

# **Compliance Services**

**CCR and WCE Regional Training 2025**

**Compliance Team**

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# AGENDA

- Overview of Compliance Services
- Compliance Review Process
- Areas of Review
- Top Compliance Issues
- Open Forum for Questions

**A copy of this Power Point will be available on the NCCCS website in August 2025.**

# Compliance Services Webpage

Link: [Compliance & Accountability - NCCCS](#)

NCCCS Website



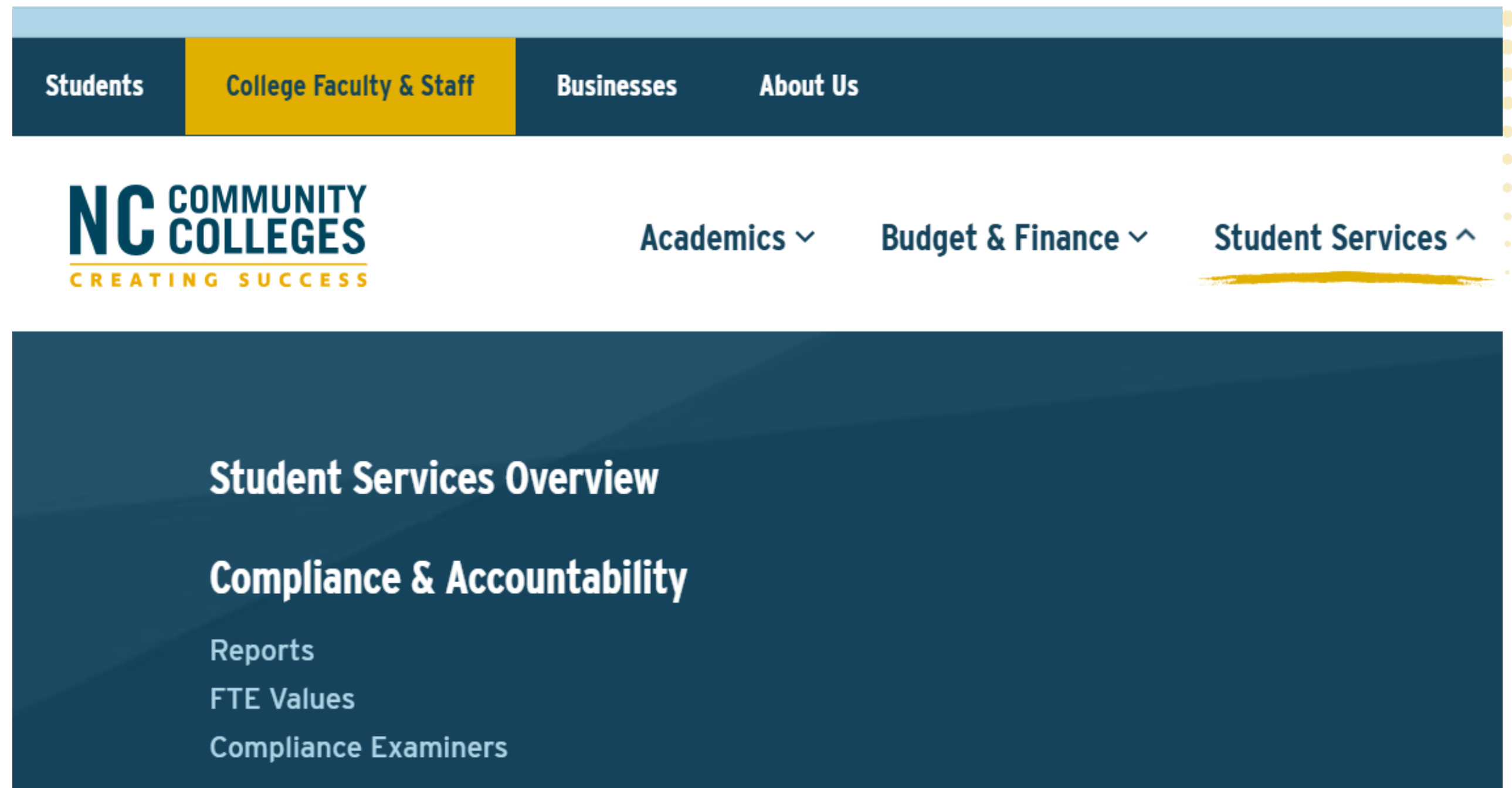
College Faculty & Staff



Student Services



Compliance &  
Accountability



# What is the mission of NCCCS Compliance Services?

- A. Conduct bi-annual Compliance Reviews at each of the 58 Community Colleges.
- B. Ensure credibility and accountability for NCCCS and the Great 58.
- C. Provide coaching and training to college staff to ensure compliance with NC General Statutes and State Board Code.
- D. All of the above.

