both parties (e.g., a text message exchange or an email thread) and one party refuses to participate in the hearing or submit to questioning about the evidence. In contrast, the other does participate and answers questions. The statements of only the participating party may be relied on by the hearing officer.
- If a party does not appear for the hearing, their advisor may still occur for cross-examination of the other party and witnesses. Suppose the non-participating party's selected advisor also does not appear for the hearing. The Academy will appoint an advisor to participate in the hearing for cross-examination of the other party on behalf of the non-participating party.

HEARING FORMAT

The hearing officer has broad discretion to designate the hearing format. Subject to the discretion of the hearing officer, hearings will ordinarily begin with introductory remarks by the hearing officer, followed by the hearing officer asking relevant initial questions of the parties as deemed appropriate. During this portion of the hearing, an advisor may confer privately and in a non-disruptive manner with their advisee. However, they are not allowed to make opening statements or address the hearing officer or anyone else at the hearing. After the hearing officer has asked their initial questions of the parties, the hearing officer will permit each party's advisor to ask the other party relevant questions and follow-up questions. The hearing officer may ask follow-up questions as necessary. Subject to the discretion of the hearing officer, questioning of witnesses will generally follow a similar process. Such cross-examination of the parties and witnesses by advisors will be conducted directly, orally, and in real-time by the party's advisor of choice and never by the party personally.

QUESTIONING AT THE HEARING

The parties' advisors, and not the parties themselves, will be permitted to ask the other party and any witnesses relevant and follow-up questions. The advisor will conduct the questioning directly, orally, and in real-time. Suppose a party does not have an advisor present at the hearing. In that case, the Academy will provide, without fee, an advisor of the Academy's choice to conduct a cross-examination on behalf of that party.

RELEVANCE

Only a party or witness may ask relevant cross-examination and other questions. Before a complainant, respondent, or witness answers a cross-examination or further inquiry. The hearing officer will first determine whether the question is relevant and explain any decision to exclude a question as not applicable. Advisors are not permitted to object to the hearing officer's findings regarding relevance during a hearing. In general, the hearing officer will not consider statements of personal opinion or views on any party's public reputation for any character trait as relevant.

PRIOR SEXUAL HISTORY OR DISPOSITION

Questions about the Complainant's sexual predisposition or prior sexual behavior are irrelevant unless such questions are intended to elicit evidence that someone other than the respondent committed the alleged conduct. Specific previous sexual behavior with the respondent may be relevant to establishing consent.

HEARING RECORD

The hearing is closed to the public. However, the Complainant and the respondent can have one advisor of their choice present throughout the hearing. The Academy shall keep a transcript or audio recording of the hearing. Any other recording is prohibited. No camera, T.V., or other equipment, including cellphones, will be permitted in the hearing room except as arranged by the Academy. The parties may inspect and review the transcript or audio recording after completion.

POST-HEARING PROCESS

DETERMINATION REGARDING RESPONSIBILITY

After the hearing, the hearing officer will make a finding by the preponderance of the evidence as to whether the respondent(s) violated the policy and create the written notice of outcome as outlined below.

DISCIPLINARY AUTHORITY

Suppose the hearing officer determines that the respondent is responsible for violating the policy. In that case, the hearing officer will refer the matter to the appropriate disciplinary authority, who will determine the proper remedies and sanction(s) to be imposed.

- The disciplinary authority is typically the academy administrator with appointing or other authority over the respondent as follows:
- For student respondents, the disciplinary authority is the President or designee.
- For staff respondents, the disciplinary authority is the President or designee, who may consult with the respondent's direct supervisor.
- For a respondent who is both a student and employee, the disciplinary authority is the President, Owner, and Chair or a designee if the respondent's primary status is an enrolled student. Such a respondent may be subject to sanctions applicable to students and employees.
- For faculty respondents, the disciplinary authority is the Director of Education or the President, who may consult with the Owner and Chair.

