ACADEMY DI CAPELLI

Student Catalog

Cosmetology | Barbering | Esthetics

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Wallingford Campus

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ACADEMY DI CAPELLI PROFILE

Mission Statement

To provide the highest quality cosmetology, barbering or esthetics education, while maximizing our students' natural talents and abilities. We will prepare students to become a valuable resource in their occupation and to encourage self-growth and motivation, as well as professionalism. Our highly skilled and trained instructors have many years of experience in the hair and skin care industry and provide valuable practical, hands-on training in a small class setting to give all students the maximum educational experience. We are committed to providing a solid basis for entry-level positions into competitive workplaces of cosmetology, barbering or esthetics. Towards this goal, we maintain a working partnership with such workplaces, allowing us to direct, focus and tailor our program(s) to recognize the needs of the finest organizations. We seek to provide training that fulfills the wish list of these quality workplaces and produce graduates who are immediately employable. A second goal is unparalleled job placement, including assistance securing employment with professionals throughout the graduate's career.

General Information

Academy Di Capelli is owned by Christine Papale and Michelle Kelley.

Academy Di Capelli's programs are offered in English only.

Available Programs: Cosmetology (1500 hours) Barbering (1000 hours) Esthetics (600 hours)

Additional Location: East Hartford Campus 1010 Main Street East Hartford, CT 06108 860-461-0697

Academy Di Capelli reserves the right to make changes to the Catalog or any policy and procedure at the owner's discretion (in accordance with NACCAS, Department of Higher Education, and the Education Department) without prior notice. This includes any verbal discussions during any student/staff meeting(s).

Please note that Academy Di Capelli may furthermore be known in this document as "ADC."

Facility

Academy Di Capelli is a state-of-the-art facility spread across two levels. The administrative offices are located on the main floor, along with the admissions office, a retail store and public ATM.

The Cosmetology clinic floor, located on the main floor, is equipped with twenty-seven hydraulic styling chairs, six shampoo stations, five over-head dryers, two manicure stations, as well as the clinic dispensary and color bar. There is also a mannequin/transitional area, with another dispensary, student locker room and two restrooms. The freshman room, located on the upper floor, has comfortable seating for up to twenty students plus ample counter space for practical work. Next door to the freshman room is the theory room with seating and desk space for up to twenty-four students. An additional restroom is located on the upper floor.

The Esthetics clinic area is located on the upper floor and contains ten facial beds with steamers, machines and product carts, along with a dispensary. Two theory rooms are also located on the upper floor and can fit up to ten students comfortably in each room.

The Barbering clinic area is located on the main floor and is equipped with nine barber stations, a shave station and two shampoo stations. The Barbering area includes student lockers, a theory classroom with seating for up to twelve students, a transitional clinic area, a restroom, and student lunch/break room.

Administrative Staff and Faculty

Administrative Stair		Barbering Faculty	
Christine Papale	CEO/Owner	Steve Chaparro	Instructor
Michelle Kelley	President/Owner	Cheyenne Bushnell	Instructor
Breana McNair	Vice President/Counsel	Esthetics Faculty	
Tracy Swinarski	Financial Aid Director	Andrea Alchimio	Esthetics Director

Lidia Tulo Admissions Coordinator Stephanie Torres Instructor

Cosmetology Faculty Ana Hernandez Instructor

Johanne Mottola Instructor Olivia Loomis Instructor
China Culbreath Instructor

Nancy Slavin Instructor

Instructor

Accreditation and Agency Approval

Listed below is the contact information for the agencies and governmental bodies that accredit and approve Academy Di Capelli and its programs.

National Accrediting Commission of Career Arts & Sciences (NACCAS)

3015 Colvin Street Alexandria, VA 22314 Phone: 703-600-7600

The State of Connecticut Department of Public Health

410 Capital Avenue P.O. Box 340308 Hartford, CT 06134 Phone: 860-509-7603

Office of Higher Education Executive Director

450 Columbus Boulevard, Suite 707

Hartford, CT 06103 Phone: 860-947-1800 Fax: 860-326-0567

www.ctohe.org/studentcomplaints.html

U.S. Department of Education

400 Maryland Ave, SW Washington, DC 20202 Telephone: 1-800-872-5327

www.ed.gov

VA Benefits: 1-888-442-4551

Grievances & Complaints

Grievances/Complaints/Inquiries

ADC does not have any policy or acts in any manner which discourages or prohibits the filing of a grievance, inquiry or complaint regarding the school's operations with the Executive Director of Higher Education.

Grievance/Internal Complaint Procedure

Any complaint by a student that cannot be resolved by a staff member should be brought to the attention of the Administration. If the complaint is not resolved and the student wishes to pursue the matter, the student may request a complaint form to fill out. The form must be completed and returned. The complaint will then be reviewed by the owners.

The student will receive a written response within fourteen days of receiving the completed complaint form. If the situation is not resolved to the student's satisfaction and the student wishes to pursue the matter further, the student may contact the Executive Director of Higher Education or NACCAS at the addresses listed previously. All records of complaints and their resolutions will be retained according to the record retention policy of the school.

Privacy Rights and Student Access to Files

The Family Educational Rights and Privacy Act (FERPA) is a Federal Law that protects the privacy of student educational records. FERPA gives students and parents/guardians of dependent minor's certain rights with respect to their education records. Students and parents/guardians of dependent minors have the right to inspect and review their education records maintained by ADC. Students and parents/guardians of dependent minors have the tight to request that ADC correct records which they believe to be inaccurate or misleading.

Student files are kept in a locked filing cabinet. Students and parents/guardians of dependent minors may gain access to their files by making a request to the Administration Department. The U.S. Department of Veterans Affairs/State Approving Officials and NACCAS Board of Directors may have access to student files as needed for auditing purposes.

No other third-party can have access to a student file without a written Release of Information Form (each time records are requested) signed by the student describing what information may be released.

ADC does not release any directory information.

Non-Discrimination Policy

ADC does not discriminate against any applicant or student based on race, color, religion, ethnic origin, sex, sexual orientation, marital status, age, or disability. No otherwise qualified person shall, based on such discrimination, be excluded from or denied the benefits of any program or services of the school. The school will make such services available as necessary to the best of our ability to ensure equal opportunity to benefit from the program to all students. Students with disabilities who wish to request reasonable accommodations must contact the ADA Compliance Coordinator. It is the student's responsibility to self-disclose and provide appropriate documentation. The complete Policies and Procedures for Students with Disabilities can be located at: http://www.academydicapelli.com/helpful-information.html

This commitment extends to participation in all educational programs and activities of ADC. We adhere to strong business ethics and will always conduct our business with honesty, fairness and integrity.

