

NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

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2024 NCCCS Compliance Services Regional Training Check-In

NC COMMUNITY
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Compliance Services

CCR and CE Regional Training 2024

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Compliance Examiners



Agenda

Overview of Compliance Services

Compliance Review Process

Areas of Review

Top Compliance Issues

Open Forum for Questions

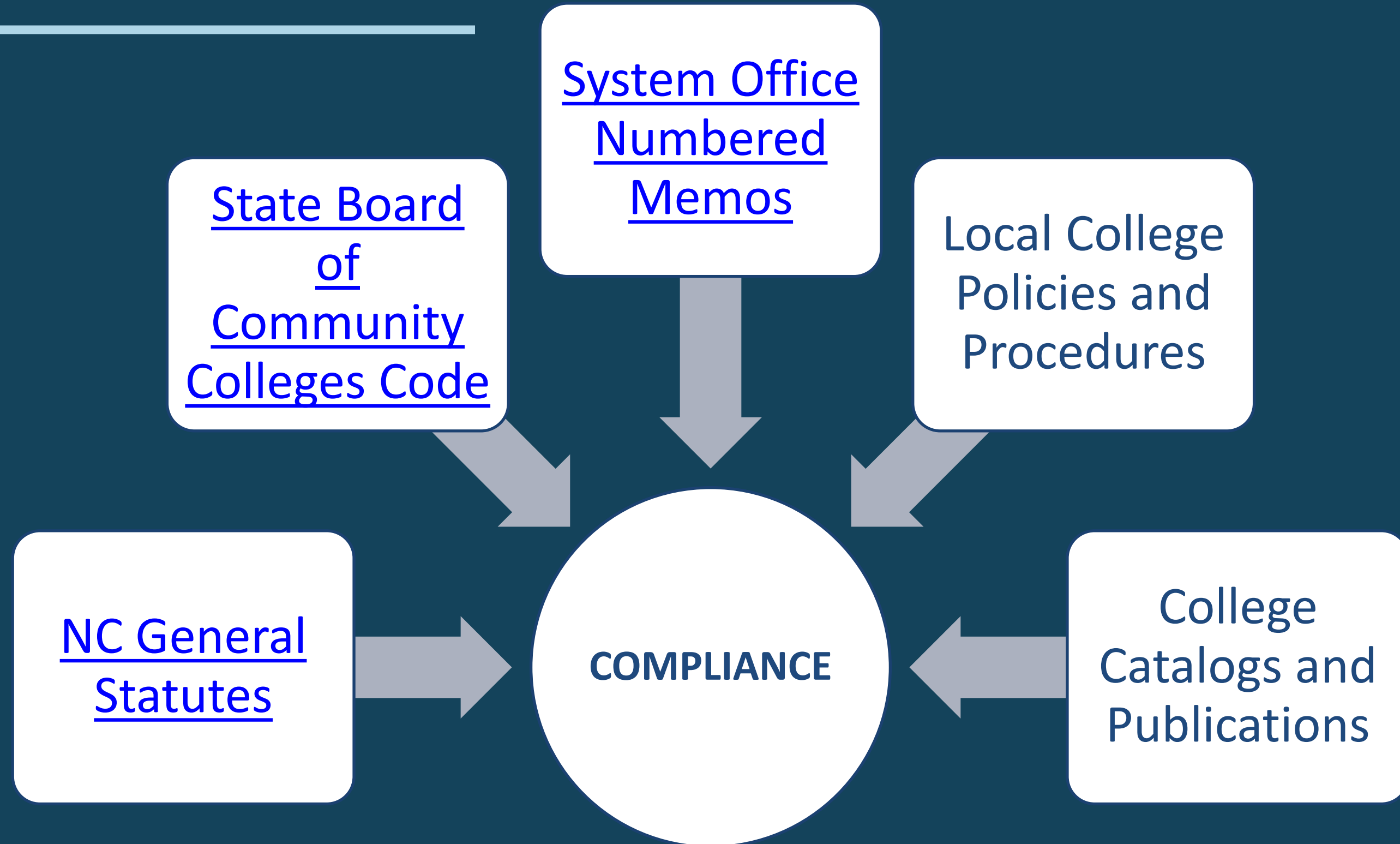
NOTES:

