

# **Compliance Services**

**Curriculum Regional Training 2025**

**Compliance Team**

**Norman Cooper, Sabra Matney, Susan Miller,  
Amanda Tolar, and Tonya Waddle**



# 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



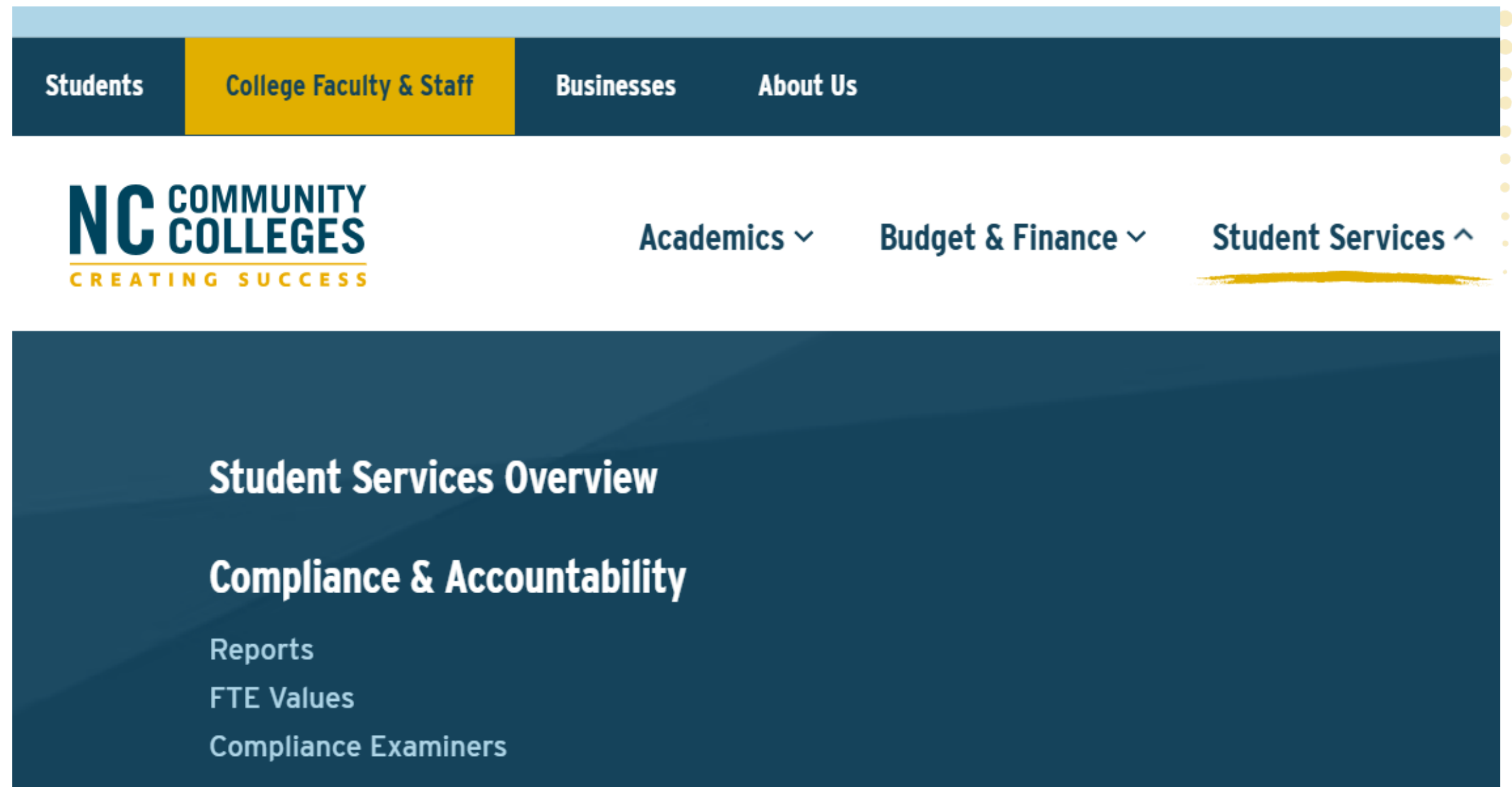
College Faculty & Staff



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**

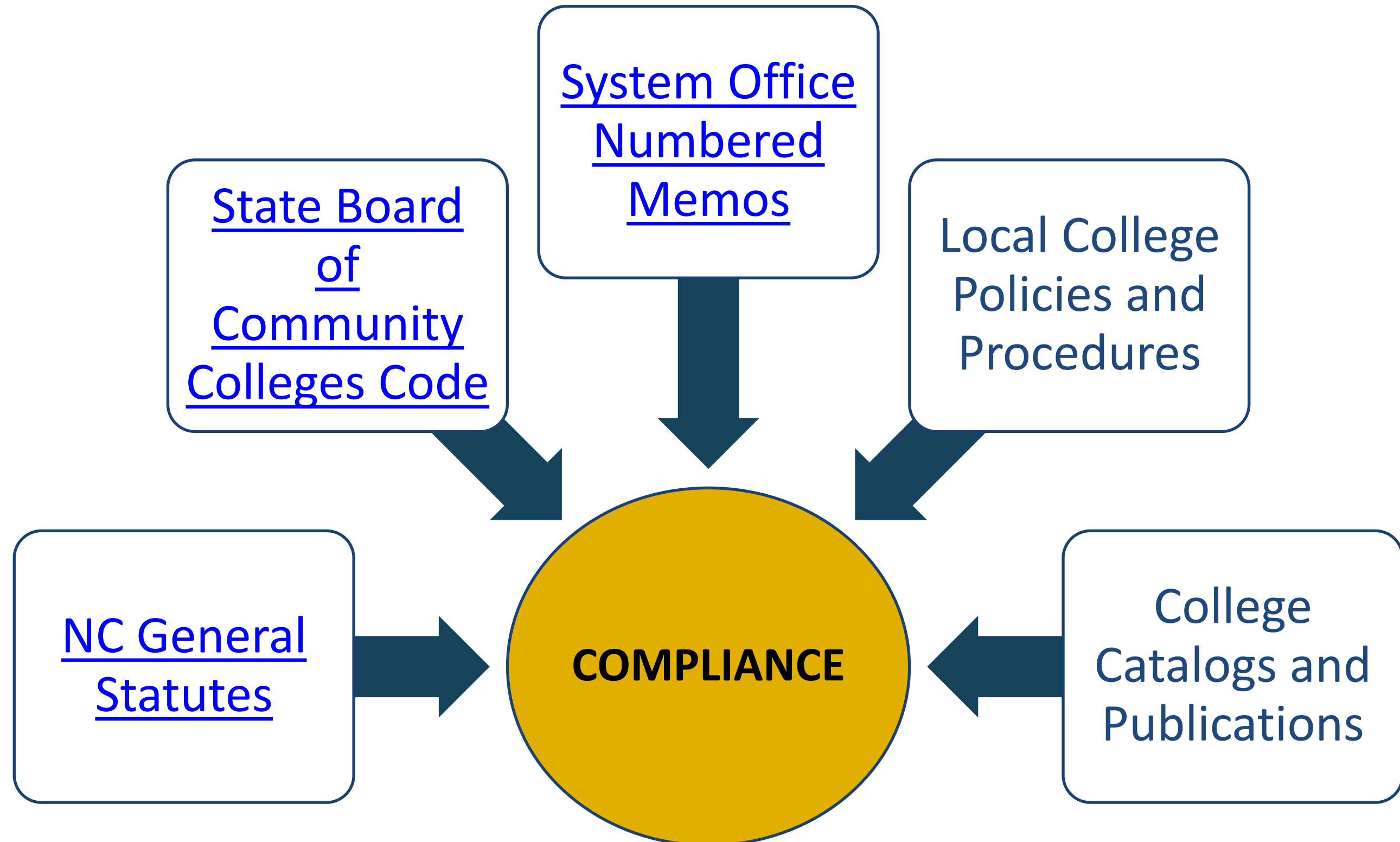
**Accountability and  
Credibility**

**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 the CCP student list and Skills Lab 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.**

# 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

## Census Date

- Consistent with SBCC Code

## Scheduled hours

- Hours consistent with CCL (Combined Course Library)

## Contact-Hour Classes

- Daily time recorded on the roster
- Time in/out documentation

## Instructor Certification

- On or after census for membership hour classes
- On or after last day of class for contact hour classes

Reference: 1G SBCCC 200.93 Reporting of Student Hours In Membership for Curriculum Classes

# Online Classes (IN)

Asynchronous  
or synchronous  
delivery

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

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

Attendance must  
be documented  
through the  
census date.