SCHOOL POLICIES

Admissions

A personal interview is required of all applicants to determine interest, financial need, and ability to benefit from our training. Additionally, to be accepted to ADC, applicants must meet the following requirements:

- The applicant must be beyond the age of compulsory education (sixteen years old) and must have successfully completed high school or its equivalent as evidenced by any of the items on the following non-exhaustive list: copy of high school diploma; copy of GED certificate; copy of a transcript showing high school completion; certificate of attainment (only applicable to non-Title IV recipients). Students who have been homeschooled must provide third-party verification as evidence of completion of such home schooling. ADC does not accept Ability to Benefit (ATB) students.
- A foreign high school diploma must be verified by an outside agency that is qualified to translate documents into English and confirm the academic equivalent to a U.S. high school diploma.
- Each student must acknowledge that they understand the nature and physical demands of the profession.
- ADC has the right to not accept for admission, any person deemed unable to meet the above requirements and any person convicted: of a felony or misdemeanor; illegal possession, use, or sale of drugs or alcohol; or any sexual misconduct or anyone whom the School Board does not feel will benefit from attending Academy Di Capelli (exceptions at owner's discretion).

Start Dates for 2021

Cosmetology:

January 5: day & evening May 4: day September 28: evening

March 30: evening August 31: day

Barbering:

January 5 May 4 August 31
March 2 July 6 November 2

Esthetics:

January 5: day March 30: evening September 5: day

April 6: day August 10: evening

Transfer & Re-Entry Policies

Transfer Hours

ADC accepts transfers from other approved Cosmetology/Barbering schools. The student must obtain an official transcript with hours and course work from that school. Credit for course work from another school will be accepted if test scores are at 70% or above, if the curriculum aligns with that of ADC, and after skills are reviewed by the Education Coordinator. Is it the responsibility of the student to check that the hours from the previously attended school are accepted by the State of Connecticut Department of Public Health and are sent to the State of Connecticut Department of Public Health by the previous school (ADC can only be responsible for hours completed at our facility). ADC does not initiate any conversation about transferring, or in any way recruits' students attending any other Cosmetology/Barbering school.

If an ADC student requires transfer to another Cosmetology/Barbering school, and all ADC contractual obligations have been met, a transfer of hours will be sent to the State of Connecticut Department of Public Health. Should a student desire to transfer out of ADC, they may request a copy of their transcripts and hours completed upon payment of all debts owed to ADC.

Transfer Students Please Note: Certain Policies, Procedures, Syllabus and Title IV (Financial Aid) in this catalog are subject to be revised according to each individual student's enrollment needs, i.e., how many transfer hours are accepted, etc.

Transferring Campuses

ADC will allow a student to transfer between the Wallingford and East Hartford campuses providing the student continues in the same program. The student will be credited for hours already completed from the sister school if test scores are 70% or above and after skills are reviewed by the Education Coordinator. A new Enrollment Agreement will be executed to reflect the new location and hours left to complete the program.

One transfer per student, per program, will be permitted (exceptions at owner's discretion).

Re-Entry Policy

Any student considered withdrawn or dismissed for academic reasons who subsequently requests readmission shall forfeit any scholarship, discount or tuition waiver previously awarded by the school, but shall retain full credit for all monies paid to the school individually or by any other external source.

Upon compliance with the following guidelines, the student will be readmitted without loss of previous hours clocked, provided the hours have not expired in accordance with State Law. Requirements for re-entry are as follows:

- 1. The student may return 9 months after the last day attended (may return sooner with approval from administration).
- 2. The student must sign an affidavit stating that the concerns causing the discontinuance to have now been resolved and the student may proceed without interruptions.

Attendance Policies

Tardiness

Any student returning more than five minutes late from a break or lunch may receive a written warning. Three written warnings may result in a one-day suspension.

Students who are going to be late or absent must call the school at least fifteen minutes before their scheduled class start. ADC will allow a ten-minute margin with a late pass only, excluding Saturdays. Students are given three late passes on the first day of class and are expected to use them at their discretion. Students will not be allowed to clock in after 8:40 am for cosmetology students and 9:10 am for esthetics students unless they have a doctor's note, legal documentation or late pass.

Saturday Clock-In: Saturday clock-in for Cosmetology and Barbering students is between 7:50 am and 8:00 am. A student clocking in between 8:01 am and 8:10 am is considered late and will receive a written warning. A student clocking in after 8:10 am, without prior notification or permission, will receive a one-day suspension. Saturday clock-in for day-time Esthetics students is between 8:50 am and 9:00 am. A student clocking in between 9:01 am and 9:10 am is considered late and will receive a written warning. A student clocking in after 9:10 am without prior notification or permission will receive a one-day suspension.

Leaving Early: Any student who wishes to leave early must notify an instructor, clock-out, and sign-out with the receptionist at the front desk.

School Closures

ADC is closed for Christmas Eve (evening classes only), Christmas Day, New Year's Eve (evening classes only), New Year's Day, The Fourth of July and Thanksgiving Day. ADC may also close for other reasons such as inclement weather. In the case of an unavoidable and unexpected closure, local news stations WTNH News8 and/or NBC CT will post the information on either the television station or website. It is the responsibility of each student to either call the school or check the above-mentioned news stations for closure information.

Mandatory Days

All Saturdays are mandatory days. Both the day before and the day after a holiday is mandatory unless otherwise specified. Any student absent on a mandatory day will incur a minimum of a one-day suspension. ADC may also declare a specific day mandatory by posting a notification.

Excused/Unexcused Absences

Students are expected to be in school every day according to the contracted schedule per their Enrollment Agreement. Each student is permitted a certain number of written excused absences, in addition to the allowable cushion the school provides (see table below) for emergencies such as illness, bereavement, automobile repair, mandatory work issues or legal issues. Written documentation is required to be considered an excused absence and must be provided the day the student returns to school; otherwise, the absence will be considered unexcused. Students returning to school from a medical absence must be cleared to do so from their physician and must be ready and able to take clients immediately upon their return. If not, the student must remain out of school. The student must call the school as soon as possible to inform of the reason for the absence. Any other absences will be considered unexcused and may cause the student to pay additional charges per hour for instruction past the contracted end date. Students who are absent without notifying the school or receiving prior permission will receive a written warning. Three warnings may result in a one-day suspension.