- This session is NOT being recorded.
- A copy of **this Power Point will be available on the NCCCS website in August 2024.**

MISSION



References



FTE Calculation

512 hours = 1 FTE

Tier funding

[State Budget Information](#)

1G SBCCC 100.1 Definitions [Full-Time Equivalent (FTE) and Academic Term Reporting Period]

Compliance Review Process

Prior to Onsite Review

4 Weeks Prior

- “Save the Date” email sent to President and President’s Assistant

2 Weeks Prior

- Class sample lists and **Compliance Review List** sent to the President and President’s Assistant

1 Week Prior

- Complete and return the **Compliance Review List** to the compliance examiner
- Email requested information to the compliance examiner

Sample of Class Records

- The sample of class records is a statistically valid sample randomly generated by software.
- The review begins when the sample of records is sent to the college president.
- **At this point, changes to the records may NOT be made.**

Reference

1G 400 FTE Reporting Accountability

Compliance Areas Reviewed

College and Career Readiness

- Attendance Records
- Captive Co-opted
- XPA Reports

**CC24-037 FY2024-25
Compliance Services
Updates and Review
Procedures**

Continuing Education

- Attendance Records
- Basic Skills Plus
- BLET
- CCP
- ISAs
- Captive Co-opted (Prison)
- WBL
- XPA Reports

Curriculum

- Attendance Records
- Basic Skills Plus
- BLET
- CCP
- ISAs
- Captive Co-opted (Prison)
- WBL
- XPA Reports
- Skills Labs

Compliance Review List

**Mark Yes or No
boxes as they apply
to your college.**

- This is a detailed list of all required documentation needed to complete the review.
- This list is sent to the college 2 weeks prior to the onsite visit along with the class samples.
- Email the CE Accountability & Integrity Plan, CE class visits, and CE CCP student list to the compliance examiner one week prior to the onsite review.
- Complete the Compliance Review List and email it to the compliance examiner in one single document.
- All documentation should be in the room when the compliance examiner arrives on campus, including time in/out sheets and LMS documentation.

Meetings During the Review

- The order in which the records are typically reviewed is 1) CCR, 2) CE, 3) CU; however, this can be adjusted based on college staff schedules.
- First Meeting: Questions
 - Compliance examiners will need to meet with college staff to ask questions.
- College staff are given two days to gather information for responses.
- Second Meeting: Responses
 - It is important that this meeting be attended by appropriate college staff who can answer the questions.



Compliance Review Results

No Findings

- Non-compliant hours less than 1% of the total hours in the sample of class records

Coaching Letter (Optional)

- Recommendations to mitigate risk

Minimal Finding

- Non-compliant hours exceed 1% of the total hours in the sample of class records

Material Finding (Reversion of Funds)

- Non-compliant hours exceed 5% of the total hours in the sample of class records

Official Attendance Records

- Every class must have an official attendance record.
- One official attendance record for each class should be provided. Original records are preferred.
- Attendance should be clearly documented throughout the class.



Attendance records must be

verified and signed by the

instructor who TAUGHT the class.



Official Attendance Records

CCR and CE

Colleges should have an Electronic Signature Policy if attendance records are signed electronically.

Information on the record should include:

- Class prefix, number, section, title, and section #
- Class start and end dates
- Census date – 10% (membership hour classes)
- Instructional delivery method
 - TR, IN, HY, BL, HF
- Class schedule (days, times, locations)
 - Scheduled hours should be consistent with the CCL (Combined Course Library).
 - Hours reported on the ICR (FTE report) should not exceed the scheduled class hours.
 - All class meeting dates should be shown.
- Final grades and withdrawal dates
- Printed name of instructor(s) who taught the class with **instructor signature and date**

CCR Class Files

Reference

1G SBCCC 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections

Class files should contain the following:

- Official attendance record
- Supporting documentation (time in/out, [clock time software](#) time in/out records, etc.)
- Final grade roster (GROS)
- Instructor payment
- LEIS forms are not needed for state compliance.

