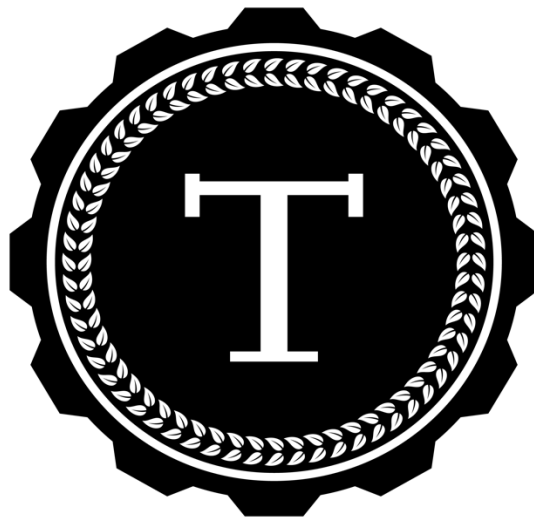


Turing School of Software & Design

1510 Blake Street Ste. LLE
Denver, CO 80202
(303) 731-3117



COURSE CATALOG

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Occupational School Board

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Introduction

The Turing School of Software & Design (hereinafter referred to as Turing) offers top quality training for students wanting to become professional software developers and designers. The school is a 501(c)3 non-profit operating in the state of Colorado under the direction of Jeff Casimir, Executive Director.

Board of Directors:

Ingrid Alongi
Chad Fowler
Dave Thomas
John Dowd
Kareem Grant
Randall Thomas
Roz Lemieux
Yong Bakos

Mission

Turing is on a social justice mission to open the world of programming to more great people. Our shared space is an opportunity to showcase the best of what we can be. It's an environment where all persons and opinions are welcome as long as their purpose is to build each other up, not tear each other down. In debate and action, we encourage opinions defended with rational discourse and respect that they are rooted in constructivist ideals. We carefully consider the effect our choices have on others, both inside and outside our group. Our intent, words, and action go beyond tolerance to acceptance: encouraging individuals to become the people they want to be.

Turing is not only a place where students learn about programming. In addition to instilling this knowledge, it is our intention to educate the individual student on matters related to the technology and software industry as a whole. In conjunction with our mission to increase opportunities for all individuals in the technology industry, we aim to educate our students to understand that mission and cultivate a wider understanding of what it means to be a programmer in today's society. In doing so, Turing incorporates discussions on larger issues, such as diversity, growth mindsets, and stress management and wellness, within its curriculum.

Back End Engineering Program

Turing offers a certificate in Back End Engineering with a focus on Web Application Development with Ruby and JavaScript. The program introduces the fundamental principles of Ruby Development through classroom instruction and practical experience with each other as well as professional mentors. In-class and in-world discussions and readings will introduce the student to important ideas and concepts that shape the field of computer science. In order to receive the certificate, students complete four six-week courses with a one week intermission between each course. During the intermission week no classes are held and students receiving assistance from certain government tuition payment programs may not be eligible for support during these one week intermission periods.

Courses

Object Oriented Programming with Ruby-Students will set up development environments, learn the basics of test-driven development with Ruby, learn to think in algorithms, explore debugging techniques, measure and improve test coverage, measure the performance of code, improve test speed, and gain practical experience working on an engineering team.

Web Application Development-Students will learn how the web works, build applications using the Sinatra Framework, be introduced to Ruby on Rails, learn effective Rails models, learn user authentication and authorization, use JavaScript outside a browser, and learn about sessions, cookies, and HTTP persistence.

Professional Rails Applications-Students will understand fundamental Rails security, learn to scale authentication and authorization strategies, implement background workers, build a Ruby Gem, design a software product, write a technical resume, learn technical interview strategies, and build a technical portfolio.

APIs and Scalability-Students will understand service oriented architecture, model data with EmberData, debug JavaScript Applications, understand JavaScript performance, generate large-scale example data, measure and improve query performance, simulate server traffic, encode and filter data, test APIs, experiment with 3rd party APIs, and access APIs from JavaScript.