# MISSION



**Compliance  
Reviews**

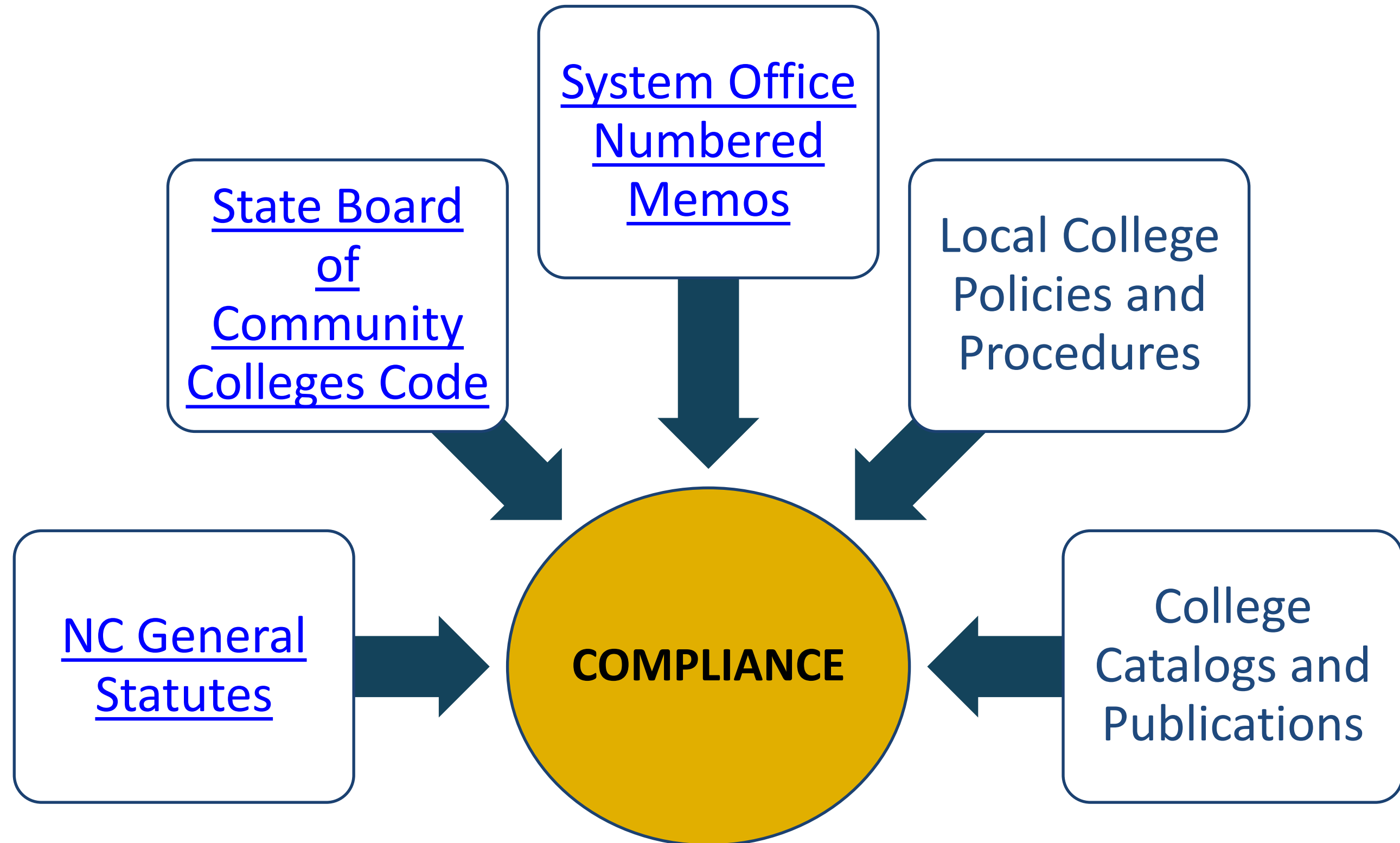
**Accountability and  
Credibility**

**Coaching and  
Training**

**Answer:**

**D. All of the above**

# REFERENCES



# FTE Calculation

512 hours = 1 FTE

NORTH CAROLINA COMMUNITY COLLEGE SYSTEM	
Per Capita Costs for Budget FTE	
FY 2024-25	
<b>Tier 1A</b>	
Instruction	\$ 5,215.16
Institutional and Academic Support	1,974.00
<b>Total</b>	<b>\$ 7,189.16</b>
<b>Tier 1B</b>	
Instruction	\$ 4,613.41
Institutional and Academic Support	1,974.00
<b>Total</b>	<b>\$ 6,587.41</b>
<b>Tier 2</b>	
Instruction	4,011.66
Institutional and Academic Support	1,974.00
<b>Total</b>	<b>\$ 5,985.66</b>
<b>Tier 3</b>	
Instruction	2,539.38
Institutional and Academic Support	1,974.00
<b>Total</b>	<b>\$ 4,513.38</b>

## 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



# When can you make changes to your records?

- A. Anytime prior to receiving the sample of class records 2 weeks prior to the onsite compliance review.
- B. Anytime prior to the compliance examiners arriving on your campus for the onsite review.
- C. Anytime prior to or during an onsite compliance review.
- D. No changes may be made to the records after you submit the Institutional Class Report (ICR).

# Sample of Class Records

**Reference**  
**1G 400 FTE Reporting**  
**Accountability**

**Answer: A. Changes to the records may not be made after the college receives the sample of class records – 2 weeks before the onsite review.**

- The review begins when the sample of records is sent to the college president.
- The sample of class records is a statistically valid sample randomly generated by software.

# COMPLIANCE AREAS REVIEWED

1

## College and Career Readiness

- Attendance Records
- XPA Reports
- Captive Co-opted

[CC25-068 FY2025-26  
Compliance Services  
Updates and Review  
Procedures](#)

2

## Workforce Continuing Education

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

3

## Curriculum

- Attendance Records
- XPA Reports
- CCP
- WBL
- BLET
- ISAs
- Captive Co-opted (Prison)
- Basic Skills Plus
- 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.
- College staff should communicate to accurately complete the **Compliance Review List**. Return to examiner as one single document.
- Email WCE Accountability & Integrity Plan, WCE class visits, and WCE CCP student list to the compliance examiner one week prior to the onsite review.