	No. of Allowable	Allowable Cushion	Additional
	Excused Absences	of Unexcused	Instructional Charge
Program	(with written note)	Absences	(per hour)
Cosmetology	4	120 hours	\$12.62
Barbering	4	75 hours	\$15.70
Esthetics	2	48 hours	\$14.32

Please note: Any student who is absent fourteen consecutive calendar days, not on a LOA, or has not notified the school, will be terminated immediately.

Make-Up Work

Students who come back from a Leave of Absence or have missed any days, have two weeks to make-up any test(s), homework, or project(s) from the date scheduled or assigned. Failure to adhere to the time period will result in a lower overall GPA and loss of personal service privileges. Also, any student switching from part-time to full-time or vice versa will have to adhere to the above policy. It is the student's responsibility to find out from the education coordinator which test(s) or assignment(s) they may have missed. The education coordinator will schedule a time for the student to make-up any tests. Failure to do will result in unsatisfactory completion of the program and therefore, the student will not graduate.

Academic Advising

ADC actively advises students on matters pertaining to academic standing, attendance, financial aid and violations of school policy. Discussions about personal problems that students may have such as substance abuse or mental illness are only initiated by ADC in relationship to the student's ability to perform. If, however, any student reaches out to a staff member, they may suggest that professional counseling would be appropriate. A list with telephone numbers for professional assistance is posted in the break area for students' referral.

ADC or anyone representing ADC does not recommend a specific place or person to administer such counseling.

Graduation & Licensure

Graduation Requirements

- Completion of 1500 hours (Cosmetology); 1000 hours (Barbering); 600 hours (Esthetics)
- Complete all course work, including passing grades on all theory and practical tests
- Complete all homework assignments and projects
- For licensure, Cosmetology and Barbering students additionally must pass the applicable State Board test with a 70% or higher

All students will receive a Diploma (Cosmetology and Barbering) or Certificate of Completion (Esthetics) upon completion of the course with the above conditions met and after all debts owed to the school are paid in full (all final payments must be cash or bank check). Students may also request a copy of their transcripts.

Financial Aid Recipients: must complete Title IV Exit Counseling before graduation.

State Board Review

ADC offers a State Board Review for all eligible students (students who are expected to graduate within one month of the exam). Review classes will be scheduled in accordance with demand, the instructor's availability/schedule, and in a manner that does not conflict with normal classes and clinic hours. If a student graduates without taking part of the review, or does not pass the exam, they are strongly encouraged to return for the review.

Release of Hours

After all debts owed to the school are **paid in full**, with cash or bank check, (credit cards or personal checks will have to wait until cleared by the bank) and all Exit Counseling is completed, hours will then be released to the State of Connecticut Department of Public Health.

State Licensing Disclaimer

The Connecticut Department of Public Health is authorized under Connecticut General Statues Section 19a-14 to determine the eligibility of all applicants for licensure and may deny licensure or impose disciplinary action based upon non-compliance with statutes or regulations, pending or prior disciplinary action in any jurisdiction, incompetence, negligence, fraud or deceit, or has a physical or mental condition which may interfere with safe and effective practice. Pursuant to Public Act 17-112, which become effective on October 1, 2017, the Department of Public Health is not authorized to deny licensure or to take other action against applicants based upon felony convictions.

ADC is not responsible for students denied licensure.

Job Placement Assistance

Although ADC cannot guarantee job placement, we are committed to assisting every student who seeks employment. As part of the training, we provide resume writing classes as well as classes on interviewing skills. We also schedule guest speakers from some of the best salons, shops, and spas in Connecticut where students can meet and talk to possible employers. ADC maintains a file of prospective employers. A list of job openings is available to students and graduates on the school's Facebook and Instagram pages.

While ADC or anyone representing the school actively assists students in finding employment, graduating from ADC does not guarantee placement in the beauty industry. In addition, a criminal background may prohibit a student from obtaining employment.

Interruptions, Course Incompletes, Withdrawals & Leave of Absence Policy

Occasionally, students may experience extended personal or medical problems which make it difficult for them to attend classes as scheduled. ADC may allow a student experiencing such circumstances to take a Leave of Absence (LOA) from their program. All LOAs must be preapproved by the Financial Aid Office, and students must submit their requests to the Financial Aid Office in writing.

The written request for a LOA must be submitted in advance, unless unforeseen circumstances prevent the student from doing so. The request must include the reason for the LOA, the starting and ending date of the LOA, and the student signature. A student is eligible for one LOA during their term of enrollment at ADC. In the event of extenuating/unforeseen circumstances, the Financial Aid Office has the discretion to grant an additional LOA. The minimum length of a LOA is fourteen days; a LOA will not be granted during a student's Level 1/Freshman Phase status. A Level 1/Freshman Phase status is defined as the first 20% of the hours in a student's program of study. ADC may grant a LOA to a student who did not provide the request prior to the LOA due to unforeseen circumstances, such as a car accident, if the Financial Aid Office documents the reason for their decision and collects the request from the student later. In this example, the beginning date of the approved LOA would be determined by the institution to be the first date the student was unable to attend ADC because of the accident.

Any approved LOAs will be granted in accordance with the Federal guidelines for LOA which state that a LOA will not exceed 180-days in a twelve-month period. A student will not be granted a LOA if the LOA together with any additional LOAs previously granted exceeds a total of 180 days in any twelve-month period. A LOA will not be granted to an active student who exceeded or surpassed the 100% point of scheduled hours of their program. Students will not be assessed additional tuition charges while on their LOA. The student's enrollment contract will be extended for the same number of days taken in the LOA. Changes to the contract period on the enrollment agreement must be initialed by all parties or an addendum must be signed and dated by all parties. Students returning from an authorized LOA will retain all credit for clock hours and work projects completed and will return to the SAP status they held prior to the LOA. There must be reasonable expectation that the students will return from the LOA. Students returning from a LOA must coordinate their return with the campus Registrar/Education Coordinator.

Students who fail to return from a LOA on their scheduled return date will be terminated and will be considered dismissed as of the last day in attendance prior to the start of their LOA. At an institution required to take attendance, the withdrawal date for calculating a refund is always the student's last day of attendance.