Front-End Engineering Program

Turing offers a certificate in Front-End Engineering. Our front-end program provides the necessary skills to build a career in front-end development. From UX/UI principles to strong foundations on HTML, CSS, and JavaScript, our curriculum provides the framework and tools to build effective desktop, mobile and web applications. In-class and in-world discussions and readings will introduce the student to important ideas and concepts that shape the field of computer science. In order to receive the certificate,

students complete four six-week courses with a one week intermission between each course.

Courses

Fundamental Web Technologies

Students will learn the fundamentals of HTML, CSS, and JavaScript. They will use CSS to dynamically resize the page content to fit a wide variety of screen sizes—from small mobile devices to large desktop displays. Students will write their own grid layout system and add custom interactions using jQuery. Students will learn software engineering fundamentals like test-driven development and version control.

Web Development with JavaScript

Students will increase their knowledge of the language's mechanics and learn how to write object-oriented as well as functional JavaScript. Students will build a game from the ground up using HTML5 Canvas. Students will tackle the event loop and the fundamentals of writing asynchronous code. Finally, students will learn how to make their websites accessible to screen readers and other devices.

Professional Client-Side Development

Students will learn how to create and secure a JSON API in Express as well as persist data on the server. Students will learn how to leverage front-end frameworks like React and Ember to deliver ambitious client-side web applications that are not only feature-rich but stable and maintainable as well. This module covers routing, data persistence, authentication, authorization, testing, and building reusable components in both frameworks. Students will learn how to write automated tests to confirm that the applications function in each of the major browser platforms.

Desktop and Mobile Applications with Web Technologies

In the final module, students will build back-end servers using Node.js to power their client-side applications. Students will build applications with web technologies outside of the browser. They will build desktop applications with Electron, mobile web applications with PhoneGap and Cordova, and native applications with React Native. Students will work with cutting edge technologies like WebSockets, Web Components, and ServiceWorkers to create applications that update in real-time and work offline. Students will create rich, interactive data visualizations using D3 and HTML5 Media APIs such as the Web Audio API, WebGL for 3D-rendering, Geolocation API, and as well as pull in media from the user's camera and microphone.

Throughout each course, students will work collaboratively on an engineering team and have access to assistance from both instructors and experienced professional mentors.

Educational Services

At this time Turing does not offer any additional Educational Services.

Facilities

School activities take place at 1510 Blake Street Ste. LLE Denver CO 80202. This location serves as both instructional space for class sessions and workspace for students. The facility is accessible to students at least 16 hours per day, seven days per week.

Program Costs

- Full program tuition (four credits): \$20,000
- Additional single credits (if needed): \$2,500
- Equipment: \$0 (included in full tuition)
- Registration Fee: \$0
- Books & Supplies: \$0 - \$500, depending on student preferences

Entrance Requirements

Prospective students must have a high school diploma or equivalency diploma to be accepted for enrollment. If applicants are beyond the age of compulsory school attendance in Colorado and do not possess a diploma or equivalency diploma, they may complete an ability to benefit test. The school does not administer the test, but will provide information on availability when requested.

The application process includes an initial application and a follow-up interview. The initial application includes:

- Resume
- Writing sample
- Video Response
- Logic Challenge

The application interview will gauge the student's passion for programming and includes an aptitude exercise to measure the likelihood of success in a highly collaborative programming environment. Applications are accepted on a rolling basis with programs starting every seven weeks. Each course in the program runs for six weeks with a week off between courses. The entire program takes seven months to complete unless a student is required to repeat a class.

Enrollment

Courses will open for enrollment at least three months before the first day of the first course in the module. Prospective students may enroll anytime as long as they are in good standing, have completed any prerequisites, and there is space available in the course. Late enrollments will not be accepted. Upon invitation to the program students may enroll in any open level 1 course upon payment of a \$1,000 deposit. Unless otherwise agreed upon in writing, students are expected to attend the courses in the program in sequence.