- Class files should be complete with all required documentation and should be in the room when the compliance examiner arrives on campus.

# Meetings During the Onsite Review

## First Meeting: Questions

- Compliance examiners will meet with college staff to ask questions.

College staff are given two days to gather information for responses.

## Second Meeting: Responses

- This meeting should be attended by college staff who can answer the questions.

## Final Training for College Staff

- Includes issues specific to the college.
- Usually conducted the 2<sup>nd</sup> week of the onsite review.

**Please do not  
remove post it  
notes.**

**Records are typically reviewed in this  
order: 1) CCR 2) WCE 3) CU  
*This can be adjusted based on college  
staff schedules.***

**Which of the following Compliance Review Reports require funds to be returned to the state?**

- A. Final No Findings Report
- B. Minimal Findings Report
- C. Material Findings Report
- D. Coaching Letter
- E. All of the above
- F. None of the above

**Answer: C is correct.**



# COMPLIANCE REVIEW RESULTS

## No Findings

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

## Minimal Finding

- Non-compliant hours **exceed 1%** of the total hours in the sample of class records – less than 5%



## Material Finding (Reversion of Funds)

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

## Coaching Letter (Optional)

- Recommendations to mitigate risk



# Official Attendance Records

» *very* «  
*Important*

- Every class must have one 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 signed by the  
instructor who TAUGHT the class.

# Official Attendance Records

Class prefix, number, section,  
title, and contract/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

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

# College and Career Readiness (CCR)

## CCR class files should contain the following:

- Official attendance record (ADVANSYS)
- Supporting documentation (time in/out including [clock time software](#) documentation)
- 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.**

# Workforce Continuing Education (WCE)

## WCE 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 third-party instructional pay, such as Professional Services Agreements (PSAs)
- Student payment or waiver documentation to include third-party payment

# CCR and WCE Contact Hour Classes

## Attendance

- Total time for each day should be noted on the official attendance record recorded in quarter hours (0.25, 0.5, 0.75, 1.00).