A student granted a LOA that meets these criteria is not to be considered to have withdrawn, and no refund calculation is required at that time. If enrollment is temporarily interrupted for a LOA, the student will return to school in the same progress status as prior to the LOA. Hours elapsed during a leave of absence will extend the student's contract period by the same number of days taken in the LOA and will not be included in the student's cumulative attendance percentage calculation.

Students who withdraw prior to completion of the course and wish to re-enroll, will return in the same satisfactory academic progress status as at the time of withdrawal. Students who withdraw from the program are required to gather all personal items. Any items left behind by the student will be stored for thirty days, at which time the items become the property of ADC.

Students wishing to withdraw and transfer to another institution must attend an exit interview and pay all monies owed the school or make satisfactory arrangements for debts as approved by ADC. An Official Transcript of Hours will be issued to students who withdraw prior to program completion when the student has successfully completed all the above requirements.

Satisfactory Academic Progress Policy (SAP)

The Satisfactory Academic Progress Policy is consistently applied to all students enrolled at the school. It is printed in the catalog to ensure that all students receive a copy prior to enrollment. The policy complies with the guidelines established by the National Accrediting Commission of Career Arts and Sciences (NACCAS) and the federal regulations established by the United States Department of Education. Students are evaluated in the following three areas: Cumulative Theory Average, Cumulative Practical Average, and Cumulative Attendance Average.

Evaluation Periods

Students are evaluated for Satisfactory Academic Progress as follows: Our school operates on a 900-clock hour academic year.

Cosmetology: 450, 900 and 1200 (scheduled) hours Barbering: 300, 600 and 900 (scheduled) hours

Esthetics: 300 (scheduled) hours

Transfer students are evaluated at the midpoint of their contracted hours or the established evaluation periods above, whichever comes first.

Evaluations will determine if the student has met the minimum requirements for satisfactory academic and attendance progress. The frequency ensures that students have had at least one evaluation by midpoint in the course.

Attendance Progress Evaluations

Students are required to attend a minimum of 70% of the hours possible based on the applicable attendance schedule to be considered maintaining satisfactory attendance progress. Evaluations are conducted at the end of each evaluation period to determine if the student has met the minimum requirements. The attendance percentage is determined by dividing the total hours accrued by the total number of hours scheduled. At the end of each evaluation period, the school with determine if the student has maintained at least 70% cumulative attendance since the beginning of the course which indicates that, given the same attendance rate, the student will graduate within the maximum time frame allowed.

Maximum Time Frame

The maximum time frame (which does not exceed 142% of the course length) allowed for students to complete each course at satisfactory academic progress is stated below:

Program	Maximum Time Allowed	
	Weeks	Scheduled Hours
Cosmetology: 1500-hours		
Full Time Day (31 hrs/wk)	69	2130
Part Time Evening (19 hrs/wk)	113	2130
Barbering: 1000-hours		
Part Time Evening (19 hrs/wk)	75	1420
Esthetics: 600-hours		
Part Time Day (24 hrs/wk)	36	852
Part Time Evening (16 hrs/wk)	54	852

The maximum time frame allowed for transfer students who need less than the full course requirements will be determined based on 70% of the scheduled contracted hours. Students who have not completed the course within the maximum timeframe may continue as a student at the institution on a cash pay basis.

Academic Progress Evaluations

The qualitative element used to determine academic progress is a reasonable system of grades as determined by assigned academic learning. Students are assigned academic learning and a minimum number of practical experiences. Academic learning is evaluated after each unit of study. Practical assignments are evaluated as completed and counted toward course completion only when rated as satisfactory or better (the computerized student management system will reflect completion of the practical assignments as a 100% rating). If the performance does not meet satisfactory requirements, it is not counted, and the performance must be repeated.

At least two comprehensive practical skill evaluations will be conducted during the course of study. Practical skills are evaluated according to text procedures and set forth in practical skill evaluation criteria adopted by the school. Students must maintain a written grade average of 70% and pass a final written and practical exam prior to graduation. Students must make up failed or missed tests and incomplete assignments.

Numerical grades are considered according to the following scale:

90-100 Excellent 80-89 Very Good 70-79 Satisfactory 69 and below Unsatisfactory

Determination of Progress Status

Students meeting the minimum requirements for academics and attendance at the evaluation point are making satisfactory academic progress until the next scheduled evaluation. Students will receive a hard copy of their Satisfactory Academic Progress Determination at the time of each of the evaluations. Students deemed not maintaining Satisfactory Academic Progress may have their Title IV funding interrupted, unless the student is on warning or has prevailed upon an appeal resulting in a status of probation.

Warning

Students who fail to meet minimum requirements for attendance or academic progress are placed on warning and considered to be making Satisfactory Academic Progress while during the warning period. The student will be advised in writing on the actions required to attain satisfactory academic progress by the next evaluation. If at the end of the warning period, the student has still not met both the attendance and academic requirements, he/she may be placed on probation and, if applicable, students may be deemed ineligible to receive Title IV funds.

Probation

Students who fail to meet minimum requirements for attendance or academic progress after the warning period will be placed on probation and considered to be making Satisfactory Academic Progress while during the probationary period, if the student appeals the decision, and prevails upon appeal. Additionally, only students who can meet the Satisfactory Academic Progress policy standards by the end of the evaluation period may be placed on probation. Students placed on an academic plan must be able to meet requirements set forth in the academic plan by the end of the next evaluation period. Students who are progressing according to their specific academic plan will be considered making Satisfactory Academic Progress. The student will be advised in writing of the actions required to attain Satisfactory Academic Progress by the next evaluation. If at the end of the probationary period, the student has still not met both the attendance and academic requirements required for Satisfactory Academic Progress or by the academic plan, he/she will be determined as not making Satisfactory Academic Progress, and, if applicable, the student will not be deemed eligible to receive Title IV funds.

Re-Establishment of Satisfactory Academic Progress

Students may re-establish Satisfactory Academic Progress and Title IV aid, as applicable, by meeting minimum attendance and academic requirements by the end of the warning or probationary period.

