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| Policy Number | Policy Title |
|---|---|
| 11000.01 | Catastrophic Events Policy for Online Courses |

**Contacts and Dates**

| Responsible Office | Policy Owner |
|---|---|
| Office of Digital Learning Initiatives | eSpelman & CIO |

| Effective Date | Last Updated | Next Review |
|---|---|---|
| 05/06/2026 | 05/06/2026 | 07/01/2027 |

**Policy Description**

**Policy**

This policy establishes Spelman College's Office for Digital Learning Initiatives' (ODLI) framework for maintaining operational continuity of online education programs in the event of a catastrophic, disruptive, or emergency event. It fulfills the institution's obligations under the National Council for State Authorization Reciprocity Agreements (NC SARA) Policy Manual, which requires member institutions to ensure that students receive the educational services for which they have paid or, if such services cannot be delivered, receive reasonable financial compensation. It further establishes procedures for protecting and maintaining student records in the event of institutional closure.

ODLI, through eSpelman, primarily serves non-traditional learners, including working adults, career changers, and lifelong learners. These learners are not the traditional, undergraduate, residential campus students. This policy applies to all learners enrolled in online and distance education courses offered by the Office of Digital Learning Initiatives.

Policy Details

## 1. Continuity of Online Instruction

### 1.1 Guiding Principles

Because ODLI serves non-traditional, adult learners through fully online modalities, the institution maintains a particular responsibility to ensure that course interruptions are minimized. Students in these programs often have significant work, family, and financial obligations, and disruption to their academic progress can have serious personal and professional consequences. The institution's response to any catastrophic event will be guided by:

- Preservation of instructional continuity to the greatest extent practicable
- Transparent and timely communication with students, faculty, and staff

- Equitable treatment of all affected students regardless of location or circumstance • Full compliance with NC SARA student protection requirements

### 1.2 Technology and Infrastructure Redundancy

The institution maintains the following redundancies to support uninterrupted online education:

- Primary LMS, Canvas, is hosted on a cloud-based platform with service-level agreements guaranteeing 99.9% uptime annually and disaster recovery provisions.
- Backup communication channels, including institutional email, SMS text alerts, and publicly accessible emergency web pages.
- Offsite and cloud-based backup of all course materials, syllabi, grade records, and student data are updated nightly.
- Documented agreements with technology vendors specifying continuity of service obligations.
- Emergency IT response team with designated personnel and escalation procedures

### 1.3 Instructional Interruptions

In the event of a disruption to online instructional delivery, the following tiered response will be implemented:

| Tier | Duration | Institutional Response |
|---|---|---|
| **1 Minor** | 1–3 days | Faculty notified; alternative contact methods activated; deadline extensions issued as needed; no calendar adjustment required. |
| **2 Moderate** | 4–14 days | Academic calendar reviewed; coursework timeline adjusted or extended; affected modules rescheduled; students individually notified with revised course plans. |
| **3 Severe** | 15+ days or mid-term | AVP, SVP, and Academic Affairs convened; term suspension, course restart, or teach-out options evaluated; SARA home state notified per applicable requirements. |

The online program director is expected to maintain updated, accessible copies of all course materials and syllabi on the ODLI Microsoft TeamSite and/or Canvas to enable rapid course restoration. Instructors will receive emergency teaching protocol guidance through the ODLI.

## 2. NC SARA Student Protection Requirements

### 2.1 Delivery of Services Paid For

In accordance with NC SARA Policy, if a catastrophic event prevents the institution from delivering educational services for which students have paid tuition and fees, the institution will take one or more of the following actions:

- Resume and complete the interrupted courses as soon as reasonably practicable, with appropriate accommodation for affected students
- Offer students the ability to complete coursework in an alternative format or accelerated timeline.
- Grant Incomplete (I) grades with an extended completion period where coursework can be made up after the disruption ends
- Provide teach-out options for students participating in online programs
- Provide a full or prorated refund of tuition for services not delivered, in accordance with the institution's refund policy and any applicable state or federal requirements The Registrar's Office and Business Office will coordinate to calculate appropriate refunds or academic credits within 30 days of any declared institutional disruption. No student will be financially penalized for circumstances outside their control resulting from a catastrophic event.

