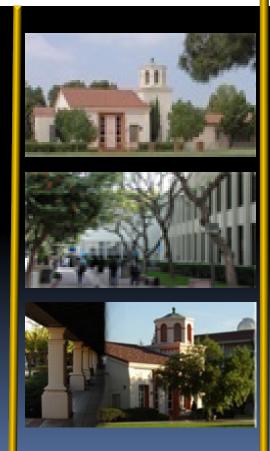
B LONG BEACH CITY COLLEGE Educate. Engage. Empower.

LONG BEACH CITY COLLEGE

TBA Compliance Training Long Beach City College

Developed & Presented by Bob Rapoza LBCCD Internal Audit Manager



What are the key points for today?

- 1. Define TBA
- 2. Discuss the compliance requirements we are facing
- 3. Explain what the auditors are inspecting
- 4. Demonstrate common problems we are experiencing with TBA courses
- 5. Clarify everyone's role in the process
- 6. Sample forms
- 7. Questions and Answers



TBA Defined

TBA Definition: Some courses with regularly scheduled hours of instruction have "hours to be arranged" (TBA) as part of the total contact hours for the course. The TBA portion of the course uses an alternate method for regularly scheduling a credit course for purposes of applying either the Weekly or Daily Census Attendance Accounting Procedures. In some situations the entire course might be on TBA. (Note: The Student Attendance Accounting Manual, page 3.3, refers to TBA hours or "hours to be arranged," which for purposes of this advisory have the same meaning as "HBA" or "hours by arrangement" or any other local term used to designate these hours.)



TBA Defined

TBA Guidelines and Information

True TBA Classes – Basic Rules	Attendance Accounting	Census Requirement	Not True TBA	
 Instructor during TBA hours meets minimum qualifications. Course Outline of Record (COR) includes specific TBA activities expected of all students. Students must be informed of TBA hours, expected outcomes, and location of where instruction during TBA hours will occur. Syllabi must contain this information. TBA hours do not take the place of homework and do not include unsupervised activities such as attendance at events, plays, and concerts. Days, time, and number of TBA hours attended by each student must be recorded and available for audit. True TBA classes are coded in PeopleSoft as 02 or 04. 	 Documentation is required to demonstrate that each student has completed the minimum number of TBA hours. Attendance records can be kept through written records, Tutor Trac, electronic record keeping, and through attendance documentation maintained offsite for clinical classes, and for public safety classes. Apportionment of TBA hours cannot be claimed for students who have recorded zero TBA hours of attendance as of the census date of the class. Weekly Census-TBA hours are scheduled for the same number of hours each week. Daily Census - TBA hours are scheduled for the same number of hours on each scheduled meeting day. Short term TBA hours are considered impractical and should be carefully considered prior to being scheduled. Irregularly scheduled TBA hours are permissible, but the entire course is subject to positive attendance requirements – even regularly scheduled face-to-face meetings. 	 Each enrolled student must demonstrate participation prior to census. True TBA classes must have auditable records of attendance. Student/Faculty contract classes must have auditable records showing the student's activities and interaction with the instructor. DE classes must have auditable records demonstrating regular and effective contact. Without documented attendance or participation prior to census, apportionment cannot be requested for students. 	 Certain classes will use the TBA meeting pattern, but they are not "true" TBA. Work Experience (coded as 20), Independent or Directed Study (coded as 05), and Field Study (coded as 20) are not true TBA classes. Positive attendance classes including ADJUS and FIRE SC should not be included as true TBA. Distance Education classes and Hybrid classes (non-regularly scheduled hours held online) should not be classified as TBA. Nursing classes which have regular class meetings for the first 8 weeks are not TBA. Classes with incidental field trips (Geology) are not TBA. 	

Office of Academic Services, March 14, 2013



TBA Defined

TBA Definition

- 1. All contact hours are on a TBA basis.
- 2. Some contact hours are on a TBA basis.
- 3. TBA hours can be on a fixed or variable basis.