Interruptions, Course Incompletes, Withdrawals

If enrollment is temporarily interrupted for a Leave of Absence, the student will return to school in the same progress status as prior to the leave of absence. Hours elapsed during a leave of absence will extend the student's contract period and maximum time frame by the same number of days taken in the leave of absence and will not be included in the student's cumulative attendance percentage calculation. Students who withdraw prior to completion of the course and wish to re-enroll will return in the same satisfactory academic progress status as at the time of withdrawal.

Appeal Procedure

If a student is determined to not be making Satisfactory Academic Progress, the student may appeal the determination within ten calendar days. Reasons for which students may appeal a negative progress determination includes death of a relative, an injury or illness of the student, or any other allowable special or mitigating circumstances.

The student must submit a written appeal to the school on the designated form describing why they failed to meet Satisfactory Academic Progress standards, along with supporting documentation of the reasons why the determination should be reversed. This information should include what has changed about the student's situation that will allow them to achieve Satisfactory Academic Progress by the next evaluation point. Appeal documents will be reviewed, and a decision will be made and reported to the student within ten calendar days. The appeal and decision documents will be retained in the student file. If the student prevails upon appeal, the Satisfactory Academic Progress determination will be reversed, and federal aid will be reinstated, if applicable.

VA Students

Veteran students using GI Bill® educational benefits must adhere to the school's Standards of Academic Progress (SAP) to remain eligible to receive VA payments. If a VA student is not meeting the requirements of the SAP at an evaluation period, the VA student will be placed on academic probation for the subsequent evaluation period. If the VA student does not meet the requirements of the SAP at the next evaluation period, the student will be suspended from using their VA educational benefits until satisfactory standards of progress have been achieved.

The school may allow a VA student to continue while their VA benefits have been suspended, but they will not be certified for VA benefits for that enrollment period. A VA student cannot be certified to use their VA benefits during an appeal, but if successful in their appeal, they can be certified retro-actively for that enrollment period to the VA.

Noncredit, Remedial Courses & Repetitions

Noncredit, remedial courses and repetitions do not apply to this institution. Therefore, these items have no effect upon the school's Satisfactory Academic Progress standards.

Transfer Hours

With regards to Satisfactory Academic Progress, a student's transfer hours will be counted as both attempted and completed hours for the purpose of determining when the allowable maximum time frame has been exhausted.

SAP evaluation periods are based on actual contractual hours at the institution.

PROGRAM INFORMATION

Cosmetology

The Cosmetology program is a 1500 clock hour program, which will prepare students for an entry-level position in the hairdressing profession.

Program Course Description

Content	Theory Hours	Clinic Hours
Sanitation	15	20
Anatomy & Physiology	15	0
Hair Care & Treatments	20	200
Hair Shaping & Styling	75	750
Chemical Procedures	30	200
Skin Care, Facial, Make-Up & Hair Removal	15	80
Manicure & Pedicure	15	40
Business & Professional Relations	10	10
State Laws	5	0
Total:	200	1300

Career Options

Cosmetologist Makeup Artist
Salon Manager Instructor
Salon Owner Product Rep
Color Technician Consultant
Nail Artist
Esthetician

Class Schedule

Full Time Day:

Tuesday, Thursday, Friday: 8:30 am to 5:00 pm

Saturday: 8:00 am to 3:30 pm

Part Time Evening:

Tuesday, Thursday, Friday: 5:00 pm to 9:00 pm

Saturday: 8:00 am to 3:30 pm

Program Cost

Application Fee, non-refundable: \$100
Registration Fee: \$400
State Board Exam Fee, one-time fee: \$65
Tuition: \$18,930
Books & Supplies, non-refundable: \$1,995
Total: \$21,490

Additional Instructional Charges

ADC will charge additional tuition if the student exceeds 1620 scheduled hours at the rate of \$12.62 per hour, or any part thereof, until graduation.

Syllabus

Cosmetology Course Curriculum	Non-Clinic (Theory) Hours	Clinic Hours
Sanitation & Hygiene: Bacteriology, Sterilization, Sanitation, Dispensary, Laws & Lectures, Personal Hygiene & Grooming	15	20
Anatomy & Physiology: Dermatology: skin structure & function; Trichology: hair composition & structure, blood and the nervous system	15	0
Hair Care & Treatment: Shampoo & Rinses: purpose and effects, materials & supplies, types of shampoo; Scalp & Hair Care: including junction of nerves, muscles and blood.	20	200
Hair Shaping & Styling: Hair Shaping, Basic Styling: purpose and effects, materials; Haircutting: trimming; Care of Wigs; Pressing; Thermal Techniques; Finger waves; Pin curls	75	750
Chemical Procedures: Hair Coloring & Lightening: purpose & effects to corrective measures; Chemical Waving; Chemical Hair Relaxing: including scalp & hair analysis; Knowledge of Industry-Related Chemicals; Chemical Make-up and Chemical Interaction for all subject areas	30	200
Skin Care, Facials, Make-Up & Hair Removal: Purpose and effects; Function of nerves and muscles; Facial Cosmetics & Procedures	15	80
Manicure & Pedicure: Preparation; Hand & Arm Massage; Anatomy of Nails; Equipment & Supplies	15	40
Business & Professional Relations: Professional Attitude & Salesmanship; Salon Management; Safety Measures, including equipment and materials	10	10
State Board Laws: Preparation for taking the state mandated test; Overview of Regulations; Guidelines for Employment	5	0
Total 1500 hours:	200	1300

Barbering

The Barbering program is a 1000 clock hour program, which will prepare students for an entry-level position in the barbering profession.

Program Course Description

Content	Theory Hours	Clinic Hours
Sanitation & Hygiene	15	20
Anatomy & Physiology	15	0
Hair Care & Treatments	10	50

Hair Cutting, Styling & Shaving		50	640
Chemical Procedures		30	100
Skin Care, Facials & Manicuring		15	30
Business & Professional Relations		10	10
State Laws		5	0
	Total:	150	850

Career Options

Barber Shop Manager Product Rep
Barber Shop Owner Consultant

Class Schedule

Part Time Evening:

Tuesday, Wednesday, Thursday: 5:00~pm to 9:00~pm

Saturday: 8:00 am to 3:30 pm

Program Cost

Application Fee, non-refundable: \$100
Registration Fee: \$400
State Board Exam Fee, one-time fee: \$65
Tuition: \$15,700
Books & Supplies, non-refundable: \$850
Total: \$17,115

Additional Instructional Charges

ADC will charge additional tuition if the student exceeds 1075 scheduled hours at the rate of \$15.70 per hour, or any part thereof, until graduation.