In determining the appropriate sanction(s) and remedies, the disciplinary authority considers several factors, including:

- The nature of the conduct at issue.
- The impact of the conduct on the Complainant.
- The impact on, or implications of the conduct for, the Academy's community.
- If such information is available and known, prior Misconduct by the respondent, including the respondent's relevant previous discipline history, both at the Academy or elsewhere, and any criminal convictions.
- Any expression of remorse or acceptance of responsibility by a respondent.
- Maintenance of a safe and respectful environment conducive to learning.
- Protection of the Academy's community.
- The necessity of any specific action to eliminate the Sexual Harassment, prevent its recurrence and remedy its effects on the complainant or other academy community members, and any mitigating, aggravating, or compelling circumstances to reach a just and appropriate resolution in each case.
- The disciplinary authority will also consider beneficial outcomes that evaluate the safety of the Academy's community, allow a respondent to develop insight about their responsibility for the behavior, learn about the impact of the conduct on the Complainant and the community, and identify how to prevent or change the behavior.

A combination of sanctions may be issued:

- The disciplinary authority will provide the hearing officer with a description of any disciplinary sanctions the Academy imposes on the respondent and whether remedies designed to restore or preserve equal access to the Academy's education programs or activities will be provided by the Academy to the Complainant, as applicable.

WRITTEN NOTICE OF OUTCOME

After the hearing, the hearing officer will create a written notice of outcome that will include the following:

1. Identification of the allegations potentially constituting sexual harassment.
2. A description of the procedural steps from receiving the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings.
3. Findings of facts supporting the determination.
4. Conclusions regarding the application of this policy to the facts.
5. A statement of, and rationale for, the result of each allegation, including a determination regarding responsibility.
6. Description of any sanctions imposed on the respondent and whether remedies designed to restore or preserve equal access to the Academy's education Programs and Activities will be provided to the Complainant; and
7. Information about the appeal process.
8. Regardless of their participation in the Formal Resolution process, the Title IX coordinator will provide the Complainant and respondent the written notice of outcome issued by the hearing officer simultaneously.
9. Remedial measures and sanctions will not be imposed until any appeal process in the policy is final.

INFORMAL RESOLUTION (IR)

As an option to resolve a complaint of discrimination or harassment under Title IX, the parties may request to attempt an Informal Resolution ("I.R."). I.R. is a voluntary resolution process that may be pursued after filing a formal complaint that uses alternative dispute resolution mechanisms, such as mediation, facilitated dialogue, alternative resolution, or administrative resolution.

- Both Complainant and the respondent must agree to pursue I.R., and this agreement must be voluntary, informed, and in writing.
- Neither the Complainant nor the respondent is required to engage in I.R. as a condition of enrollment, continuing enrollment, or enjoyment of any other right.
- At any time before the completion of the I.R. process, the Complainant and respondent may withdraw from I.R., and the complaint will/may be addressed through investigation and the formal resolution process per the applicable policy.
- I.R. is never available to resolve allegations that an employee sexually harassed a student.
- The Complainant and respondent may have an advisor of their choice attend any meetings as part of the I.R. as a support person. The parties, however, are responsible for presenting their information, and advisors are not permitted to cross-examine or question any party or to participate directly in the I.R. process.
- The content of discussions held as part of the I.R. process will be kept confidential and cannot be introduced as evidence in any formal resolution process should I.R. be unsuccessful.

The decision by the Complainant or respondent to participate, refuse to participate, or request to end I.R. and return to the investigation or resolve the complaint using the formal resolution process will not be a factor in any determination made by the decision-maker(s) as to whether a policy violation occurred.

The Complainant and respondent can obtain a request for an I.R. application via the Penrose app and receive a hard copy from the Title IX coordinator. Once a request has been received, the request will be shared with the other party, who may choose to move forward with I.R. or decline to do so. Both parties must consent to I.R. by submitting the online form before any attempts at I.R.

Parties may attempt more than one form of I.R. For example, if an attempt is made to participate in facilitated dialogue. Still, the results are unsatisfactory to both parties; the Complainant or respondent may request a transition to formal mediation. If both parties agree, an attempt at formal mediation will be made.

Once I.R. has been finalized, the terms of the agreement are binding on both parties, and failure to abide by the terms of the resolution may be referred to the appropriate academy process for review and possible corrective action or sanction(s).