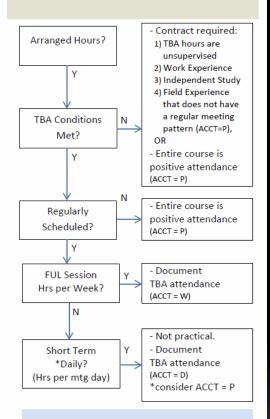
TBA Conditions - Basic Rules

- Instructor during TBA hours meets minimum qualifications.
- COR includes specific TBA activities expected of all students.
- Students must be informed of TBA hours and expected outcomes.
- Instruction must be provided during TBA hours that is not the supervision of an activity that should be done independently outside of class time.
- TBA hours do not take the place of homework and do not include unsupervised activities such as attendance at plays and concerts.
- Students must be informed of the specific location where instruction during TBA hours will occur.
- Days, times, and number of TBA hours attended by each student must be recorded and available for audit.

Attendance Accounting

- Documentation is required to demonstrate that each student has completed the minimum number of TBA hours.
- Apportionment of TBA hours cannot be claimed for students who have recorded zero TBA hours of attendance as of the census date of the class.
- ACCT = W: TBA hours are scheduled for the same number of hours each week.
- ACCT = D: TBA hours are scheduled for the same number of hours on each scheduled meeting day.
- TBA hours are impractical for most Daily Census classes. A challenge for summer classes (per CCCCO).
- ACCT = P: Where TBA hours are not regularly scheduled, attendance for the *entire course* must be recorded as Positive Attendance.

TBA Decision Tree



Caution:

TBA and ACCT = D should rarely, if ever, occur.

Classes with arranged hours not meeting TBA conditions must be ACCT = P and have attendance recorded for each class meeting including face-toface instruction.



What's not TBA?

- Positive Attendance classes
- Nursing classes which have regular class meetings for the first 9 weeks of the semester and clinical work for the second 9 weeks are not TBA. (If the class numbers for each class type (11B and 11BL are separate numbers) and if 11B and 11BL run for the same dates (same start and end dates for the 9 week period)
- ADJUS and FIRE SCI classes are also not TBA (they are positive attendance)
- Distance Education classes and Hybrid Classes, whose nonregularly scheduled hours are held online, should be referred to as DE or DL
- Classes with incidental Field Trips
- WE Classes are not TBA (MOI 20)
- Independent or Directed Study Classes
- Field Study Classes



Compliance Requirements

- Specific instructional activities expected of all students enrolled in the course are included in the official course outline.
- During TBA hours, some kind of instruction is provided and the activity must not be an activity that should be done independently outside of class time (homework). Students must still study independently outside of class time.
- A clear description of the course, including the number of TBA hours required, must be published in the official general catalog and in the official schedule of classes.
- For Weekly Census Courses, TBA is scheduled for the same number of hours each week of the term per syllabi or outline.
 For Daily Census Courses, TBA is scheduled for the same number of hours each day that TBA is scheduled. If TBA hours are not scheduled in this manner, the attendance for the entire course must be on the positive attendance basis.



Compliance Requirements

- There is attendance documentation to support claims for apportionment for TBA hours, by student.
- Colleges must not claim apportionment for TBA hours for students who have documented zero hours as of the census point for a particular course.
- An instructor who meets minimum qualifications in the discipline being taught is available and in physical proximity and range of communication to provided instruction and ensure the safety of students during TBA and may not have any other assigned duty during this instructional activity.
- Student use of college computers that is not for educational activities specified in the course outline of record and that does not require some level of interaction between the instructor and student does not qualify for TBA and may not be claimed for apportionment.

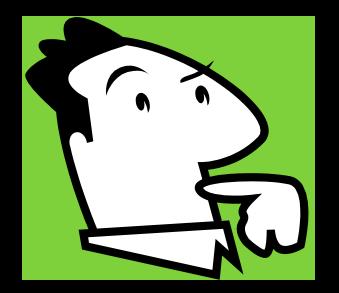


Compliance Requirements

- Pursuant to title 5, section 55002, the course outline of record shall specify the number of contact hours for the course as a whole, including contact hours related to TBA. Contact hours claimed for apportionment must be consistent with the number of contact hours specified in the course outline of record. Colleges must not claim apportionment for TBA hours for students who have documented zero hours as of the census point for a particular course.
- Where TBA involves student use of college computers or interactive multi-media equipment, some activity needs to occur which involves an instructor being present and facilitating student learning. The instructor, rather than providing direct instruction may clarify explanations and/or directions, check for understanding of concepts and provide constructive feedback.



What are The Auditors Looking for?



What do **you** think the auditors are looking for when they come? (Records, etc.)



What the Auditors are Checking

- The course outline of record
- The class schedule
- The syllabus
- Attendance records
- Apportionment claims
- Failure to properly report/support apportionment claims for TBA will result in forfeiture of FTES and will be reported as an audit finding which is presented to the BOT.