## Time in/out Documentation

- Student 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.

## Student Payment (WCE only)

- Documentation should be clear, concise, and easy to understand.



# CCR and WCE Membership Hour Classes

## Attendance

Indicate student entry into the class for each student.

\*Note withdrawal dates, if applicable.

Maintain attendance throughout the entire class.

## Census Date

10% of the total hours reported on the ICR (FTE Report).

Students must enter prior to or on the census date and cannot withdraw prior to or on the census date.

## 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

WCE only

Payment should be clear, concise, and easy to understand.

**\*It is recommended that each college adopt an official withdrawal policy for both CCR and WCE membership hour classes.**

# Online Classes (IN)

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 or clock time  
documentation showing  
the date each student  
completed the first  
assignment in the class.

Attendance must be  
maintained throughout  
the class.

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



# Hybrid (HY), Blended (BL), and Hyflex (HF) Classes

**Actual date of student entry must be noted on the roster.**

- 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.

# CCR Online Documentation

- Online (clock time software) documentation must show daily time in/out.
- 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 full name.

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

# WCE LMS Documentation

## 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

LMS documentation should be legible and easy to understand.

**Only the first assignment is needed for review.**

**Maintain access to LMS documentation until released from compliance review.**

# Instructor Payment Documentation

Instructor payment documentation should be provided in the class files.

Documentation should include class name, number of hours taught by each instructor, and pay rate/total amount paid.

Multiple instructors:  
Provide number of hours taught by each instructor. (PT and FT)

“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.

## References:

- 1G SBCCC 100.99 Budget FTE Funding
- 1G SBCCC 200.94 Reporting of Student Hours in Membership for Continuing Education Course Sections

# 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.

**PSAs, Ed2Go,  
Career Step, etc.**

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# Student Fee Payment Documentation

Include receipt of payment for each student

Note fee amount charged and proof of payment

Include proof of fee 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 Fee Waivers

## References

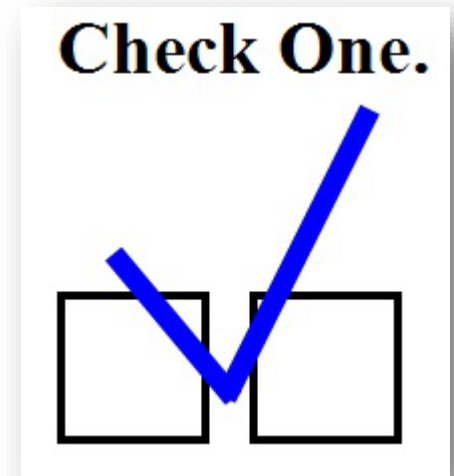
1D SBCCC 300.3 Program

Description

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

- Students must indicate his/her eligibility on the HRD fee waiver form:

1. Unemployed
2. Have received notification of pending layoff
3. Working and eligible for the federal earned income tax credit
4. Working and earning wages at or below two hundred percent (200%) of the federal poverty guidelines. See [HRD Guide](#).



- Students must provide their signature attesting to their eligibility for the fee waiver.

# 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 students

Do not report overlapping hours between class and clinical time.

***DON'T  
FORGET!***

Attendance records must  
be signed by the instructor  
who taught the class.

# Internal Audit Reports

- Must be generated based on established term dates:
  - Spring Term (Period 1): January 1 – May 15
  - Summer Term (Period 2): May 16 – August 14
  - Fall Term (Period 3): August 15 – December 31
- Generate and review XPA reports on or after the last day of the term.
- Make appropriate notes on ALL reports

## XPA Reports

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### References

1G SBCCC 100.1 Definitions

CC99-235 Computerized Audit Programs

CC98-362 Classification of Continuing Education Topics (Overlap)

# Internal Audit Reports (XPA)

1

## Underage Report XPAU

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)

2

## Overlap Report XPAQ

Students listed on this report have overlapping class hours that may need to be adjusted.

# Overlap Quiz

2 hours  
should be  
adjusted.

**Scenario 1:** On the overlap report, Patrick Starr shows a true overlap between FIP 4001 and FIP 4535 for two hours on one day. FIP 4001 was reported for 10 hours for each student and FIP 4535 was reported for 25 hours for each student. How many hours should be adjusted on the ICR?