Previous Credits / Advanced Placement

Any previous credits in a field of study being taught by Turing will be evaluated upon enrollment in the program. Students with pre-existing skills or training may elect to test out of any course in the program. The school maintains a written record of the previous education and training of all prospective students, veterans and eligible persons. The record clearly indicates that appropriate credit has been given for previous education and training, with the training period shortened proportionately. In the case of veterans or eligible persons, the Department of Veterans Affairs will be notified. Turing School of Software & Design does not guarantee transferability of our credits to any other institution.

Postponement of Start Date

Any postponement of a start date will require enrollment in a course that begins at a subsequent date. Students must be able to be in attendance on the first day of the start of any course and meet the attendance requirements thereafter. Postponement of a starting date, whether at the request of the school or the student, requires a written agreement signed by the student and the school. The agreement must set forth:

- Whether the postponement is for the convenience of the school or the student, and;
 - A deadline for the new start date, beyond which the start date will not be postponed.
- If the course is not commenced, or the student fails to attend by the new start date set forth in the agreement, the student will be entitled to an appropriate refund of prepaid tuition and any fees within 30 days of the deadline of the new start date set forth in the agreement, determined in accordance with the school's refund policy and all applicable laws and rules concerning the Private Occupational Education Act of 1981.

Class Schedule

Full-time students are expected to participate in structured school activities every weekday 8:30AM to 4:00PM with one hour for lunch. Throughout the four modules students attend a module for six weeks then have a one week intermission, during which no classes are held, before moving on to the next module. When an unexpected closure occurs due to extraordinary conditions such as inclement weather, students will be notified as soon as possible by email. Classes are not held on the following holidays:

- New Year's Eve
- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day & the following Friday
- Christmas Eve & Christmas Day

Placement Assistance

Turing School of Software & Design offers employment assistance to graduates, consisting of job lead referrals and job skills development. Students have the opportunity to receive individual assistance with resume drafting, job search resources, networking and interview skills from Turing's Professional Development Coordinator. While assisting in the job search, we cannot guarantee future employment. Current law prohibits any school from guaranteeing job placement as an inducement to enroll students.

Attendance Requirements

Students are expected to arrive on time for class with proper equipment and materials. Students arriving late for any reason shall not be allowed entry to that day's class at the instructor's discretion. Tardiness will be recorded as an absence even if a student is allowed into class. An overall attendance rate of at least 90% is required to pass a course. Instructors may request that a student withdraw from a course or program if absences exceed 20% at any point during a course. Students who are unable to continue any course for medical reasons or severe personal problems will be required to take a leave of absence until they are able to return to the program. Proper documentation will be required to substantiate a student's withdrawal.

Progress Policy

Students must attain a passing score on the final portfolio for a course and satisfy the attendance expectations to progress to the next course. A passing score on the final

portfolio of the final course in the program in addition to meeting attendance expectations qualify a student for graduation. A student who does not pass the portfolio review for a given class or fails to meet attendance expectations can choose to repeat the course, consuming an additional credit of their tuition. This second attempt constitutes a probationary period. A student passing the course on the second attempt is restored to good standing and promoted to the following course. Students who fail the same class twice may be excused from the program.

Grading System

- 4 - Exceeds Expectations
- 3 - Meets Expectations
- 2 - Below Expectations
- 1 - Far Below Expectations

Students will do a variety of group and individual projects each module. Students will receive a number grade based on their performance and the grading rubric explained at the beginning of each project. At the end of each course, each student will be required to put together a portfolio that includes their work during the course. Instructors will review each portfolio and give students a grade based on the skills demonstrated throughout the course. A final portfolio and exam will be given at the end of the program and must be passed in order to graduate.

Conduct Policy

All members of the School community including students, faculty members, and members of the staff—shall comply with city, state, and federal laws and ordinances affecting the maintenance of order on School premises. In addition, students must abide by the Conduct Policy Provisions in order to maintain good academic standing. This maintenance of order includes but is not limited to:

- Maintaining a safe environment
- Respecting all members of the Turing community
- Respecting property of all members of the Turing community, including intellectual property
- Respecting and maintaining Turing's facility
- Participating in classes, discussions, and group work with a respectful attitude and language
- Arriving to classes on time and in a manner that does not distract other students or instructor
- Not violating the harassment policy

Behavior that is in violation of any of the above guidelines may result in disciplinary action.