Syllabus

Barbering Course Curriculum	Non-Clinic (Theory) Hours	Clinic Hours
Sanitation & Hygiene: Bacteriology, Sterilization, Sanitation, Dispensary, Laws & Lectures, Personal Hygiene & Grooming	15	20
Anatomy & Physiology: Dermatology: skin structure & function; Trichology: hair composition &	15	0
structure, blood and the nervous system Hair Care & Treatment: Shampoo & Rinses: purpose and effects, materials & supplies, types of	10	50
shampoo; Scalp & Hair Care: including junction of nerves, muscles and blood. Hair Shaping & Styling: Hair Shaping, Basic Styling: purpose and effects, materials; Haircutting:	50	640
trimming; Care of Wigs; Pressing; Thermal Techniques; Shaving: including fundamentals of shaving the head, neck and face; Beard & Mustache Grooming Chemical Procedures: Hair Coloring & Lightening: purpose & effects, materials & supplies; Chemical Waving; Chemical Hair Relaxing: including scalp & hair analysis; Knowledge of Industry-	30	100
Related Chemicals; Chemical Make-up and Chemical Interaction for all subject areas Skin Care, Facials & Manicures: Purpose & effects; Function of nerves and muscles; Equipment & Supplies	15	30
Business & Professional Relations: Professional Attitude & Salesmanship; Salon Management;	10	10
Safety Measures, including equipment and materials State Board Laws: Preparation for taking the state mandated test; overview of regulations;	5	0
guidelines for employment Total 1000 hours:	150	850

Esthetics

Esthetics is offered in a 600-clock hour program. The program is designed to prepare students for entry-level positions.

Program Course Description

Content		Theory Hours	Clinic Hours
Professional Esthetician		45	25
Understanding Skin		45	0
Practice & Procedures		80	220
Related Services		55	100
Successful Business Management		20	10
	Total:	245	355

Career Options

Esthetician	Instructor
Salon/Spa Manager	Product Rep
Salon/Spa Owner	Consultant
Makeup Artist	

Class Schedule

Part Time Day:

Tuesday, Thursday, Friday, Saturday: 9:00 am to 3:00 pm

Part Time Evening:

Tuesday, Wednesday, Thursday, Friday: 5:00 pm to 9:00 pm

Program Cost

600-hour Program

Total:	\$9,692
Books & Supplies, non-refundable:	\$600
Tuition:	\$8,592
Registration Fee:	\$400
Application Fee, non-refundable:	\$100

Additional Instructional Charges

ADC will charge additional tuition if the student exceeds: 648 scheduled hours at the rate of \$14.32 per hour for the 600-hour program. If any money is owed to the school due to overtime charges, tuition balances, etc., the student will not be able to take final exams until all debuts are paid in full. (special circumstances at owners' discretion may apply).

Syllabus

Esthetics 600-hour Course Curriculum	Non-Clinic (Theory) Hours	Clinic Hours
Professional Esthetician: History of Skin Care; Career Opportunities; Professional Image; Human Relations; Professional Ethics; Bacteriology; Sterilization & Sanitation	45	25
Understanding Skin: Cells, Metabolism & Body Systems; Physiology & Histology; Disorders & Special Procedures; Human Anatomy; Chemistry for Estheticians	45	0
Practice & Procedures: Nutrition; Consultation & Skin Analysis; Cleansing & Preparation of Client; Facial Massage Therapy; Facial Treatments without machines; Electricity; Machines; Facial Treatments with machines	80	220
Related Services: Waxing & Hair Removal; Body Treatments; advanced Topics & Aromatherapy; Color Psychology & Coordination; Professional Make-up Artistry; Manicuring; Chemical & Mechanical Exfoliants	55	100
Successful Business Management: Starting a Salon Business; Sales; Human Relations in Business	20	10
Total 600 hours:	245	355

FINANCIAL INFORMATION

Available Financial Assistance Options

- Full-Tuition Federal Title IV Financial Aid (for those who qualify)
- No Interest, Monthly Installment Payment Plan through ADC (up to 11-months, depending on program length)
- Veteran Education Benefits: ADC is approved by the Connecticut Department of Higher Education for most Veteran Education Benefits (for those who qualify)

Acceptable Methods of Payment

	0 1	
•	Cash	
•	Gasii	

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Credit card

Installment planTitle IV financial aid

Check

VA Benefits Late Payments

Title IV Financial Aid

ADC is currently eligible to participate in Federal Title IV Financial Aid.

Academic Year Definition for Financial Aid

For FAFSA application purposes, an academic year is the twelve months from July 1st to June 30th.

Title IV Awards

Title IV award amounts are estimates only and may be subject to change due to a change in income or other factors. Title IV loans (direct subsidized/unsubsidized loans and parent plus loans) are LOANS and must be repaid.

Title IV Eligibility

A student's eligibility to receive Title IV may be suspended if they have been convicted of a drug-related offense while receiving federal student aid. When a student completes the FAFSA form, they will be asked whether they had a drug conviction for an offense that occurred while receiving federal student aid. If the answer is yes, a worksheet will be provided to help determine whether the conviction affects eligibility for federal student aid. If eligibility for federal student aid has been suspended due to a drug conviction, the student can regain eligibility early by successfully completing an approved drug rehabilitation program or by passing two unannounced drug tests administered by an approved drug rehabilitation program. If convicted of a drug-related offense after the student submitted the FAFSA form, they may lose eligibility for federal student aid and may be liable for returning any financial aid received during the period of ineligibility.

Late Payments

Late Payments in the ADC Installment Plan that are made more than 10 days after the due date will be considered late and will result in an additional late fee of \$25.00. Late payments may result in an immediate suspension; the student may be responsible for additional instructional charges per their program's hourly rate if the suspension causes the student to exceed the allowable cushion of unexcused absences. See chart below:

	No. of Allowable	Allowable Cushion	Additional	
	Excused Absences	of Unexcused	Instructional Charge	
Program	(with written note)	Absences	(per hour)	
Cosmetology	4	120 hours	\$12.62	
Barbering	4	75 hours	\$15.70	
Esthetics	2	48 hours	\$14.32	

Hutchins Grant

The Hutchins Grant is strictly for dependent students who come from households that have multiple children in post-secondary education simultaneously (the student and a sibling). Prospective students may apply for the grant and provide proof of enrollment of the sibling(s), which will determine the grant amount. (Available for Cosmetology and Barbering students only).

