NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

NC COMMUNITY COLLEGES

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2024 NCCCS Compliance Services Regional Training Check-In

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Compliance Services

Curriculum Regional Training 2024

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Agenda

Overview of Compliance Services

Compliance Review Process

Areas of Review

Top Compliance Issues

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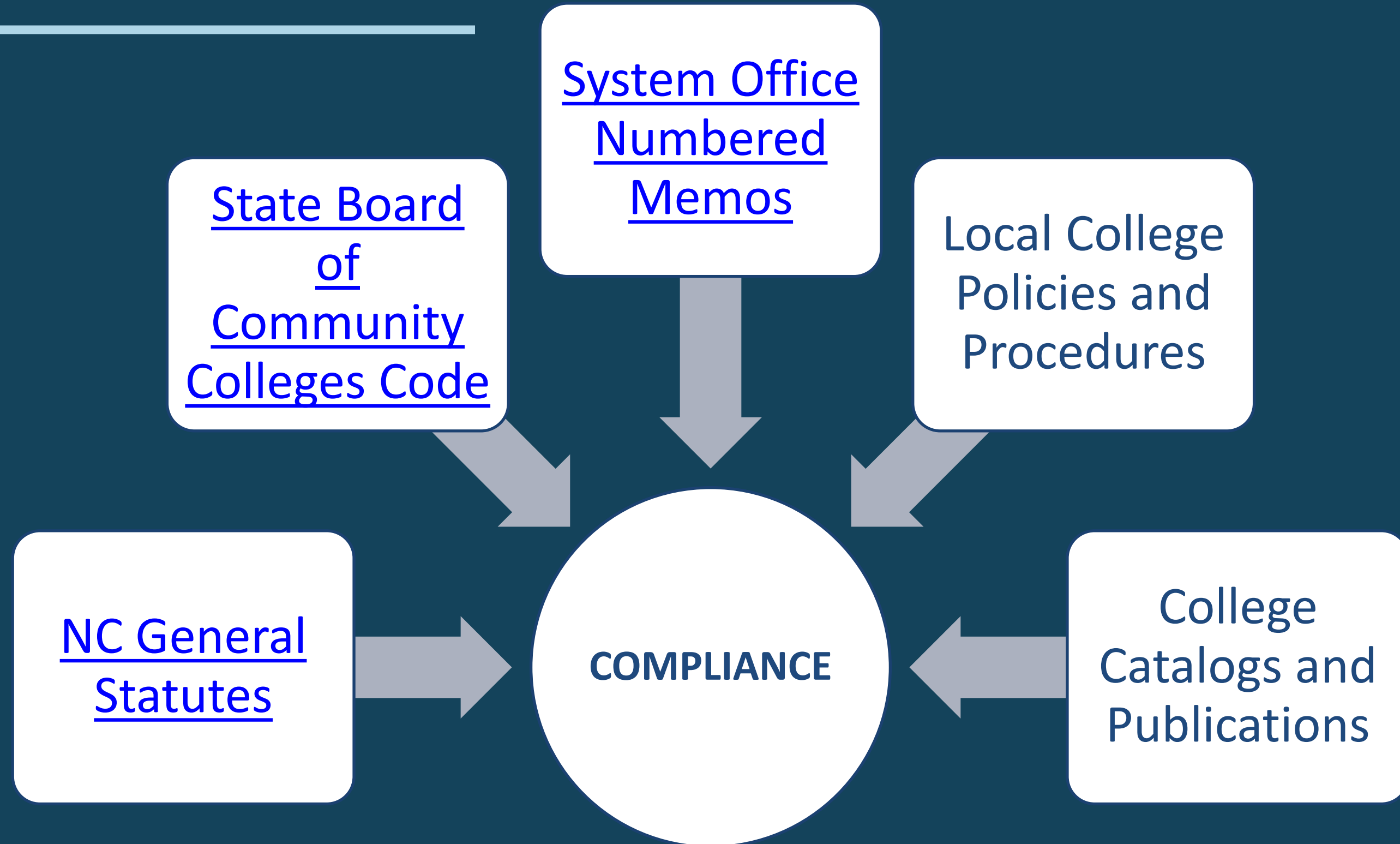
NOTES:
- This session is NOT being recorded.
- A copy of **this Power Point will be available on the NCCCS website in August 2024.**