No Tolerance Policies

Academic Dishonesty

At Turing, we teach our students to take agency of their learning as well as collaboration with others. We expect integrity from our students, and as such, presenting someone else's work as one's own will not be tolerated.

If staff suspects that a student may have cheated on an assignment or project, a disciplinary meeting will be held to determine the validity of the cheating claim. If a student is found to have cheated, he/she will be immediately dismissed from Turing.

Disciplinary Action

Disciplinary action may be taken against a student if he or she is found to have violated expectations set forth to maintain a safe, respectful, and productive environment.

Violations may include but are not limited to:

- Interfering with or disrupting the regular operations and activities of Turing
- Injury to Turing's property, real or intellectual
- Unauthorized access to or occupation of nonpublic areas on Turing's premises, including but not limited to classrooms, seminar rooms, laboratories, libraries, faculty and administrative offices, and storage areas.
- Unauthorized access to or use of personal property, including files and records
- Any violation of Turing's Harassment or Discrimination Policy

In most cases, disciplinary action will begin with a meeting to discuss a Performance Improvement Plan. It is mandatory for students to complete their Performance Improvement Plans in order to return to good standing.

Performance Improvement Plans (PIPs)

- A student may be put on a Performance Improvement Plan if staff members notice a pattern of behavior that is distracting or harmful to Turing's environment or if student performance/attendance is lacking. Staff members will develop the PIP and meet with the student separately to discuss its goals and deadlines
- If a student is found to not complete his/her PIP in a satisfactory manner, the student may be temporarily suspended until the PIP is completed

The Executive Director may temporarily suspend students whose conduct is disruptive or unacceptable to the academic setting. After appropriate counseling, students who demonstrate a genuine desire to learn and conform to school standards of conduct, may be allowed to resume attendance.

Student Complaint Procedure

We strongly encourage students to come to staff members to resolve any issue with Turing. Complaints regarding other students or staff can be made directly to the Student Experience Manager or any other staff member who will appropriately deal with the situation. At the students option, a complaint can be brought in writing to the attention

of the Division of Private Occupational Schools at <http://highered.colorado.gov/dpos/> or by phone at (303) 862-3001. There is a two-year statute of limitations for the Division to take action on a student complaint.

IN THE EVENT THAT A STUDENT'S CONDUCT RISES TO THE LEVEL OF HARASSMENT OR DISCRIMINATION, OR ANY STUDENT WISHES TO FILE SUCH CLAIM OR SUCH A CLAIM IS FILED AGAINST A STUDENT, SUCH SITUATION SHALL BE DEALT WITH IN ACCORDANCE WITH THE HARRASSMENT POLICY SET FORTH IN THIS CATALOG.

Student Dismissal

Any student may be dismissed for violations of rules and regulations of the school, as set forth in this Code of Conduct. A student may also be withdrawn from classes for misrepresentation or dishonesty in completing assignments (see No Tolerance Policies) or if he or she does not prepare sufficiently, neglects assignments, or makes unsatisfactory progress. Any violation of Turing policies may result in permanent dismissal from the program. The Executive Director, after consultation with the involved parties, makes all final dismissal decisions. The Executive Director may temporarily suspend students whose conduct is disruptive or unacceptable to the academic setting. After appropriate counseling, students who demonstrate a genuine desire to learn and conform to school standards of conduct, may be allowed to resume attendance.