NOTE: If a student attends class, the student must remain on the roster.

CCR Contact Hour Classes

- **Attendance**: Total time for each day should be noted on the official attendance record in quarter hours (0.25, 0.5, 0.75, 1.00).
- **Time in/out Documentation**: Sign in/out sheets or [clock time software](#) documentation is required for all hours reported.
- **Class Schedule**: Do not report hours outside of the class schedule printed on the official attendance record.
- **Instructor Signature**: The official attendance record should be signed by the instructor(s) who taught the class and dated on or after the last day of class.
- **Instructor Pay**: Must be equal to or greater than the largest number of hours reported for an individual student on the attendance roster.

CCR Membership Hour Classes

- **Attendance**: Student entry into the class should be noted for each student.
 - Withdrawal dates should be noted.
- **Census Date**: Calculated the same as CE classes.
- **Class Schedule**: Must match the number of scheduled hours reported on the ICR (FTE Report).
- **Instructor Signature**: The official attendance record should be signed by the instructor(s) who taught the class and dated on or after the last day of class.
- **Instructor Pay**: Must be greater than or equal to the number of scheduled hours.

CCR

Clock Time Software

Documentation

**Clock time documentation
should be legible
(font size is readable).**

- Clock time software documentation is required.
- Attendance may be entered weekly for online classes; however, documentation of daily time in/out is required for review.
- Staff should total the hours per student, per day on the time in/out documentation.
- Synchronous online documentation should show student's name.

CE

Class Files

Class files should contain the following:

- Official attendance record
- Supporting documentation, if applicable
 - Time in/out sheets
 - LMS documentation
 - Clinical documentation
- Instructor payment documentation or proof of Professional Services Agreements (PSAs)
- Student payment or waiver documentation to include third-party pay

Reference

1G SBCCC 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections

CE Contact Hour Classes

- **Attendance**: Total time for each day should be noted on the official attendance record in quarter hours (0.25, 0.5, 0.75, 1.00).
- **Time in/out Documentation**: Sign in/out sheets should be provided for all hours reported.
- **Class Schedule**: Do not report hours outside of the class schedule printed on the official attendance record.
- **Instructor Signature**: The official attendance record should be signed by the instructor who taught the class and dated on or after the last day of class.
- **Instructor Pay**: Must be equal to or greater than the largest number of hours reported for an individual student on the attendance roster.
- **Student Payment**: Documentation should be clear and concise.

CE Membership Hour Classes

- **Attendance**: Student entry into the class should be noted for each student.
 - Students must enter prior to or on the census date and cannot withdraw prior to or on the census date.
 - Attendance should be maintained throughout the entire class.
- **Class Schedule**: Must match the number of scheduled hours reported on the ICR (FTE Report).
- **Instructor Signature**: The official attendance record should be signed and dated on or after the last day of class by the instructor(s) who taught the class.
- **Instructor Payment**: Must cover the number of scheduled hours reported on the ICR (FTE Report).
- **Student Payment**: Documentation should be clear and concise.

LMS

Documentation

CE

LMS documentation should be legible (font size is readable).

- LMS documentation should include:
 - Student name
 - Student ID (in case the name is different on the roster)
 - Class name/section
 - Name of assignment
 - Date assignment submitted or completed
- Only the first assignment is needed for review.

Online Classes

CCR and CE

**Actual date of student entry
should be noted on the
official attendance record.**

- Independently scheduled
(asynchronous delivery – membership hours)
- Census Date Calculation
 - Total class hours divided by 4; count from last day backwards
 - Census date cannot be the last day of class.
- LMS documentation showing the date each student entered the class.
- Attendance must be maintained throughout the class.