TYPES OF INFORMAL RESOLUTION

FACILITATED DIALOGUE

This form of I.R. is most appropriate when both parties are comfortable with direct interaction and management of the discussion but prefer the presence of a neutral third party. The process typically begins with a brief conversation between the facilitator and each party to assess the situation. Once these conversations have occurred, the facilitator schedules a meeting with the parties. During this meeting, the Complainant and respondent participate in a facilitated discussion with the purpose being to develop a shared agreement regarding how to correct the harm perceived or realized by the Complainant. The Complainant and respondent work together to create an agreement that resolves the issue and repairs relationships damaged by the conduct. The neutral facilitator acts as a buffer should emotions run high, or the parties need assistance in maintaining focus on the primary issue(s). The facilitator may suggest breaks or interject comments/questions designed to redirect dialogue productively.

FORMAL MEDIATION

This form of I.R. is most appropriate when the parties are unlikely to solve without support. Mediation involves a neutral mediator who seeks to improve the parties' relationship by assisting them in understanding one another, introducing possible solutions to the problem, and making suggestions for improved communication.

Step 1: Mediator schedules private meetings with each party individually; guidelines for mediation will be presented to both parties.

Step 2: The mediator assesses the appropriateness of mediation as a conflict resolution technique and, if appropriate, schedules a joint meeting with all parties.

Step 3: A meeting is held to allow parties to share their views without interruption, followed by an interactive mediator-guided discussion to determine a resolution, if possible.

Step 4: If a resolution is reached between the parties, each party will review and sign a binding resolution agreement, which will outline the terms of the solution and expectations of the parties moving forward.

ALTERNATIVE RESOLUTION

Alternative options to facilitated dialogue and formal mediation include the following:

- **Shuttle Diplomacy** The crafting of an agreement does not require the Complainant and respondent to participate in an in-person meeting. Instead, a member of the Title IX team will work with the parties individually to create an agreement that satisfies both parties.
- **Acceptance of Responsibility** The respondent can choose to take responsibility for the alleged policy violation(s). When this path is selected, the Title IX coordinator and President work directly with the respondent to determine corrective action(s) and sanctions. Complainant and respondent must agree to this form of I.R., and the parties must also agree to the planned disciplinary/sanctions before I.R.
- **Voluntary Permanent Separation** The respondent can choose to separate from the Academy voluntarily. If the Title IX team accepts this I.R., the respondent must sign a Voluntary Permanent Separation and General Release Agreement to terminate the complaint resolution process.

ADMINISTRATIVE RESOLUTION

In an administrative resolution, the decision-maker will meet separately with the Complainant and the respondent to discuss the allegations. Both parties may have an advisor present for these meetings. The respondent and Complainant may provide a list of questions for the decision-maker to ask the other party. If questions are considered appropriate and relevant by the decision-maker, they may be requested on behalf of the requesting party. In addition, answers to questions will be shared with the requesting party.

The decision-maker will also consider the evidence provided by the investigator, including the investigative report and exhibits. Once the decision-maker has deliberated, they will decide whether the respondent has violated the Academy's policy. Once issued, this determination is binding on both parties. Before the Complainant and respondent can choose this option, both parties must acknowledge that by pursuing an administrative resolution. And they are waiving their rights to a formal solution by a hearing panel unless they choose to end the I.R. process before the decision-makers determination is issued.

The decision maker's determination will be based on the "preponderance" standard of evidence. Ultimately, a decision-maker is balancing probabilities or determining whether it was more likely than not that the alleged conduct occurred. This standard of proof is known as a "preponderance." It only requires that one party can support their position with evidence and credible testimony, "a feather" more than the other. A way to think about the preponderance standard is to picture two people holding shopping bags equal in weight. And each party's supporting evidence and testimony are contained separately in one of the bags. At this point, the parties are balanced at a 50/50 probability. Then, as part of the meeting with the decision-maker, questions are asked that were submitted by the other party.

The information provided in the response is relevant but only slightly crucial to the determination, contributing no more weight to one party's bag than a feather. However, once the information is added, the balance shifts, and the bags are no longer equal. The decision-maker bases their determination on this shift, caused by one piece of evidence or testimony that weighed just a feather but tipped the finding to "more likely than not" favor one party over the other.

The decision-maker has the discretion to determine the relevance of any witness or documentary evidence and may exclude information that is irrelevant, immaterial, cumulative, or more prejudicial than informative.

POSSIBLE SANCTIONS

The sanction of expulsion is not available under an administrative resolution.

