



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

James C. Williamson, Ph. D.

President

March 14, 2017

MEMORANDUM

TO: Continuing Education Administrators, Continuing Education Registrars

FROM: Bryan Jenkins, Executive Director of Accountability and State Board Affairs
Margaret Roberton, Associate Vice President – Workforce Continuing Education

RE: Clarification on Limitations to Reporting Student Membership Hours

The purpose of this memo is to provide clarification of the appropriate implementation of the following State Board code: [1G SBCCC 200.95\(a\)](#) Limitations to Reporting Student Membership Hours.

- (a) *Student hours shall not be reported for budget/FTE which result from:*
 - (1) *Conferences or visits.*
 - (2) *Seminars or Meetings.*
 - (3) *Programs of a service nature rather than instructional classes.*
 - (4) *Enrollment of high school students not in compliance with 1D SBCCC 400.2 and 1D SBCCC 200.95.*
 - (5) *Unsupervised classes.*
 - (6) *Proficiency or challenge exams except that the actual time required to take the exam may be counted in membership; students shall be registered in the class consistent with Paragraph (a) of Rules 1E SBCCC 300.99 and 1E SBCCC 900.99.*
 - (7) *Homework assignments.*
 - (8) *Inter institutional or intramural sports activities including those of prison inmates.*

As referenced in this language the System Office considers the following definition as standard:

Conference: *An event generally sponsored or organized by an association or entity affiliated with a specific field or industry for the purpose of discussing or presenting new trends, information or issues relevant to the individuals within the business. A conference generally has workshop and/or breakout sessions that focus on particular topics supporting the general conference focus.*

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The System Office staff has received inquiries regarding the standard definition of “Student hours shall not be reported for budget/FTE which result from ... conferences”. Specific concerns have arisen from situations when the college is separate from the conference sponsor/organizer and is requested by or at the behest of the sponsor/organizer to provide training opportunities to conference participants.

In accordance with SBCCC language, colleges may not report for budget FTE student membership hours that are the result of a conference, seminar or meeting, regardless of whether the college or another entity sponsors/organizes the event. However, colleges may report for budget FTE student membership hours that are the result of training that is provided in parallel, but outside of the conference schedule. For the purposes of this memo, ‘outside of the conference schedule’, requires that access to college training is not contingent on registration to or participation in the conference. When a college provides such training at the request of another entity that is sponsoring/organizing the conference, colleges must ensure a transparent relationship and avoid any actual or perceived conflicts of interests. As the training providers, colleges are responsible for all aspects of the course sections offered. This includes course content (to include adoption of prescribed certification-related content, if applicable), defined student learning objectives, delivery methods, instructors, schedule, marketing and course section registration.

Colleges must maintain transparency and consistency in use of state funds for the generation of budget FTE. Pending development and adoption of new State Board codes to specifically define the parameters of third-party contract instructional relationships, ***colleges shall not enter third-party contractual relationships*** with the organizer, facilitator, association, or any third party entity acting as the financial agent on behalf of the organizer, facilitator, or association, conducting and/or sponsoring conferences, seminars, or meetings for any instructional hours to be reported for budget FTE during the timeframes of such events.

If you have questions regarding the application of this document, please contact Margaret Robertson at 919-807-7159 / robertonm@nccommunitycolleges.edu or Bryan Jenkins at 919-807-7147 / jenkinsb@nccommunitycolleges.edu.

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