Harassment Policy

Turing strives to create and maintain an environment in which people are treated with dignity, decency and respect. The environment of the school should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Students should be able to work and learn in a safe, yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of the school. For that reason, Turing will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of students as well as employees the school will seek to prevent, correct and discipline behavior that violates this policy. All students and employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee or student who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

Prohibited Conduct Under This Policy

Turing, in compliance with all applicable federal, state and local anti-discrimination and harassment laws and regulations, enforces this policy in accordance with the following definitions and guidelines:

Discrimination

It is a violation of Turing's policy to discriminate in the provision of learning opportunities, benefits or privileges; to create discriminatory learning conditions; or to use discriminatory evaluative standards in admissions or grading if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status.

Discrimination of this kind may also be strictly prohibited by a variety of federal, state and local laws, including Title VII of the Civil Rights Act 1964, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990. This policy is intended to comply with the prohibitions stated in these anti-discrimination laws.

Discrimination in violation of this policy will be subject to disciplinary measures up to and including expulsion.

Harassment

Turing prohibits harassment, including sexual harassment, of any kind, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct, whether in person or via digital expressions in Turing forums designed to threaten, intimidate or coerce a student, employee, alumni or any person working for or on behalf of Turing. Verbal taunting (including racial and ethnic slurs) that, in the students, employees, alumni or other Turing affiliate's opinion, impairs his or her ability to perform his or her job or impairs the constructive learning environment is included in the definition of harassment.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal harassment includes comments that are offensive or unwelcome regarding a person's nationality, origin, race, color, religion, gender, sexual orientation, age, body, disability or appearance, including epithets, slurs and negative stereotyping.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, disability, sexual identity, marital or other protected status.

Sexual harassment

Sexual harassment is a form of unlawful employment discrimination under Title VII of the Civil Rights Act of 1964. According to the Equal Employment Opportunity Commission (EEOC), sexual harassment is defined as "unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature . . . when . . . submission to or rejection of such conduct is used as the basis for employment decisions . . . or such conduct has the purpose or effect of . . . creating an intimidating, hostile or offensive working environment. Turing uses the standards set forth in Title VII regarding sexual harassment as a guideline for its

treatment of sexual harassment claims concerning employees and students. In addition to any guidelines for employees, reciprocal guidelines are applicable to all students. Any creation of a hostile learning environment or use of sexual harassment as a basis for granting academic opportunities is strictly prohibited.

There are two types of sexual harassment:

- “Quid pro quo” harassment, where submission to harassment is used as the basis for employment decisions. Employee benefits such as raises, promotions and better working hours are directly linked to compliance with sexual advances.

The student corollary would be assignments, financial incentives or academic progress linked to compliance with sexual advances. Therefore, only someone in a supervisory capacity (with the authority to grant such benefits) can engage in quid pro quo harassment. Examples: A supervisor promising an employee a raise if she goes on a date with him; a manager telling an employee she will fire him if he does not have sex with her.

- “Hostile work environment,” where the harassment creates an offensive and unpleasant learning environment. A hostile learning environment can be created by anyone in the school environment, whether it be supervisors, other employees, students, alumni, mentors or authorized representatives. Hostile environment harassment consists of verbiage of a sexual nature, unwelcome sexual materials or even unwelcome physical contact as a regular part of the work environment. Texts, e-mails, cartoons or posters of a sexual nature; vulgar or lewd comments or jokes; or unwanted touching or fondling all fall into this category.

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature:

- Is made explicitly or implicitly a term or condition of employment or academic benefits.
- Is used as a basis for an employment or educational advancement decision.
- Unreasonably interferes with an employee’s or students work or academic performance or creates an intimidating, hostile or otherwise offensive environment.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this policy:

- Verbal sexual harassment includes innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks and threats; requests for any type of sexual favor (this includes repeated, unwelcome requests for dates); and verbal abuse or “kidding” that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome.

- Nonverbal sexual harassment includes the distribution, display or discussion of any written or graphic material, including calendars, posters and cartoons that are sexually suggestive or show hostility toward an individual or group because of sex; suggestive or insulting sounds; leering; staring; whistling; obscene gestures; content in letters and notes, facsimiles, e-mail, photos, text messages, tweets and Internet postings; or other form of communication that is sexual in nature and offensive.

