



MEMORANDUM

DATE: August 3, 2000

TO: Presidents
Instructional Administrators
Deans of Continuing Education

FROM: Brenda Rogers, Vice President for Administration
Shea Henson, Director of Program Audit Services

SUBJECT: Reporting and Documenting Student Membership Hours for Distance Education Courses

The North Carolina Administrative Code, Title 23, specifies “for those classes identified as non-traditional delivery, student attendance in class or in an orientation session, submission of a written assignment or submission of an examination, is the basis for the determination of class membership at the 10 percent point of the class.” This requirement is the same for both continuing education and curriculum classes.

Recognizing, however, that some distance education classes are not time-defined, but rather operate on a self-paced and/or open-entry/open-exit basis, additional clarification for computing the 10% point is necessary. The Distance Learning Council has made the following suggestions for computing the 10% census point in distance education classes. These recommendations have been reviewed and approved by the Presidents’ Association.

- For classes which have a specific beginning date, class schedule, and ending date, computation of the 10% point should be based on the actual date at which 10% of the class time occurs. For example, for an information highway class or a telecourse with a fixed schedule, the 10% census point should be calculated in the same manner that it is computed for traditional delivery classes.
- For those classes that are operated as self-paced and/or open-entry/open-exit, the Distance Learning Council recommends that the 10% point be based on course content, rather than an arbitrary date. For example, for a class that is offered via the Internet that has an open registration period and/or is self-paced, students counted in membership must have completed at least one assignment or attended a session prior to the point where they have completed 10% of the class content. To utilize this method, the college must clearly designate the particular lesson or class assignment at which the 10% point of the class content occurs. As long as the student meets membership requirements (registration, tuition and/or fee payment, completion of an assignment or lesson) without withdrawing prior to or at the point where the 10% of the class content is delivered, the student may be counted in membership for FTE reporting purposes. Using this method, the date at which the student completed the lesson(s) is not pertinent to determining class membership eligibility. (For more information regarding class membership criteria, see 23 NCAC 2D.0323 for curriculum classes or 23 NCAC 2D.0324 for continuing education classes.)

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These options for computing the 10% census date are intended to give colleges more flexibility in determining how to offer distance education classes. Without having to assign an arbitrary census date to a self-paced or open/entry class, the college may be able to offer more flexible scheduling in some distance education classes. Colleges may decide whether it is more appropriate to base the 10% point on course length (using the 10% date) or on class content; however, the same rules should be applied consistently to similar types of classes.

It is the college's responsibility to monitor student progress and to provide documentation, for audit purposes, that students counted in membership attended a session or completed an assignment prior to or at the 10% point of the class, regardless of which method is used to determine the 10% census point. It must be clear what method was used to compute the 10% point. Documentation of class membership in distance education courses should provide a record of student participation similar to that provided by the class attendance documents for traditional delivery classes. This documentation may be maintained electronically, such as a record of emails between students and the instructor, or may be a hard copy, such as an instructor maintained attendance or student contact record. In either case, the documentation must be certified by the instructor or college staff responsible for the course and must be available for audit review. While documentation should be adequate to verify student membership and instructor certification of student participation, it is not our intent to place an unreasonable burden on the colleges for documenting student participation in distance education classes. System Office Regional Program Auditors are available to assist colleges with developing or evaluating documentation strategies for distance education courses.

If you have questions regarding the calculation of the 10% census point or specific types of suitable documentation for distance education classes, please contact your Regional Program Auditor or Shea Henson at the System Office for assistance.