Good Student Merit Award

Cosmetology & Barbering Students only: Students must maintain a 92% or above average in both attendance and GPA –AND-have no behavioral issues on file for the duration of their enrollment to receive the Good Student Merit Award upon graduation. (Please Note: make-up hours are not counted towards the attendance rate; students will not be able to make-up hours to achieve this award.)

Award Amounts are:

Cosmetology: \$500.00Barbering: \$250.00

• Esthetics does not qualify for this award

Refund Policy - Notice of Cancellation/Withdrawal

For applicants who cancel enrollment or students who withdraw from enrollment, a fair and equitable settlement will apply. The following policy will apply to all terminations for any reason, by either party including student decisions, course or program cancellation, or school closure.

Any monies due the applicant or students shall be refunded within forty-five days of official cancellation or withdrawal. Official cancellation or withdrawal shall occur on the earlier of the dates that:

- 1. An applicant is not accepted by the school. The applicant shall be entitled to a refund of all monies paid.
- 2. A student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case, all monies collected by the school shall be refunded, except the non-refundable \$100 application fee, regardless of whether the student has started classes.
- A student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In this
 case, he/she shall be entitled to a refund of all monies paid to the school less the non-refundable \$100 application fee and
 \$400 registration fee.
- 4. A student notified the institution of his/her withdrawal in writing.
- 5. A student on an approved leave of absence notifies the school that he/she will not be returning. The date of withdrawal shall be the earlier of the date of expiration of the leave of absence or the date the student notifies the institution that the student will not be returning.
- 6. A student is expelled by the school. (Unofficial withdrawals will be determined by the institution by monitoring attendance as least every 30 days).
- 7. In types 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark on the written notification, or the date said notification is delivered to the school administrator or owner or person.
- For students who enroll and begin classes but withdraw prior to course competition (after three business days of signing the contract), the following schedule of tuition earned by the school applies. All refunds are based on scheduled hours:

Percent of Scheduled Time	0.01% to 4.9%	5.0% to 9.9%	10.0% to 14.9%	15.0% to 24.9%	25.0% to 49.9%	50.0% and over
Enrolled to Total Course Length:						
Total Tuition School Shall	20%	30%	40%	45%	70%	100%
Receive/Retain:						

- All refunds will be calculated based on the students last date of attendance. Any monies due a student who withdraws shall be refunded within forty-five days of a determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student's immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, and instruction has begun, the school will provide a pro-rated refund of tuition to the student OR provide course completion through a pre-arranged teach-out agreement with another institution. If the course is cancelled subsequent to a student's enrollment, and before instruction has begun, the school at its option will either provide a full refund of all monies paid or completion of the course at a later time. If the course is cancelled, after students have enrolled and instruction has begun, the school shall provide a pro-rated refund for all students transferring to another school based on the hours accepted by the receiving school OR provide completion of the course OR participate in a teach-out agreement OR provide a full refund of all monies paid.
- Students who withdraw or terminate prior to course completion are charged a cancellation or administrative fee of \$125.00. This refund policy applies to tuition and fees charged in the enrollment agreement. Other miscellaneous charges

the student may have incurred at the institution (e.g.: extra kit materials, books, products, unreturned school property, etc.) will be calculated separately at the time of withdrawal. All fees are identified in the catalog and in the enrollment agreement.

- If a student withdraws prior to course completion, a calculation for return of funds will be completed and any applicable returns by the school shall be paid.
- After all applicable returns have been made, this refund policy will apply to determine the amount earned by the school and owed by the student.
- If the student has received personal payments of aid, he/she may be required to refund the aid to the applicable person/entity.
- If a Title IV financial aid recipient withdraws prior to course completion, a calculation for return of Title IV funds will be completed and any applicable returns by the school shall be paid, as applicable: first to unsubsidized Federal Student Loan Program; second to subsidized Federal Student Loan Program; third to Federal Pell Grant Program; fourth to other Federal, State, private or institutional student financial assistance programs; and last to the student.
- After all applicable returns to Title IV aid have been made, this refund policy will apply to determine the amount earned by the school and owed by the student.
- If the student has received personal payment of Title IV aid, he/she may be required to refund the aid to the applicable program. This calculation may take several days.

VA Guide to Receiving Veteran Educational Benefits at ADC

Step 1. Apply for Benefits.

You can accomplish this step in one of two ways:

- 1) You can call the VA directly at 888.442.4551 and speak to a benefits counselor to apply.
- 2) If you already know which benefit you would like to apply for, you can visit www.benefits.va.gov/gibil/apply.asp. From here, you can view eligibility criteria for all federal educational benefits offered. Simply click on any benefit that you would like to learn more about. If you are transferring your benefit to ADC, you can either transfer it online at:

www.ebenefits.va.gov/ebenefits or call the VA directly. Your benefit will not automatically transfer to ADC once you become an accepted student.

Step 2. Certificate of Eligibility.

Once you become eligible for an educational benefit, you will receive a "Certificate of Eligibility" letter in the mail. Please note that you will not receive this letter if you are eligible for chapter 31 benefits. Please email or drop off this letter to Tracy Swinarski, Financial Aid Director, for the Wallingford campus and Deb Plourde for the East Hartford campus, as proof of benefit eligibility. Your enrollment will not be certified to the VA without this letter unless you let the School Certifying Official know that you have applied and/or have transferred your benefit.

Step 3. Registration.

For your enrollment to be certified to the VA, you must be registered for classes for the semester. Non-matriculated students are not eligible for VA benefits unless an application is pending through the admissions office. If you are receiving benefits under chapter 31, please speak to your case manager about this policy.

Step 4. Certification.

Once you have registered and have turned in a "Certificate of Eligibility" form, your enrollment information will be submitted to the VA. Once submitted, please allow 3-4 weeks before payment is made by the VA.

Payments

While payment is pending to ADC from the VA, ADC will not:

- Prevent the student's enrollment;
- Assess a late penalty fee to;
- Require a student secure alternative or additional funding;

• Deny their access to any resources (access to classes) available to other students who have satisfied their tuition and fee bills to the institution Notwithstanding anything provided to the contrary, students must abide by the process provided above and at all such times make such payments which are NOT covered by a student's VA benefits.

