



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

George Fouts

Interim President

November 24, 2015

MEMORANDUM

TO: CC Chief Academic Officers
CC Continuing Education Officers
CC Continuing Education Registrars
CC Registrars

FROM: Bryan Jenkins
Executive Director of Accountability and State Board Affairs

Elizabeth C. Self
Director of Compliance Training

RE: Public Safety Waivers: Compliance Elements for Proof of Eligibility

The reinvention of our System's accountability function is based on the guiding principles of integrity, fairness, and consistency. To that end, we endeavor to provide colleges on an on-going basis clearer information about documentation expectations related to FTE reporting and the charging and waiving of tuition. The purpose of this memo is to provide information on the appropriate issuance of public safety training waivers and to specify documentation that colleges should maintain on file to ensure compliance.

Specifically, this memo does the following:

- 1) Identifies relevant laws, policies, and resources that provide guidance for making public safety waiver determinations; and
- 2) Defines the specific data elements that colleges need to maintain on file for compliance reviews.

CC15-037
E-mail Copy

Relevant Waiver Guidance

G.S. 115D-5(b)(2) authorizes the State Board of Community Colleges to provide identified public safety entities a waiver of tuition and registration fees for courses that “support the organizations’ training needs” and “are on a specialized course list” approved by the State Board.

In addition to the General Statute referenced above, the following guidance is relevant when making student waiver-eligibility determinations for public safety training:

- **SBCC Code 1E SBCCC 800 Waivers** that specifies State Board rules related to waivers;
- The **Specialized Course List**, as approved by State Board action on September 18, 2015 and subsequently amended;
- The **NCCCS Tuition and Registration Fee Waiver Reference Guide**, which incorporates the information above, and includes additional information such as appropriate Discount and AR Codes (see Numbered Memo CC15-038 for a copy of most current guide).

Colleges have asked for further clarification on the specific documentation they need to keep on file for compliance review as it relates to public safety training waivers. The following list of compliance data elements is provided to define what is required to establish “proof of eligibility”.

Proof of Eligibility Compliance Data Elements

To document public safety training waiver eligibility, the following must be on file for compliance review:

Waiver Eligibility Factors	Required Compliance Data Elements
Student Identity	<ul style="list-style-type: none"> • Name (printed) • Signature that attests to agency affiliation and job classification <i>This may be the same signature provided for the Student Attestation/ Proof of Eligibility requirement below.</i>
Authorized Group or Organization	<ul style="list-style-type: none"> • Name of Public Safety Agency/Department/Team that the student is employed by/affiliated with that meets waiver requirements. <i>If agency is abbreviated, college must provide key for compliance review.</i> • Job Classification associated with each student’s waiver eligibility. <i>Job classification data may be captured in broad categories, such as the <u>examples</u> listed below (except for NCDPS):</i> <ul style="list-style-type: none"> <input type="checkbox"/> Firefighter (Vol Agency); <input type="checkbox"/> Firefighter (County/State/Municipal Agency) <input type="checkbox"/> EMS Responder (Vol Agency); <input type="checkbox"/> EMS Responder (County/State/Municipal Agency)

Public Safety Waiver Compliance
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	<input type="checkbox"/> Emergency Mgt. Personnel; <input type="checkbox"/> Named in EOP <input type="checkbox"/> Telecommunicator/Dispatcher <input type="checkbox"/> LE Officer; <input type="checkbox"/> Detention Officer <input type="checkbox"/> Sponsored BLET <input type="checkbox"/> DACJJ Certified Officer (Note: Student must indicate specific title for DACJJ; See Appendix in Waiver Reference Guide for eligible Corrections/JJ job titles.) <input type="checkbox"/> Other: _____
Eligible Training	<ul style="list-style-type: none"> • Course ID Number (ex. CJC-xxxx) and Local Course Title
Student Attestation/Proof of Eligibility	<ul style="list-style-type: none"> • Signed confirmation/attestation of eligibility by student <i>Signature should acknowledge/confirm a statement such as the following:</i> <i>Sample Statement:</i> "My signature attests that I am actively affiliated with the public safety agency listed and that I hold the job classification indicated." • BLET Sponsorship Letter, where applicable

Local Work Flow/Business Practices

The information above is merely a list of the required data elements and examples of acceptable wording. There is **no requirement that colleges use a particular form or format**, and there is no expectation that colleges will change local business practices/college workflow if accountability measures already in place capture these data elements. Likewise, this guidance does not change a college's authority to require the collection of additional, locally-identified data elements, if it so desires.

This guidance supersedes any previous guidance provided by the System Office on this issue. For example, colleges **are not required by the System Office** to review public safety agency rosters or letters of affiliation for each student. This guidance is designed to clearly communicate Compliance Services documentation expectations and assist staff in **appropriately balancing compliance and customer service** when issuing fee waivers related to public safety training. If, however, there is ever evidence of the fraudulent documentation at an individual college, the documentation requirements **for that specific college** may be amended for a defined period of time because of the increased risk of non-compliance.

The training that your college provides for this important workforce sector ensures that local and state public safety responders are ready to work and ready to respond. We hope this guidance helps make meeting this mission a little easier. Thank you.

CC: Ms. Jennifer Haygood, NCCCS
 Dr. Lisa Chapman, NCCCS
 Ms. Barbara Boyce, NCCCS
 Mr. Wesley Beddard, NCCCS