RECORDKEEPING

Penrose Academy will maintain records of sexual harassment and other violations of Title IX for seven years. Documents will include investigation records, disciplinary sanctions, remedies, appeals, supportive measures, documentation for why a response was not deliberately indifferent, and measures taken to restore or preserve equal access to educational programs or activities.

Penrose Academy will maintain for a period of seven years records of:

- Each sexual harassment investigation includes any determination regarding responsibility, audio or audiovisual recording or transcript required, disciplinary sanctions imposed on the respondent, and any remedies provided.
- Any appeal and the result from there.
- Any informal resolution and the result from there.

In response to receipt of actual knowledge of sexual harassment, the Academy will create and maintain, for seven years, records of any actions, including any supportive measures taken in response to a report or formal complaint of sexual Reporting Requirements.

REPORTING REQUIREMENTS

Victims of sexual misconduct should be aware that school administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. Penrose Academy will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions considering the danger.

ADDITIONAL INFORMATION

The U.S. Department of Education Office for Civil Rights ("OCR") investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information, visit the OCR website at: www.HHS.gov

SECTION TEN: MISCELLANEOUS

JOB PLACEMENT AND INDUSTRY NETWORKING EVENTS

Penrose Academy is committed to educating, empowering, and connecting our students to meaningful work in the professional beauty industry. Our campus maintains a Student Services department and job placement support can be found throughout our activities. From Industry Networking Events to online training to Job Boards on our Penrose App, Penrose Academy is committed to transitioning our students into graduates and then into gainfully employed individuals.

Penrose Academy hosts Industry Networking Events, which are held approximately two times annually, usually on Wednesdays. Local salons, spas, medspas and nail salons/spas are invited to attend. Students are encouraged to participate in these Industry Networking Events and are prepared with a Career Prep class prior to graduation. Students also prepare, create, update and maintain a professional resume as they progress through the curriculum. If Industry Networking Events are not possible due to extenuating circumstances, the Penrose App Job Board will continue to be updated with employment opportunities.

ELECTRONIC COMMUNICATION POLICY

Electronic communications sent by Penrose Academy are used to support education, scholarly communication, administration and compliance related information. Electronic communication is not different from any other form of communication and is subject to a wide range of applicable federal and state laws and regulations, including public records disclosure/retention requirements.

By consenting to electronic communications, a student is agreeing to electronically access, receive, review, sign or authenticate certain documents and forms and that such documents and forms may be retained solely in an electric format. Any electronic signatures provided are binding to the same extent as an ink signature.

All communications provided electronically will be either directly to an email address provided by the student, through the Penrose Academy app or directly by text/SMS message to a mobile number provided by on the application for enrollment. Penrose Academy may use such means of communication even if costs to receive such phone messages, text messages, e-mails or communications sent via other means will occur.

The communications sent electronically would include, without limitation, all regulatory and other notices and disclosures required by federal and state law, account statements, enrollment documents, all future tax forms, policies regarding privacy, Annual Safety and Security Reporting disclosures, notifications regarding emergencies and/or school closures, academic progression and other information.

CHANGES IN PROGRAM

Penrose Academy reserves the right to change or modify the curriculum, schedule, fees, price and/or equipment. Penrose Academy also reserves the right to shift, modify, reschedule, cancel or postpone any program when enrollment is insufficient or due to uncontrollable circumstances and commits to provide advance notice when possible.

FACULTY AND STAFF OFFICE HOURS

Penrose Academy maintains office hours for faculty and staff to provide for timely and meaningful interaction among faculty and students. The table below outlines the office hour schedule by department. To ensure adequate time and privacy, office hours with faculty members are requested through the Penrose App.

DEPARTMENT	OFFICE HOURS		
	DAILY	MONDAY – THURSDAY	FRIDAY - SATURDAY
Student Services*		3:00PM – 6:00PM	3:00PM – 5:00PM
Financial Aid		3:00PM – 5:30PM	3:00PM – 4:30PM
Operations	1:00PM – 3:00PM		
Laser and Esthetics Faculty	8:00AM – 8:30AM		4:30PM – 5:00PM
Cosmetology Hybrid Faculty	8:00AM – 9:00AM		
Hair Hybrid Faculty	8:00AM – 9:00AM		

*Graduating students have additional office hours from 9:00 AM – 11:00 AM Monday through Saturday.