### 2.2 Financial Compensation Procedure

Should the institution be unable to deliver services and a refund is warranted, the following process will apply:

- The Chief Financial Officer (CFO) and Associate Vice President (AVP) will jointly assess the scope of undelivered services within 10 business days of the event determination
- Students will receive written notification of their options (service continuation or financial compensation) within 15 business days
- Refunds will be processed within 30 days of a student's election

## 3. Student Records: Protection and Maintenance

### 3.1 Records Preservation Standards

The protection and long-term accessibility of student academic records is a paramount institutional obligation. Spelman College maintains student records in compliance with the Family Educational Rights and Privacy Act (FERPA), state law, accreditation standards, and NC SARA policy requirements. In the event of a catastrophic event or closure, the institution will ensure:

- All official academic records (transcripts, degree audits, enrollment verifications) are maintained in a secure, offsite or cloud-based repository
- Current backups of all student records exist at a geographic location separate from primary institutional servers.

- Records are preserved for a minimum of 10 years post-closure, or as required by applicable law, whichever is longer.

### 3.2 Records Custodian and Transfer

The Registrar serves as the institution's primary Records Custodian. In the event of institutional closure, the following steps will be taken:

- The Registrar will coordinate the secure transfer of all official academic records to a designated records repository, if applicable.
- Students will be notified of where their records will be maintained and how to request transcripts or verifications following closure
- A forwarding contact (email and mailing address) will remain active for a minimum of 3 years post-closure for records requests
- The institution will publish information about record access on its website for a minimum of 5 years following closure.

### 3.3 Digital Record Security

- Encryption of data at rest and in transit using current industry-standard protocols
- Role-based access controls ensuring only authorized personnel can access or modify student records
- Automated, redundant backups to geographically distributed cloud storage
- Annual security audits and vulnerability assessments of records systems
- Incident response plan specific to student data breaches, including notification procedures under FERPA and applicable state breach notification laws

## 4. Communication Protocols

Timely communication is essential to minimize harm to students during any catastrophic event. The institution's communication plan includes:

- A designated Emergency Communication Officer
- Pre-established messaging templates for common disruption scenarios, updated annually
- Multi-channel notification (institutional email, student portal alerts, SMS/text, social media, and institutional website emergency banner)
- A dedicated FAQ page or emergency webpage maintained throughout any disruption period
- Clear information about academic options, timelines, and student rights in all emergency communications
- Separate communications targeting faculty/staff and students to ensure role appropriate guidance

## 5. Roles and Responsibilities

| Role | Primary Responsibility Under this Policy |
|---|---|
| Associate Vice President | Oversees continuity of instruction; approves academic calendar adjustments |
| Chief Financial Officer | Manages refund processes; ensures financial compensation. |
| Registrar | Maintains and transfers student records; manages records and custodian obligations; provides transcript access post-closure. |
| Chief Information Officer | Ensures technology redundancy and recovery; oversees data backup and security; leads cyber incident response. |

## 6. Policy Review and Testing

This policy will be reviewed annually by the Office of Digital Learning Initiatives in collaboration with the Office of the Registrar and Information Technology. The review will include:

- An assessment of any changes to NC SARA policy requirements
- A review of any disruptions or near-disruptions experienced during the preceding year and lessons learned
- Verification that records backup systems are functioning and that restore procedures have been tested

Material revisions to this policy require approval by the ODLI governing body.

## Definitions

For purposes of this policy, a "catastrophic event" includes, but is not limited to, any occurrence that substantially disrupts or threatens the institution's ability to deliver online instruction or administrative services, such as:

- Natural disasters (e.g., hurricane, tornado, flood, ice storm, earthquake)
- Widespread technology or infrastructure failure, including loss of learning management system (LMS) access or internet connectivity
- Cyber incidents, ransomware attacks, or significant data breaches
- Pandemic, public health emergency, or government-mandated closure
- Loss of accreditation or authorization to operate
- Financial exigency leading to potential or actual institutional closure
- Fire, structural damage, or physical destruction of critical facilities
- Significant loss of key personnel or leadership

## To Whom Policy Applies

To whom and/or what the policy applies; lists groups who must know and adhere to the policy

☒ All College (Faculty, Staff, Students, Trustees, ☒ Divisional ☒

| | |
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| Contractors [unless otherwise negotiated]) | Unit/Department Specific |

**External Regulation (if applicable)**

National Council for State Authorization Reciprocity Agreements (NC-SARA)
Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

**Tags**

**Implementation**

**Procedures**

**Monitoring**

Associate Vice President, Digital Learning Initiatives

**Exceptions/Exclusions (If applicable)**

N/A

**Background and History**

**Administrator Access (Policy Owner)**

**Review, Approval, and Change History: Policy is required to be reviewed annually**

| **Date** (MM-DD-YYYY) | **Reviewed by Policy Owner** | **Brief Description of Change** (if applicable) | **Change Approved by** (title, not name) |
|---|---|---|---|
| 05-06-26 | ☒ | Written to reflect NC-SARA new requirements. | AVP, eSpelman |
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