Common Problems for TBA

- Syllabi do not contain appropriate TBA information
- Syllabi are missing for certain classes
- Attendance records for classes are incomplete or do not match/support Apportionment claims
- Attendance records are missing
- Apportionment claimed for students who did not complete at least one hour of TBA meeting time prior to census



Common Problems for TBA

- Meeting patterns for TBA portion of the class do not match meeting pattern for parent section of class (WSCH, DSCH).
- There is no set schedule for students to complete the TBA portion of the class once the semester begins.
- Attendance for the TBA portion of the class is treated as open entry / open exit, but apportionment is claimed as WSCH or DSCH.



Common Problems for TBA

- No specific learning objectives are taught during TBA hours.
- An instructor who meets minimum qualifications in the discipline being taught is not in physical proximity and range of communication to provide instruction and ensure the safety of students during TBA activity.



Clarifying everyone's role in TBA

- Academic Services Working in conjunction with instructional areas, ensure that proper TBA information is present in the online course outline of record, class schedules and course catalogs. Ensure TBA information is present in our online Faculty Curriculum Reference Book.
- Deans/Department Heads Ensure attendance records are collected for all TBA classes in their area and are submitted to Admissions and Records at the end of the semester. Ensure syllabi are collected for all TBA classes in their area and keep on file for audit purposes. Ensure proper attendance applied to course (DSCH, WSCH, Positive Attendance). Ensure an instructor who meets the minimum qualifications is scheduled for each TBA session in their academic area.



Clarifying everyone's role in TBA

Faculty – Ensure syllabi contain proper TBA information and submit to Deans/Department Heads prior to start of class session. Ensure learning objectives for TBA portion of the class are established and met. Ensure attendance records are properly recorded and maintained for TBA courses (student name, date TBA hours completed and amount of time completed) and submitted to Deans/Department Head at the end of the semester. Note when a student has not completed at least one hour of TBA prior to census. For Weekly Census Courses, ensure TBA is scheduled for the same number of hours each week of the term per syllabi or outline. For Daily Census Courses, ensure TBA is scheduled for the same number of hours each day that TBA is scheduled.



Clarifying everyone's role in TBA

Admissions and Records – Keep attendance records for TBA classes on file for audit purposes. Ensure TBA information is present in the 'Opening Day Bulletin.' Institutional Effectiveness – Ensure apportionment is properly recorded / claimed based on format of TBA course. Ensure apportionment is not claimed for educational activities that does not require some level of interaction between the instructor and student. Internal Audit Manager – Ensure procedures are being followed. Serve as an intermediary with external auditors and ensure corrective action plan steps are instituted when findings arise.



Help with TBA

- TBA requirements and information can be found in the opening day bulletin.
- If applicable, TutorTrac can be used to help track attendance electronically (we can help you work with IITS to see if TutorTrac can be installed in your area if it would help).
- Academic Services in conjunction with the Internal Audit Manager have created a syllabus template which can be used by any faculty member teaching a TBA class.
- The Internal Audit Manager can be contacted as a resource regarding compliance questions (x4698), brapoza@lbcc.edu.
- TBA compliance material can be found online in the Faculty Curriculum Reference Book



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Sample Documents – Syllabus Template



INSERT COURSE TITLE COURSE NAME Semester/ Year

Instructor: Office: Class Meeting Day, Time and Location: TBA Hours - Meeting Day(s), Time(s) and Location: Office Hours: Office Phone: Email: Webpage: Units: Total TBA Hours: Instructor Supervising TBA Hours:

Course Materials:

- Required Readings/Texts
- Suggested Readings
- E-mail Account and Other Instructional Technologies
- Supplemental Instruction
- Course Packets
- Other Materials

Course Description:

- Goal/Rationale of the Course
- How the course will benefit the student and format so student understands what to expect.

Learning Objectives:

- What the students will gain from your course. Why you chose these objectives as the most important. ie. "The student willwhile in this course."
- □ TBA Hours objective(s)

Student Learning Outcomes:

□ Describe what the student will be able to do with the knowledge and skills they learned from the course. ie. "At the end of the course, you will be able to...."

Teaching Philosophy:

- What is your approach for teaching this course? What do you think students should do to best benefit from the course? Include your expected teaching methods and a statement regarding students' responsibility for their own learning.
- List out Faculty Responsibilities including what can student expect of faculty. ie. "You can expect for me to come to class on time."