**Scenario 2:** On the overlap report, Pearl Krabb shows an overlap between WLD 3106 and HOS 3058. WLD 3106 was reported for 200 hours and HOS 3058 was reported for 18 hours. There was a true overlap of one hour on the first day of HOS 3058. The student did not withdraw from either class..

Remove 18  
hours for  
HOS 3058

# Student Overlap Report (XPAQ)

Colleges may not report hours for students in classes where days/times overlap.

Pay special attention to hyflex (HF) classes. Treat as traditional (TR) delivery.

Remove the class hours with the lowest FTE.

Public Safety classes:  
Remove only the hours that overlap.

Note adjustments on reports (legible and easy to understand)

CU and WCE staff should work together to review the XPAQ report.

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



# CCP True or False?

CCP students can be enrolled in one WCE CCP pathway and two CU CCP pathways at the same time.

**FALSE**

Students may be active for only two pathways during a single semester:

- 1 CU and 1 WCE
- 2 CU
- 2 WCE

**For WCE CCP,  
Compliance is  
looking for  
which of the  
following?**

- A. WCE pathways were approved by the System Office for each high school.
- B. CCP waiver was applied to the students' accounts.
- C. Students completed only the courses listed in the approved pathway.
- D. All of the above.

**Answer: D is correct.**

# Career and College Promise

- 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 WCE rules)
- Pathways must be approved for each high school.
- Changes to pathway courses must be approved by the System Office.

# CCP

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

Reference  
1D SBCCC 400.11  
Education  
Services through  
Career and  
College Promise

**What  
documentation is  
needed to report  
a WCE WBL  
student for FTE?**

- A. Complete 48 hours of instruction in a WCE class.
- B. Have a Student Time Sheet.
- C. Documentation of Student Pay.
- D. Documentation of Instructor Pay.
- E. All of the above.

**Answer: E is correct.**

# Work Based Learning (WBL)

- Do not report students who do not have a timesheet.
- Do not report students who did not start the work experience

## References

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

- WBL class must be a minimum of 20 hours.
- WCE course must meet these requirements:
  - Aligned with skill development in MLO
  - Scheduled for 96 hours
  - Leads to state regulated or industry recognized credential
- Students must complete a minimum of 48 hours in WCE course prior to beginning the WBL course
- Provide documentation of student payment.
- Provide documentation of instructor payment.
- Documentation of attendance between the start date of the class and the census date.
  - Attend WBL orientation OR begin work (timesheets)
- Contact hour classes must show time in and time out on timesheets.



**Attendance  
records must  
be signed by  
the  
instructor  
who taught  
the class.**

# BLET True or False?

Sponsorship letters must be dated no later than the census date of class.

**FALSE**

Sponsorship letters must be dated within a year prior to the first day of class.



## **BLET Scenario:**

Gary Snell enrolls in a BLET class that has a census date of September 16. The attendance record indicates that Gary withdrew on September 17; yet his Course Completion Record shows that his termination date was September 13. Can the college report Gary for FTE since the attendance record shows that he withdrew after the census date?

**No.** Unlike other classes, BLET follows the code that is set by Criminal Justice Standards. Colleges need to look at the termination date on a student's course completion record when determining if a BLET student can be reported for FTE.

# Basic Law Enforcement Training

- Sponsorship Letters or Tuition Payment
  - Sponsorship letters should be legible with agency name, date, name of student and appropriate signatures and **dated on or before first day of class.**
- Final Calendar – shows completion of scheduled hours (totaled by staff daily/weekly/monthly)
- Census Date Calculation (10% of scheduled hours reported)
- Student Course Completion Records (CJ Document)
  - Withdrawal/Termination Date is the date used to determine official withdrawal from BLET.
- Instructor payment documentation for all scheduled hours

**BLET**  
**CJC 3938 / LET 3110**



Reference  
1E SBCCC 800 Waivers

# BLET Limited Enrollees

## For students with prior law enforcement education

- **Files should include:**
  - Official attendance record
    - Daily hours should be noted on the attendance record and match the final class calendar.
  - Sponsorship letters or tuition payment documentation
  - Letter from Sheriff or CJ Standards stating required coursework and hours needed
  - Student Course Completion Record from CJ Standards
  - Instructor payment for all hours reported

# BLET Supplemental Course (LET 3120)

## For currently enrolled BLET students with deficiencies in certain areas

- Available after May 2025
- May be run concurrently with current BLET section (LET 3110) outside of regularly scheduled BLET class or as a separate section after the class. No overlapping hours.
- Must be run as a contact-hour class.
- Files should include:
  - Official attendance record noting daily hours completed
  - Student fee waiver information
  - Instructor payment for all hours reported

# ISA Quiz

**TRUE**

True or False: You need to provide ALL agreements for compliance review regardless of shared hours.