Hybrid (HY) Blended (BL) HyFlex (HF) Classes

CCR and CE

- Students must either attend the synchronous portion of the class on or before census OR complete an online assignment on or before census.
- If the student enters online, LMS or clock time documentation must be provided.
- When determining the census date, be consistent across all classes of that type.

Actual date of student entry should be noted on the official attendance record.

Instructor Payment

CE and CCR

References

1G SBCCC 100.99 Budget FTE Funding

1G SBCCC 200.94 Reporting of Student

Hours in Membership for Continuing

Education Course Sections

- Instructor payment documentation should be provided in the class files.
- Multiple instructors: Provide number of hours taught by each instructor. (PT and FT)
- Documentation should include class name, number of hours taught by each instructor, and pay rate/total amount paid.
- “Zero pay contracts” may be included for FT faculty who taught hours in the class.
- Instructors paid by timesheets – include timesheets with the class file.

Third Party Instruction

Professional Services Agreement (PSA)

- The signed agreement noting number of class hours, amount paid, and instructor name must be in the class file.
- Documentation showing that the PSA was paid must be in the class file.

Online Third-Party Platforms

- Documentation showing that payment was made to the third-party must be in the class file.

CE Registration Fees

- Receipt of payment for each student
- Fee amount charged and proof of payment
- Proof of payment by sponsorships and scholarships, including DPS and VA
- Fee Waivers
 - Fee amount noted in the file
 - Represents “revenue foregone by the state”

References

1G SBCCC 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections
1E SBCCC 800 Waivers



Public Safety Waivers

- Tuition and Registration Fee Waiver Reference Guide (CC24-021)
- **Students must attest to their agency affiliation and job classification for each class.**

References

1G SBCCC 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections
1E SBCCC 800 Waivers

HRD Waivers

- Students must provide their signature attesting to their eligibility for the fee waiver.
- Students must indicate their eligibility on the HRD fee waiver form. “Check the box.”

References

1D SBCCC 300.3 Program Description

1G 200.94 Reporting of Student Hours in
Membership for Continuing Education Course
Sections



Clinical Documentation

- Clinical documentation should be included in the class files at the beginning of the onsite review.
- Clear, concise, legible, and accurate
- 60-minute hours
- Dates, times, and locations for each student

**Do not report overlapping hours
between class and clinical.**

Basic Skills Plus

References

- N.C.G.S. 115D-5(b)(15)
- 1G 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections
- [Basic Skills Plus Implementation Guide](#)

- Students concurrently enrolled in CCR and Continuing Education classes
- CE Class Requirements
 - Provide employability skills
 - Provide job-specific skills
 - Provide developmental instruction
- Tuition Waiver Requirements
 - Educational Functional Level
- No overlapping hours between CE class and CCR classes
- CE and CCR staff should communicate

Basic Law Enforcement Training (BLET)

CJC 3938/LET 3110



- Sponsorship Letters or Tuition Payment
 - Sponsorship letters should be legible with agency name, date, name of student and appropriate signatures.
- Pre delivery report and email approval from CJ Standards
- Post delivery report sent to CJ Standards
- Final Calendar – shows completion of scheduled hours (totaled by staff daily/weekly/monthly)
- Census Date Calculation (10% of scheduled hours reported)
- Student Course Completion Record
 - Withdrawal/Termination Date is the date used to determine official withdrawal from BLET.
- Instructor payment for all scheduled hours

Reference
1E SBCCC 800 Waivers

BLET Limited/Partial Enrollees

- Sponsorship Letters or Tuition Payment
- CJ Standards letter stating required coursework and hours
- Pre and Post delivery reports
- Contact Hours: Daily hours should be noted on the attendance record and match the final class calendar.
- Student Course Completion Record
 - Withdrawal Date/Termination Date
- Instructor payment for hours reported



Reference

1E SBCCC 800 Waivers



Career and College Promise (CCP)

- Students cannot be enrolled in more than two pathways during a single semester – including CU pathways.
- Students should not take classes outside of their approved pathway.
- Follow guidelines outlined in [Section 14 of the Curriculum Procedures Reference Manual](#). (Includes CE rules)
- Pathways must be approved for all high schools.
- Changes to pathway courses must be approved by the System Office.