MISSION

Compliance Reviews

Accountability and Credibility

Coaching and Training

COMPLIANCE SERVICES

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Compliance and Accountability | NC Community Colleges

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]

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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

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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

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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 CCP student list and Skills Lab 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

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Official Attendance Records

- Every class must have an official attendance record.

- For compliance reviews, please provide the final attendance record that was used to complete the ICR.

- Attendance should be clearly documented on all parts of the record (Seated/Online and Lecture/Lab/ Clinical).

Attendance records must be verified and <u>signed</u> by the instructor who <u>TAUGHT</u> the class.

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Official Attendance Records

Curriculum

Self Service attendance rosters should be printed in landscape mode to make the font legible.

- Official attendance records include:
  - Class prefix, number, section, title
  - Name of instructor(s)
  - Start and end dates
  - Census date
- Class schedule (days, times, locations)
  - Scheduled hours consistent with the CCL (Combined Course Library)
  - Hours reported on the ICR (FTE report) should not exceed the scheduled class hours
- Delivery method (TR, IN, BL, HY, HF)
- **Signature of instructor**
- **Certification of accuracy with date**

Curriculum

Documentation

- **FINAL** Attendance Rosters
  - With final grades and withdrawal dates noted
- Membership-Hour Classes
  - Attended class or completed an online assignment prior to or on the census (10%) date and did not withdraw prior to or on the census date
  - Correct census date calculation
- Contact-Hour Classes
  - Daily time recorded on the roster
  - Time in/out documentation
- Scheduled hours
  - Hours consistent with CCL (Combined Course Library)
- **Instructor signature and date**
  - On or after census for membership
  - On or after last day of class for contact

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Online Classes

Curriculum

- Asynchronous delivery or synchronous

- LMS documentation showing the date each student completed the first assignment in the class is required if delivered asynchronously.

- Attendance must be documented through the census date.

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

Hybrid (HY)

Blended (BL)

HyFlex (HF)

Curriculum

- Students must either attend the synchronous portion of the class prior to or on the census date <u>OR</u> complete an online assignment prior to or on the census date.

- If the student enters online, LMS documentation showing the completion of an assignment and date of completion is required.

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

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LMS Documentation

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.

Clinical Documentation

- Clinical documentation should be included with the attendance record at the beginning of the onsite review.

- Clear, concise, legible, and accurate

- 60-minute hours

- Dates, times, and locations for each student

Check for overlaps between class and clinical hours

Basic Skills Plus

References
- N.C.G.S. 115D-5(b)(15)
- 1G SBCCC 200.93 Reporting of Student Hours in Membership for Curriculum Classes
- Basic Skills Plus Implementation Guide

- Students must be concurrently enrolled in CCR and Curriculum classes.
- Curriculum Class Requirements
  - Provide employability skills
  - Provide job-specific skills
  - Provide developmental instruction
- Tuition Waiver Requirement
  - Educational Functional Level
- No overlapping hours between CU class and CCR class
- CU and CCR staff should communicate to ensure correct reporting of hours.

Academic Skills Lab

- Report seated and online hours separately on the ICR (FTE Report).

- Report as 60-minute hours.

- Do not report overlapping hours between class and tutoring hours.

- Provide student class schedules (RGST) for chosen students.

- Provide instructor referral for chosen students.

- Students must be enrolled in the course for which they are receiving tutoring.

1D SBCCC 400.8 Courses for Curriculum Programs

Basic Law Enforcement Training (BLET)
CJC 110/LET 110

- 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
- <u>Final</u> 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.