STUDENT RULES AND REGULATIONS

Professionalism/Professional Behavior

To ensure the proper training environment for serious students, those students whose behavior disrupts the school in any way will be subject to either: being clocked out for the day OR disciplinary action (including suspension) and possible permanent dismissal. This includes not gossiping or spreading rumors about others, since this makes for an uncomfortable and unprofessional environment. Any inappropriate outburst, including verbally offensive or foul language, will not be tolerated.

In keeping with the rules of Professionalism and to protect the good nature of our school, students and faculty, the school's image, including the Academy Di Capelli logo, materials, and uniforms are not to be used in any manner outside of school related events, without the owner's written permission. This Catalog details behavior that will not be tolerated. Violations may result in disciplinary action or termination.

Violence and Harassment (Zero Tolerance Policy)

Academy Di Capelli adheres to a very strict zero tolerance rule regarding violence and sexual harassment. Any situations or actions that are in anyway determined as violent or sexually harassing towards a student, teacher, staff member, or customer will result in permanent termination from the school. Students engaging in verbal harassment will receive a written warning then at the next occurrence, be terminated. Sexually explicit conversation or using foul language on the salon floor or in the classroom, will receive a written warning. After the third written warning, the student will be expelled from the school. ADC will always maintain a comfortable and professional learning environment.

Student Standards of Conduct

- 1. **Dress Code:** All Students are required to wear the school uniform (shirt and apron/jacket provided by ADC) always. Students found to be out of dress code may not clock in until they are in dress code.
 - a. SHOES: shoes must be black for cosmetology & barber students and white for esthetic students. Shoes must be closed toe or professional looking boots (no combat boots, UGGS or slippers). Tall boots may have pants tucked into them or may be worn with a dress or skirt. Pant leg must be over ankle boots and cannot be tucked in. No sneakers or tennis style shoe allowed (unless specified with a doctor's note).
 - b. PANTS: pants and skirts must be clean, neat, solid black for cosmetology & barber students or solid white for esthetic students. Skirts must be at least knee length. Pants must be at least ankle length. No jean-like material, leggings, jeggings or yoga pants of any kind allowed. Pants must not have any "jean-like" back pockets with colored stitching or rivets.
 - c. SHIRTS: ADC shirts are provided and must not be altered in any way. The ADC logo, materials and uniforms are not to be used in any manner outside of school related events without the owner's written permission. Violations may result in disciplinary action or termination.
 - d. NO: sweatpants or sweatshirts of any such style or material; hoodies; hats; or sunglasses.
 - e. Students are expected to come to school well-groomed (hair/make-up already done).
 - f. Nails should be kept clean and no longer than sport length (esthetics students).
- 2. **Piercings/Tattoos:** Pierced ears are allowed; however, there is a limit of two of any other piercings or ornamentations on the face (studs only), no spikes, hoops, hanging or dangling jewelry of any kind. Student may be required to cover tattoos upon request.
- 3. **Preparedness:** Students are required to be mentally and physically prepared for class. Students are required to have all books and tools with them always. Students failing to do so may result in being sent home.
- 4. **Drug & Alcohol Policy:** The use or possession of alcohol or illegal drugs on school grounds is forbidden and will lead to termination. ADC staff has the right to dismiss any student who is suspected to be under the influence. ADC's complete Drug and Alcohol Abuse Prevention Policy can be found on the website: http://www.academydicapelli.com

- 5. **Smoking:** ADC is a smoke free school. This includes all electronic nicotine delivery systems, commonly referred to as vaping, e-cigarettes, e-cigars, etc. Electronic cigarettes pose health risks; they are not a safe alternative to smoking. Smoking is allowed outside, at the rear of the school, only. In addition, any other tobacco products such as chewing tobacco are not allowed.
- 6. Sanitation: Daily school sanitation must be done as assigned by the Clinic Instructor in addition to keeping your own work area clean. Failure to do assigned sanitation may lead to a suspension. School bags may be checked for sanitation of contents.
- 7. **Theft:** Students are responsible for reimbursement of any theft or damage done to the school while in attendance. The school is not responsible for theft of personal property or effects. Lockers are available upon request. Bags and lockers may be checked without prior notice. Theft of another student's property or school property may lead to termination and possible prosecution.
- 8. **Defamation:** Students should never talk about the school in a bad or defamatory manner, either to others or on online/social media platforms. This may result in immediate disciplinary action.
- 9. **Time Clock:** Students are responsible for swiping in/out with their timecard at the appropriate times (i.e.: arrival, lunch breaks, departure and any instances when leaving the facility during regularly scheduled school hours). Repeat failure to do so may lead to disciplinary action. Any student caught swiping a timecard other than their own will be suspended. Multiple infractions may lead to termination.
- 10. **Copyright Policy:** The unauthorized distribution of copyrighted material, including unauthorized peer-to-peer file sharing, may subject the student to civil and criminal liabilities. Penalties for violation of federal copyright laws range from a \$200 to \$150,000 fine for each work infringed. The infringer also pays for all attorney's fees and court cases. ADC prohibits unauthorized peer-to-peer file sharing, illegal downloading or unauthorized distribution of copyrighted materials. Any students found violating this policy may be subjected to disciplinary action up to termination.
- 11. **Cell Phone Use:** cell phones, headsets, earphones/earbuds or other such devices must be turned off and kept out of sight while clocked in unless on break. The school reserves the right to confiscate any cell phone or other such devise visible anywhere in the school.
- 12. ADC does not permit any recordings either audio or video of its school or classes without prior permission from administration.
- 13. **Eating:** Students may eat only in the designated areas of the school. Students may not eat or drink on the clinic floor or the mannequin room.
- 14. **Weapons**: The possession of any item that is, or resembles, a weapon on school grounds is prohibited and is grounds for termination.
- 15. **Behavior:** Students are expected to be courteous to fellow students, clients, and school staff always. Any unprofessional or rude conduct will result in a written warning and possible suspension.
- 16. **Cheating**: Any student caught cheating on a test, practical work or attempting to get credit for work done by another student will incur a three-day suspension.
- 17. Client Refusal: Any student refusing to perform a service on a client will be clock-out and sent home.

Students who violate any standards of conduct described in this catalog may be subject to written warnings, being dismissed for the day, suspension and/or termination.

This catalog/publication is true and correct in content and policy.