# 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 prior to or on the census date OR 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.

# 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.**

# 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

Check for overlaps between class and clinical hours

***DON'T  
FORGET!***

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



# 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**

---

# Internal Audit Reports (XPA)

1

## WBL Report XPAA

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

2

## Underage Report XPAU

Students should be coded to proper program of study and have an updated grade level.

3

## Overlap Report XPAQ

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

# Overlap Quiz

No  
adjustment  
needed.

**Scenario 1:** On the overlap report, Patrick Starr shows an overlap between PSY 150 and SOC 210. PSY 150 is a 16-week class and SOC 210 is a 2<sup>nd</sup> 8-week class. Patrick officially withdrew from PSY 150 prior to the beginning of SOC 210. Is an adjustment needed?

**Scenario 2:** On the overlap report, Pearl Krabb shows a true overlap between WLD 3106 (160 hours) and ENG 111 (48 hours). Is an adjustment needed? If so, where is the adjustment made?

Yes, an  
adjustment needs  
to be made.  
Choose the class  
with the least  
FTE.

# Student 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.

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

Remove the class hours with the lowest FTE.

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

# CCP Quiz

**FALSE**

True or False: Compliance Services requires a high school transcript for the review of selected CCP students.

For CU CCP, Compliance Services is looking for which of the following:

- A. An unofficial college transcript for each student
- B. Students did not take classes outside of their approved pathway(s)
- C. Students are in no more than 2 CCP pathways at the same time
- D. All of the above

**Answer: D. All of the above.**



# Career and College Promise

- Students cannot be enrolled in more than two pathways during a single semester – including WCE pathways. (only one CTP pathway)
- **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](#).

# 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



**If a student enters WBL through an orientation, what additional documentation must you have to report the student?**

- A. Measurable Learning Outcomes (MLOs)
- B. Employer Evaluation of Student
- C. Timesheet(s)
- D. None of the above.

**Answer: C is correct.**

# Work-Based Learning (WBL)

## Do not report students who do not start the work experience.

- 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.
  - Attend WBL orientation OR begin work (timesheets)
- Max hours = 320 (max 640 hrs for Apprenticeships)
- Contact hour classes must show time in and time out on timesheets.

## Do not report students who do not have a timesheet.

### References

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



**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.

**BLET**  
**CJC 110 / LET 110**



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



# 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 110) 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?

Create an SSS Record.

- To subtract hours, use a minus (-) sign in front of the number.
- Each ISA should be adjusted with the corresponding College ID number.

# Instructional Services Agreements (ISAs)

New Terminology: Cooperative Curriculum Agreements

Partnership  
agreements  
between colleges

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

Provide agreement  
termination  
documentation, if  
applicable

Meet terms of  
agreement

Signed by  
appropriate staff

Documentation of  
adjustments for  
shared hours (SSS)

Attendance  
records for each  
class

Reference: 1D SBCCC 400.7 Instructional Service Agreements

# Captive Co-opt Instruction

## Designate course type with a “P.”

- CU programs offered to inmates must be State Board approved.
- 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 SBCCC 200.93 Reporting of Student Hours In Membership for Curriculum Classes

# Basic Skills Plus

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

## References

- *N.C.G.S. 115D*
- 1G SBCCC 200.93 Reporting of Student Hours in Membership for Curriculum Classes
- [Basic Skills Plus Implementation Guide](#)

# Remember

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



# Academic Skills Lab

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

Report as 60-minute hours.

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

Provide instructor referral for chosen students.

Provide student class schedules (RGST) for chosen students.

Do not report overlapping hours between class and tutoring hours.



# Instructor Responsibilities

## **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

- 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

# ICR Adjustments

- Note adjustments on the attendance record 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.



# CU 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 Ps 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)

# 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**  

---

**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

**Norman Cooper**

• [coopern@nccommunitycolleges.edu](mailto:coopern@nccommunitycolleges.edu)

**Sabra Matney**

• [matneys@nccommunitycolleges.edu](mailto:matneys@nccommunitycolleges.edu)

**Susan Miller**

• [millers@nccommunitycolleges.edu](mailto:millers@nccommunitycolleges.edu)

**Amanda Tolar**

• [tolar@nccommunitycolleges.edu](mailto:tolar@nccommunitycolleges.edu)

**Tonya Waddle**

• [waddlet@nccommunitycolleges.edu](mailto:waddlet@nccommunitycolleges.edu)