Student Responsibilities:

- Participation
- Homework
- Other Expectations
- Projects, including information on group processes
- Tests/Exams
- Adhere to and complete TBA Hours and projects as assigned

В

Staff Professional Development Program

Sample Documents – TBA Attendance Record

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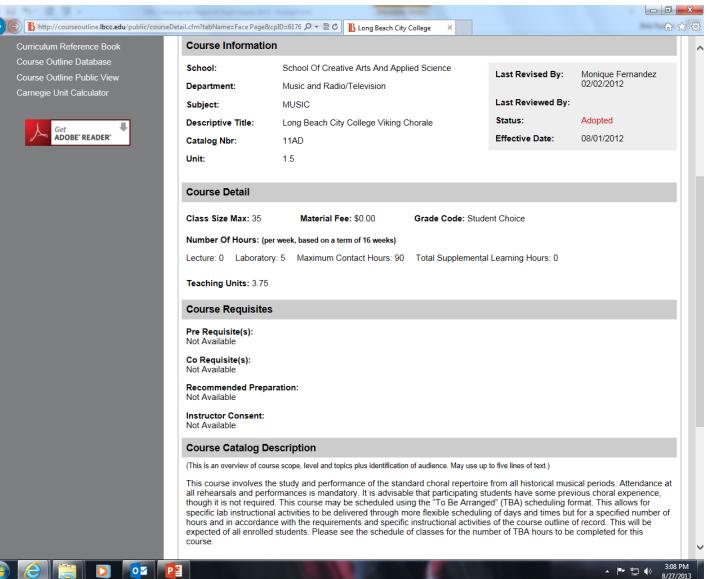
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M109 Detail Standard Report

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Sample Documents – Course Outline TBA





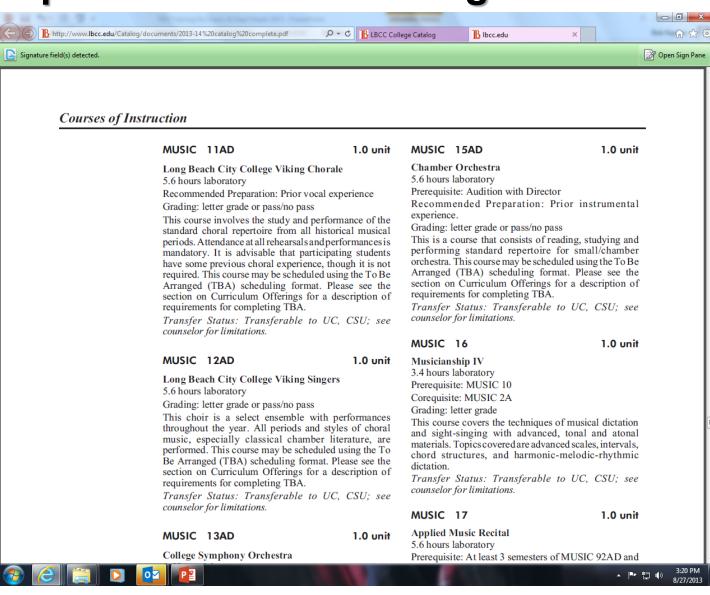
Sample Documents – Schedule of Classes TBA

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B LONG BEACH CITY COLLEGE	Schedule of Classes FALL 2013	İ
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Sample Documents – Catalog TBA





Recap

- There are specific criteria that define a course as TBA, which is simply a different delivery method for WSCH and DSCH classes.
- The Chancellor's office has stipulated compliance requirements for TBA and these are reviewed during our annual District audit.
- Failure to properly report/support apportionment claims for TBA will result in forfeiture of FTES and will be reported as an audit finding which is presented to the BOT.
- Compliance involves the participation of multiple areas of the college including Academic Services, Deans & Department Heads, Faculty, Admissions and Records, Institutional Effectiveness and the Internal Audit Manager.



Recap

- Information regarding TBA can be found in the opening day bulletin and the Faculty Curriculum Reference Book.
- The Internal Audit Manager is available to answer questions and assist with compliance matters at (562) 938-4698 and/or at brapoza@lbcc.edu.
- A syllabus template and other sample documents can be provided as examples to be followed to ensure compliance.





Questions?





Thanks for Attending! (A little auditing humor)