How are adjustments made for shared hours on the ICR?

Add or subtract hours on the ICR for the specified course section.

# Instructional Services Agreements (ISAs)

New Terminology: Cooperative Continuing Education Agreements

Partnership  
agreements  
between colleges

Provide copies of  
**ALL** agreements  
(Levels I and II)

Provide agreement  
termination  
documentation, if  
applicable

Meet terms of  
agreement

Signed by  
appropriate staff

Documentation of  
adjustments for  
shared hours

Attendance  
records for each  
class

Reference: 1D SBCCC 300.6 Instructional Service Agreements



# Captive Co-opt Instruction

## Designate course type with a “P” or “J.”

- WCE classes offered to inmates must be State Board approved.
  - BSP and HRD classes have blanket approval.
- Can be reported as membership OR contact hours.
- Documentation of tuition payment must be provided.

## References

- N.C.G.S. 115D
- 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



# Basic Skills Plus

## References

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

- Students must be concurrently enrolled in CCR and WCE classes.
- Do not report overlapping hours between WCE class and CCR classes.
- WCE and CCR staff should communicate to ensure correct reporting of hours.
- New guidance from the System Office for Spring 2025.

# Remember

Attendance records must  
be signed by the instructor  
who taught the class.

# Instructor Responsibilities

**Certify (sign) and date the attendance record at the end of the class.**

- Review attendance roster for accuracy (schedule, student names, etc.).
- Mark attendance correctly for each student.
- 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
- Review instructional payment contract for accuracy

# ICR Adjustments

- Note adjustments in the class files and on XPA reports.
  - Be clear when noting adjustments.
- Be mindful of how you add or subtract hours on ZZZ Records.
- Adjustments may be made in the following semester.
  - It is not necessary to make adjustments Fall to Fall or Spring to Spring.
- Adjustments may not be made once the compliance review begins.

# 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.



# CCR Top Compliance Issues

## Instructor Signature

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

## Miscalculated Hours

Hours were rounded incorrectly.  
Student time was recorded on the roster incorrectly.  
Hours were reported for time outside of the scheduled class hours listed on the roster.

## Online Documentation

Total time was not calculated on the clock time software documentation. Online hours must be totaled for each student for each day.

## Instructor Payment

Instructor(s) were not paid for enough hours to cover all class hours held and reported.

# WCE Top Compliance Issues

## Instructor Signature

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

## No Indication of Attendance

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

## LMS Documentation

LMS showing online student entry was not provided, assignment was not completed or submitted, student entered before first day of class or after census.

## Scheduled Hours

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



# WCE Top Compliance Issues (continued)

## 15-year-old Students

Students under age 16 were enrolled in classes outside of approved FIP classes and were reported for FTE.

## Miscalculated Census Date

The census date for Independently Scheduled (online) classes was not calculated correctly.

## Student Payment Documentation

Documentation of third-party payment of student registration fees, such as scholarship or outside companies, was not provided.

## Third Party Instructional Pay

Documentation that third-party instructors were paid by the college was not provided in the class file.

# 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.

Review LMS documentation prior to submitting the ICR to make sure students entered prior to or on census.

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

Teach instructors how to accurately complete attendance documentation.

Use the summer to prepare your files for an upcoming compliance review.

# 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 don't know the answer,  
ASK US!**

**We want to help you!**



**NC COMMUNITY  
COLLEGES**  

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**CREATING SUCCESS**

# Lost Hours Due to Missing Instructor Signature

FY 2024-25

1

College and Career  
Readiness

**223 hours**

**0.44 FTE**

2

Workforce  
Continuing  
Education

**7,202 hours**

**14.07 FTE**

3

Curriculum

**13,280  
hours**

**25.94 FTE**

Attendance  
records must be  
signed by the  
instructor who  
taught the class.



# CONTACT US

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