- Physical sexual harassment includes unwelcome, unwanted physical

contact, including touching, tickling, pinching, patting, brushing up against, hugging, cornering, kissing and fondling and forced sexual intercourse or assault.

Courteous, mutually respectful, pleasant, noncoercive interactions between employees and students, including men and women, that are appropriate in the school and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.

Retaliation

No hardship, loss, benefit or penalty may be imposed on a student in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Retaliation or attempted retaliation in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including expulsion from Turing or termination of employment as the case may be.

Complaint Process

Turing will courteously treat any person who invokes this complaint procedure, and the company will handle all complaints swiftly and confidentially to the extent possible in light of the need to take appropriate corrective action. Lodging a complaint will in no way be used against the student or have an adverse impact on the individual's academic status. Because of the damaging nature of harassment to the victims and to the entire school, aggrieved students are strongly urged to use this procedure. However, filing groundless or malicious complaints is an abuse of this policy and will be treated as a violation.

Confidentiality

Individuals wishing to discuss an incident confidentially or seeking information and advice of a personal nature are encouraged to contact any member of the Turing staff. Contacting a staff member will not qualify as notification to Turing of a potential harassment or discrimination issue however it will give the student the opportunity to discuss the situation and possible actions that can be taken in order to address the situation. (see below complaint procedure for more on how to notify the company of an issue or complaint).

During the complaint process, the confidentiality of the information received, the privacy of the individuals involved and the wishes of the complaining person will be protected to as great a degree as is legally possible. The expressed wishes of the complaining person for confidentiality will be considered in the context of the school's legal obligation to act on the charge and the right of the charged party to obtain information. In most cases, however, confidentiality will be strictly maintained by the company and those involved in the investigation. In addition, any notes or documents written by or received

by the person(s) conducting the investigation will be kept confidential to the extent possible and according to any existing state or federal law.

Complaint Procedure

Turing has established the following procedure for lodging a complaint of harassment, discrimination or retaliation. The company will treat all aspects of the procedure confidentially to the extent reasonably possible.

- 1 An individual who feels harassed, discriminated or retaliated against may initiate the complaint process by filing a complaint in writing with Turing's General Counsel. No formal action will be taken against any person under this policy unless the General Counsel has received a written complaint containing sufficient details to determine if the policy may have been violated. The complaining student may submit this writing via email at rmartinez@turing.io or in person to Rachel Martinez or via regular mail at the schools address, attention Rachel Martinez. If a supervisor or manager becomes aware that harassment or discrimination is occurring, either from personal observation or as a result of a student's coming forward, the supervisor or manager should immediately report it to the General Counsel in writing.
- 2 Upon receiving a complaint or being advised by a supervisor or manager that violation of this policy may be occurring, the General Counsel will review the complaint and contact the Executive Director or a member of the Board of Directors depending on the individuals involved.
- 3 Within five business days of receiving the complaint, the General Counsel will notify the person(s) charged [hereafter referred to as "respondent(s)"] of a complaint and initiate the investigation to determine whether there is a reasonable basis for believing that the alleged violation of this policy occurred.
- 4 During the investigation, the General Counsel, together with the Executive Director or other management employees, or a member of the Board of Directors, as may be appropriate, will interview the complainant, the respondent and any witnesses to determine whether the alleged conduct occurred.
- 5 Within 15 business days of the complaint being filed (or the matter being referred to the General Counsel), the General Counsel or other person conducting the investigation will conclude the investigation and submit a written report of his or her findings to the school Executive Director and members of the Board of Directors.
- 6 If it is determined that harassment or discrimination in violation of this policy has occurred, the General Counsel will recommend appropriate disciplinary action. The appropriate action will depend on the following factors: a) the severity, frequency and pervasiveness 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., first-hand 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, the General Counsel may recommend appropriate preventive action.
- 8 Within five days after the investigation is concluded, the General Counsel will meet with the complainant and the respondent separately, notify them of the findings of the investigation, and inform them of the action being recommended.
- 9 The complainant and the respondent may submit statements to the General Counsel challenging the factual basis of the findings. Any such statement must be submitted no later than five business days after the meeting with General Counsel in which the findings of the investigation are discussed.
- 10 Within 10 business days from the date the General Counsel meets with the complainant and respondent, members of the Board of Directors will review the investigative report and any statements submitted by the complainant or respondent, discuss results of the investigation with the General Counsel, Executive Director and other management staff as may be appropriate, and decide what action, if any, will be taken. The General Counsel will report the school's decision to the complainant, the respondent and the appropriate staff assigned to the cohort in which the complainant and the respondent are enrolled in. The company's decision will be in writing and will include findings of fact and a statement for or against disciplinary action. If disciplinary action is to be taken, the respondent will be informed of the nature of the discipline and how it will be executed.
- 11 In the event the complaint involves a physical violation that is against any local, state or federal criminal code the proper authorities shall be contacted. Any student receiving a complaint of this nature against them will be required to complete all school assignments remotely from an off campus location effective immediately following any such complaint until further notice. Pending the results of a police investigation, the General Counsel, in conjunction with the Executive Director, members of the Board of Directors, and other management staff as appropriate will determine a course of action that is in the best interest of, and for the protection of the school's students.