SECTION ELEVEN: SCHEDULES AND CAMPUS CLOSURES FOR HOLIDAYS AND BREAKS

Penrose Academy will be closed for the following holidays and breaks:

Holidays

New Year's Day
Memorial Day
Independence Day
Thanksgiving Day
Christmas Day

Breaks

One week prior to or after Independence Day
Day after Thanksgiving
One week (+/-) between Christmas and New Years Labor Day

Penrose Academy's intention is to remain committed to our Educational Calendar. However, we reserve the right to reschedule, postpone or cancel classes at any time. If inclement weather or an emergency that poses an endangerment, the President may choose to close the school, wherein students' contract will be extended by the same amount of time or hours will be offered to help the student.

SCHEDULES

Cosmetology Hybrid 1500 Hours

Four Days | 1295.5 clock hours | 204.5 distance education hours | 47 weeks | 30 on campus hours per week | 2 online hours per week (zones 1-4) | 9.5 online hours per week (zones 5-6)

Wednesday 9:00AM-5:00PM, with one 30-minute break
Thursday 9:00AM-5:00PM, with one 30-minute break
Friday 9:00AM-5:00PM, with one 30-minute break
Saturday 9:00AM-5:00PM, with one 30-minute break

Hair Hybrid Four Day

Four Days | 880 clock hours | 120 distance education hours | 30 weeks | 30 on campus hours per week | 4 online hours per week

Wednesday 9:00AM-5:00PM, with one 30-minute break
Thursday 9:00AM-5:00PM, with one 30-minute break
Friday 9:00AM-5:00PM, with one 30-minute break
Saturday 9:00AM-5:00PM, with one 30-minute break

Esthetics Four Day

Four Day | 600 clock hours | 20 weeks | 30 hours per week

Wednesday 8:30AM-4:30PM, with one 30-minute break
Thursday 8:30AM-4:30PM, with one 30-minute break
Friday 8:30AM-4:30PM, with one 30-minute break
Saturday 8:30AM-4:30PM, with one 30-minute break

Esthetics Two Day

Two Days | 480 clock hours | 120 distance education hours | 30 weeks | 16 on campus hours per week | 4 online hours per week

Monday 8:30AM-5:00PM, with one 30-minute break
Tuesday 8:30AM-5:00PM, with one 30-minute break

Laser

88 clock hours | 4 weeks | 26 hours per week

Monday 9:00AM-4:00PM, with one 30-minute break
Tuesday 9:00AM-4:00PM, with one 30-minute break
Wednesday 9:00AM-4:00PM, with one 30-minute break
Thursday 9:00AM-4:00PM, with one 30-minute break

Laser Midday

88 clock hours | 8 weeks | 12 hours per week

Monday 12:00PM-4:00PM
Tuesday 12:00PM-4:00PM
Wednesday 12:00PM-4:00PM

Hair Hybrid Two Day

Two Days | 800 clock hours | 200 distance education hours | 50 weeks | 16 on campus hours per week | 4 online hours per week

Tuesday 8:30AM-5:00PM, with one 30-minute break
Wednesday 8:30AM-5:00PM, with one 30-minute break

Esthetics Nights

Nights | 480 clock hours | 120 distance education hours | 30 weeks | 20 hours per week

Monday 5:00PM-9:00PM
Tuesday 5:00PM-9:00PM
Wednesday 5:00PM-9:00PM
Thursday 5:00PM-9:00PM

Laser Night

88 clock hours | 6 weeks | 16 hours per week

Monday 5:00PM-9:00PM
Tuesday 5:00PM-9:00PM
Wednesday 5:00PM-9:00PM
Thursday 5:00PM-9:00PM

PENROSE ACADEMY STUDENT CATALOG ACKNOWLEDGEMENT (APRIL 2024)

I, _____, fully understand and have received a copy of, and commit to, each policy and guideline listed in Penrose Academy's Student Catalog as described above on this date, prior to receiving the enrollment agreement. I have also received web links to all published information on the Penrose Academy website to review consumer information/gainful employment disclosures including graduation and placement rates as well as median loan debts of Penrose Academy graduates and safety and security reports.

Print Student Name

Student Signature

Date

Penrose Academy Representative Signature

Date

Parent/Legal Guardian (student under 18)