Tip: Save a spreadsheet of enrolled CCP students for each semester once their pathways have been set. (Snapshot)

Reference

1D SBCCC 400.11 Education Services through Career and College Promise

Instructional Service Agreements (ISAs)

Reference

1D SBCCC 400.7 Instructional Service Agreement

- Partnership agreements between colleges
- Provide copies of ALL agreements (Levels I and II)
- Provide ISA termination documentation, if applicable
- Terms of agreement
- Signed by appropriate staff
- Adjustments for shared hours
- Attendance records for each class

Captive Co-Opted Instruction Prisons/Jails

- CE classes must be State Board approved
- Can be reported as membership OR contact hours
- Designate course type with “P” or “J” (both CCR and CE)
- Documentation of fee payment
- These classes are for inmates.

References

- N.C.G.S. 115D-5(c)
- 1D SBCCC 700.98 Instruction to Captive or Co-opted Groups
- 1E SBCCC 200.2 Time Due, Deferred Payment, Failure to Pay
- 1G 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections



Work-Based Learning (WBL)

- Minimum of 20 hours for work-based learning course section
- CE course
 - Aligned with skill development in MLO
 - Scheduled for 96 hours
 - Leads to state regulated or industry recognized credential
- Completed minimum of 48 hours in a CE course prior to enrollment in WBL course
- Documentation of student payment
- Documentation of instructor payment
- Do not report students who do not have a workbook and timesheets.
- Do not report students who did not begin the work experience.

References

- 1D SBCCC 300.10 Work-Based Learning
- [Curriculum Procedures Manual, Section 20](#)

Internal Audit Reports (XPA)

Reports must be generated based on established term dates:

- Spring Term (Period 1): January 1 through May 15
- Summer Term (Period 2): May 16 through August 14
- Fall Term (Period 3): August 15 through December 31

- **Generate and review XPA reports on or after the last day of the term.**
- **Make appropriate notes on ALL reports.**

References

1G SBCCC 100.1 Definitions

CC99-235 Computerized Audit Programs

CC98-362 Clarification of Continuing Education Topics
(Overlap)

XPA Reports

XPAO Underage Report

- Students under 16 may not be reported for FTE except 15-year-old students enrolled in FIP classes approved by the System Office (PS Memo 23-02)

XPAQ Overlap Report

- Students listed on this report have overlapping class hours.

Overlap Report (XPAQ)

- Colleges may not report hours for students in classes where days/times overlap.
- Remove the class hours with the lowest FTE.
- Public Safety classes: Remove only the hours that overlap.
- Note adjustments on reports.
- Curriculum and Continuing Education staff should work together to review the XPAQ report.

Remember: It's about the class, not the student.

Instructor Responsibilities

- Review attendance roster for accuracy (schedule, student names, etc.)
- Mark attendance correctly for each student
- **Certify (sign) and date the roster**
- Note any changes to the regular schedule of the class, and how the hours were made up
- Return the attendance record along with additional documentation, if applicable, in a timely manner to the appropriate staff member
- Additional documentation may include:
 - Time in/out sheets for contact hour classes
 - LMS documentation for online/hybrid/blended/hyflex classes
 - Clinical documentation
- Review instructional payment contract for accuracy

ICR Adjustments

- Note adjustments in the files or XPA reports.
- Be clear with your adjustment notes.
- Be mindful of how you add or subtract hours.
- Adjustments may be made in the following semester. It is not necessary to make adjustments Fall to Fall or Spring to Spring.