Alternative legal remedies

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.

Cancellation & Refund Policy

1. The Student will receive a full refund of all fees and tuition paid if:
 - a. The Student requests cancellation in writing within three business days of signing an enrollment agreement, providing the Student has not commenced training.
 - b. The Student is not accepted for training by school.
 - c. The School discontinues a course/program within a period of time a student could have reasonably completed it, except that this provision shall not apply in the event the School ceases operation.
2. Student requesting cancellation after three business days of signing an enrollment agreement, but before entering the Program, shall be entitled to a refund of all monies paid minus a \$150.00 cancellation fee.
3. If a Student withdraws or is dismissed after entering school and after three business days of signing an enrollment agreement, the school will retain a cancellation fee of \$150.00 plus a Pro Rata percentage of tuition and fees, which is based on the percentage of contact hours attended, as described in the table below. The refund is based on the last date of recorded attendance.

Completion of course upon termination	Refund
10% of program completed	90% Refunded
20% of program completed	80% Refunded
30% of program completed	70% Refunded
40% of program completed	60% Refunded
50% of program completed	50% Refunded
60% of program completed	40% Refunded
70% of program completed	30% Refunded
80% of program completed	20% Refunded
90% of program completed	10% Refunded

- a. For any student electing the Up-Front Option of payment the student will be entitled to a Pro rata reimbursement. The number of completed days shall be determined according to the number of days in the program that have lapsed from the first day of the Program till students' last date of recorded attendance.
- b. For a student who is electing a Deferment option, the student will be entitled to a refund based on a Pro rata Reimbursement. This percentage shall be determined by dividing the number of completed days by the total number of class days in the program. The number of

completed days shall be determined according to the number of days in the program that have lapsed from the first day of the Program till the last date of recorded attendance. The student shall be entitled to a refund if the amount paid is greater than the refund owed based on the Pro-rata calculation of money owed based on the percentage of the program completed. Otherwise, student shall be liable to pay any remaining cost of the Program based on the deferment option elected and the percentage of the Program completed.

- c. Any student receiving funds from a third party lending source will receive any refund due as calculated on a pro rata basis in accordance with Turing policy, however money will be refunded to either the student or the lending partner in accordance with any applicable agreement with the lending source, which may require direct repayment to the lender as opposed to the student.
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- 4. The official date of termination for refund purposes is the last date of recorded attendance. All refunds made will be made within 30 days from the date of termination.
 - 5. The student may cancel their enrollment at any time prior to close of the third business day after signing the Enrollment Agreement.
 - 6. The policy for granting credit for previous training shall not impact this refund policy.
 - 7. Complaints, which cannot be resolved by direct negotiation between the student and the school, may be filed with the Division of Private Occupational Schools of the Colorado Department of Higher Education. The Division shall not consider any claim that is filed more than two years after the date the student discontinues his/her training at the school.