<u>Reference</u>
1E SBCCC 800 Waivers

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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

Reference
1E SBCCC 800 Waivers

Career and College Promise (CCP)

- Students cannot be enrolled in more than two pathways during a single semester – including CE pathways.

- Students should not take classes outside of their approved pathway.

- Pathways and changes to pathway courses must be approved by the System Office.

- Follow guidelines outlined in [Section 14 of the Curriculum Procedures Reference Manual](#).

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

<u>Reference</u>
1D SBCCC 400.11 Education Services through Career and College Promise

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Instructional Service Agreements (ISAs)

Reference
1D SBCCC 400.7 Instructional Service Agreement

- Partnership agreements between colleges

- Provide copies of ALL agreements (Levels I, II, and III)

- Provide ISA termination documentation, if applicable

- Meet terms of agreement

- Signed by appropriate staff

- Adjustments for shared hours (SSS)

- Attendance records for each class

Captive

Co-Opted

Instruction

Prison Classes

- CU program must be State Board approved.
- Can be reported as membership OR contact hours.
- Designate course type with "P".
- Documentation of tuition payment

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)

- A workbook must be maintained for all WBL students reported for FTE.

- Documentation of attendance between the start date of the class and the census date
  - Orientation OR timesheets

- Max hours = 320 *(max 640 hours for Apprenticeships)*

- Do not report students who do not have a workbook and timesheets.

- Do not report students who did not start the work experience.

References
- 1D SBCCC 300.10 Work-Based Learning
- Curriculum Procedures Manual, Section 20

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Internal Audit Reports

- 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 Classification of Continuing Education Topics (Overlap)

XPA Reports

XPAA
WBL Report

- All students reported should have the WBL class included in their program of study.

XPAU
Underage Report

- Students should be coded correctly, and in proper program of study.

XPAQ
Overlap Report

- Students listed on this report have overlapping class hours.

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Overlap Report (XPAQ)

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

The overlap report (XPAQ) 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

- Colleges may not report hours for students in classes where days/times overlap.
- Remove the class hours with the lowest FTE.
- Note adjustments on reports (legible and easy to understand)
- Curriculum and Continuing Education staff should work together to review the XPAQ report.

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Instructor Responsibilities

- Review attendance roster for accuracy (schedule, student names, etc.).
- Mark attendance correctly for each student.
- **Certify (sign) and date the attendance record.**
  - Membership hour classes: certify on or after the census date
  - Contact hour classes: certify on or after the last day of class
- 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 (including independent study classes)
  - LMS documentation for online, hybrid, blended, or hyflex classes
  - Clinical documentation

ICR Adjustments

(FTE Report)

- Note adjustments on the attendance record or on XPA reports.
  - Be clear when noting adjustments.
- 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 document becomes hard to read, include corrected information in a clear and legible manner.

CU Top Issues

1. **The instructor of record did not sign/certify the official attendance record.**

2. **The instructor did not indicate attendance for some, or all, students on the official attendance roster. (No Ps on the roster)**

3. **LMS documentation of online student entry was not provided, student entered before first day of class, or after census.**

4. **The scheduled hours on the official attendance record did not match the hours reported on the ICR (FTE report).**

CU Top Issues (continued)

5. **WBL**

- **Students did not start the work experience or complete an orientation prior to census.**

- **Students did not have workbooks or timesheets.**

- **WBL class was not in the student's program of study.**

6. **CCP**

- **Students enrolled in classes outside of their approved pathway.**

- **Pathway was not approved by SO.**

- **Students were enrolled in 3 or more active pathways during a semester.**

CU Top Issues (continued)

7. **BLET**

   - **Census date calculated incorrectly.**

   - **Student withdrew prior to census based on Course Completion Record.**

   - **Sponsorship forms were incorrect.**

   - **Limited enrollees were reported for more hours than standards allowed.**

8. **Clinical Documentation**

   - **Documentation did not include start time and daily hours.**

   - **Documentation was not provided.**

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.

- For classes with an online and seated portion, attendance should be indicated on both rosters.

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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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