Records Corrections



- Document all changes and corrections.
- Do Not Use Whiteout (or any product like Whiteout)
- Strike through the mistakes and note the correction. If a roster/other document becomes hard to read, include corrected information in some manner.

CCR Top Issues

1. Hours reported were miscalculated, such as:
 - Hours were rounded incorrectly (0.25, 0.5, 0.75, 1).
 - Student time was recorded on the roster incorrectly.
 - Hours were reported for time outside of the scheduled class hours listed on the roster.
2. Total time was not calculated on the clock time software documentation. Online hours must be totaled for each student for each day.
3. Attendance rosters and/or clock time software documentation was too small to read.
4. Instructor Signature
 - No instructor signature
 - Attendance Roster signed prior to end of class
 - Signed by someone other than the instructor of record

CCR Top Issues (continued)

5. Instructor(s) were not paid for enough hours.
6. The instructor of record was absent, and documentation of the change was unclear.
7. Clock time documentation was not available.
8. HSE in the Community
 - Packets were missing.
 - Tutoring hours were reported.
 - Partial hours were reported.
 - Reported under incorrect prefix – Must be reported as BSP 2000.

CE Top Issues

1. Instructor Errors

- Did not sign the roster.
- Did not record attendance properly.
- Did not maintain LMS documentation.
 - Deleted information
 - Not printed in a timely manner
 - Missing withdrawn students

2. Instructor Pay

- Instructor was not qualified to teach the class.
- Instructor payment documentation showed the instructor did not participate in teaching the class.
- Instructor payment documentation was missing.
- PSA payment was not made/not provided.

CE Top Issues (continued)

3. Census Date

- Number of students enrolled at census was reported incorrectly.
- Census date was calculated incorrectly for online classes.
- Students withdrew prior to census and were reported.
- LMS documentation was not provided/students entered before class began or after census.

4. Scheduled Hours

- Class was reported for more hours than scheduled/held.
- Difficult to determine number of hours online/seated for blended or hybrid class.
- Class dates were not listed on the roster.

CE Top Issues (continued)

5. Student Registration Payment

- Payment was not made/proof of payment was not provided.
- Third-party pay not made/provided.

6. Public Safety Waivers

- Student attestation was incomplete or missing.
- Students were waived in error.
- Waiver amount was not recorded in file.

7. HRD Issues

- Contact hours were miscalculated.
- Students did not mark eligibility reason for waiver.
- Students did not sign the form attesting to waiver eligibility.

CE Top Issues (continued)

8. EMS class/clinical overlap

- Clinical documentation was not provided.
- Documentation did not list the locations and time in/out.

9. BLET

- Census date was not calculated properly.
- Students withdrew prior to census as noted on the Student Course Completion Record.
- Limited Enrollees were not reported properly.

10. XPA Reports

- Adjustments were noted, but not made.
- No evidence the reports were reviewed.
- Student under the age of 15 enrolled in FIP classes.
- Student began class at age 15 and turned 16 before end of class.
- Date range was incorrect.

Best Practices to Mitigate Risk

- Review records and make adjustments prior to submitting the ICR (FTE Report).
- Communicate with the staff member who submits the ICR to make sure BLET and WBL students are reported correctly.
- For online classes, check LMS documentation to make sure students entered prior to or on census.
- Teach instructors how to accurately complete attendance documentation.



COLLABORATION

The Compliance Team collaborates regularly with System Office Staff and with each other to ensure consistency of guidance provided to the individual colleges.

If you have questions, please contact the Compliance Examiners, Business Systems Analysts, or System Office staff.

We are here to help!

Final Reminder

**HELP CONTROL
THE PET
POPULATION -
HAVE YOUR
PETS SPAYED
OR NEUTERED.**

- BOB BARKER



**MAKE SURE ALL
ATTENDANCE
RECORDS ARE
VERIFIED AND
SIGNED BY THE
INSTRUCTOR WHO
TAUGHT THE
CLASS.**

~ AMANDA TOLAR



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