

NUMBERED MEMO CC24-047 (SUPERSEDED BY CC24-048)

TO: Presidents

FROM: Dr. Brian S. Merritt
Senior Vice President and Chief Academic Officer

SUBJECT: Guidance in Response to Hurricane Helene Recovery Efforts

DATE: October 9, 2024

Our thoughts remain with the North Carolina communities devastated by Hurricane Helene, including many within our NC community college family—students, faculty, and staff. We want you to know that our hearts are with you during this difficult time. While those of us who were less directly impacted cannot fully comprehend the scale of the challenges you are facing, we are actively working to address your concerns and questions. Below, you will find initial guidance to support colleges and students.

The following definitions apply to the guidance:

- a. “Impacted college” is defined as a college located in a county declared a major disaster by the President of the United States under the Stafford Act (P.L. 93-288) due to Hurricane Helene.
- b. “Impacted student” is defined as a student meeting at least one of the following criteria: (1) The student was enrolled at an impacted college as of September 26, 2024. (2) The student resided, as of September 26, 2024, temporarily or permanently, in a county declared a major disaster by the President of the United States under the Stafford Act (P.L. 93-288) due to Hurricane Helene.

1. Emergency Withdrawals & Incomplete Grades:

If they do not still exist in your local policies, impacted colleges should reintroduce two grades to their local curriculum grading schemes:

- a. IE – Incomplete Emergency, and
- b. WE – Withdraw Emergency.

The IE and WE grades should be applied to impacted students’ records in response to withdrawals and incomplete grades that are a direct result of the Hurricane Helene disaster. For the IE grade, it is recommended that colleges review their incomplete grade policy to evaluate if enough time will be available for students to complete the learning outcomes of the course. Colleges may consider increasing the available time given to complete the course due to the unique nature of this natural disaster.

Impacted students enrolled at impacted colleges who use the Career and College Promise Program (CCP) tuition waiver should be served under the same rules. As such, dually enrolled students can be

assigned an IE or WE grade aligned with the guidance above.

Proper documentation of withdrawals and incomplete grades due to this emergency will be important for purposes such as Satisfactory Academic Progress (SAP) appeals, academic appeals, and other reasons that help us holistically and consistently serve students across our state.

2. Tuition & Title IV Financial Aid Implications

- a. **Tuition and Fees:** Under existing rules, the System Office does not have the authority to allow colleges to fully refund tuition/fees for impacted students not completing due to circumstances associated with Hurricane Helene. We encourage colleges to assist impacted students by providing the option for an Emergency Withdrawal or Emergency Incomplete. The option for applying paid tuition to future terms may be available through future waivers, and emergency funding may become available. The “WE” and “IE” grades would be critical for these purposes.
- b. **Student transfer to other institutions:** 34 CFR 668.5 permits colleges to establish a written agreement with another institution. This agreement allows the impacted student to continue their academic program at the other institution while receiving Title IV financial aid. A consortium agreement template is provided along with this memo.
- c. **Satisfactory Academic Progress:** If an impacted student fails to meet satisfactory academic progress (SAP) standards due to a disaster, the institution may use the exception provided in 34 CFR 668.34(a)(9) to find that because of “other special circumstances,” the impacted student is meeting standards. The institution must document in the student's file that the student failed to maintain satisfactory academic progress due to a disaster. The consideration of the “WE” and “IE” grades noted above will be key to considering SAP appeals.
- d. **Return of Title IV funds (R2T4) Calculations:** Even in the event of a disaster, colleges must follow their withdrawal process(es) and perform the R2T4 calculations in accordance with institutional policies and the Dept. of Education's regulations on R2T4 funds. This is particularly important for a student who received loans for that period. Tuition assistance is being pursued to help offset impacted students’ balances due to R2T4.
- e. Additional Financial Aid guidance for major disasters is available in the following documents.
 - i. FA Disaster Guidance:
<https://fsapartners.ed.gov/sites/default/files/attachments/dpccletters/GEN1708.pdf>
 - ii. FA Disaster Guidance Attachment:
<https://fsapartners.ed.gov/sites/default/files/attachments/dpccletters/GEN1708Attachment.docx>
 - iii. R2T4: <https://fsapartners.ed.gov/knowledge-center/fsa-handbook/2024-2025/vol5/ch1-general-requirements-withdrawals-and-return-title-iv-funds>.

3. Instructional Time Make-Up

- a. *Curriculum & Continuing Education Programs*: As impacted colleges consider processes for making up missed instructional and clinical time, please make the most appropriate academic decision that follows your college's alternate instruction policy, while ensuring that program and student learning outcomes are met. See 1G SBCCC 200.1 (c) for the full policy. Please note that all regulatory agencies may not allow the same flexibility—it will be important to defer to their required standards when applicable. Your process may include any of the following:
 - i. Alternate instruction
 - ii. Online learning/Hybrid/Multi-modal
 - iii. Additional time added to each scheduled class
 - iv. Cancellation of scheduled breaks
 - v. Additional Days added to the end of the semester
 - vi. Emergency incomplete awarded (to be completed according to college policy)

Impacted colleges may implement simulation-based training as an acceptable alternative to traditional clinical practice, contingent on the approval of state and national regulatory or accrediting agencies.

CE and CU courses cannot use instructional packets for make-up time but may use project-based learning if aligned with program objectives and outcomes. Please note that homework assignments shall not be reported for budget/FTE purposes (see 1G SBCCC 200.95(a)). Project-based learning (PBL) should not be considered homework; instead, it serves as an alternative assignment to make up for missed class time.

Project-Based Learning (PBL) is an instructional approach where students actively explore real-world problems or complex questions over an extended period. Through research, collaboration, and critical thinking, students create a final product or presentation that demonstrates their understanding and skills.

In a correctional education setting, a college may make up instructional time by issuing evening and weekend assignments and documenting students' successful completion of the assignments. The college must maintain documentation of how instruction was rescheduled or otherwise made up until it is released from all compliance reviews.

- b. *College & Career Readiness (Basic Skills)*: As impacted colleges consider processes for making up missed instructional time in College and Career Readiness coursework, please make the most appropriate academic decisions that are consistent to your institution's alternate instruction policy, while ensuring that program and student learning outcomes are met. See 1G SBCCC 200.95 for the full policy.

Your process may include any and/or all the following:

- i. HSE in The Community Learning Packets
- ii. Alternative Learning Packets (approved in 2020)
- iii. Online learning/Hybrid/Multi-modal
- iv. Emergency incomplete grading awarded (to be completed according to college policy) for graded courses to include Adult High Schools Courses, BSP-4002 Transition English, and BSP-

4003 Transition English.

4. **Work-Based Learning:**

The elements of work-based learning (WBL) courses are outlined in 1D SBCCC 400.10(6)(A-D). Given the limitation of available WBL placement opportunities for students due to the impact of Hurricane Helene, chief academic officers at impacted colleges may approve a course substitution or waive the course requirement, as appropriate, for a work-based learning (WBL) course in an impacted student's program of study. Course substitutions and/or waivers should be made on an individual basis for students who are unable to complete WBL course requirements during the 2024-2025 academic year through the summer 2025 term. The decision to substitute or waive the WBL course requirement must be based on the academic soundness of the decision and include documentation of the rationale including a signed substitution/waiver form in accordance with the local college's policy. This temporary guidance applies to work-based learning (WBL) courses listed as core courses within a curriculum standard and/or WBL courses listed as other required courses in the approved program of study

CC: Chief Academic Officers
Student Development Administrators