
CALIFORNIA COMMUNITY COLLEGES

CONTRACTED DISTRICT AUDIT MANUAL

California Community Colleges
Chancellor's Office
2017-18



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SECTION 100
AUDIT ADMINISTRATION

110 OVERVIEW

.01 All community college districts, regional occupational centers and programs, and all other public local educational agencies are required to have an annual audit. Section 84040.5 of the Education Code requires the Board of Governors and the Department of Finance to prescribe the statements and other information to be included in the audit report filed with the state and to develop audit procedures for carrying out these audits.

.02 The Contracted District Audit Manual (CDAM) requirements apply to annual financial and compliance audits of community college districts in accordance with Education Code section 84040.5. Auditors must indicate compliance with section 84040.5 and include a summary of audit exceptions and management improvement recommendations in their report. The intent of the audits is to promote efficient and effective use of public funds for education in California by strengthening fiscal accountability at the district, county and state levels, and to encourage sound fiscal management practices among community college districts.

120 REVISIONS TO THE CONTRACTED DISTRICT AUDIT MANUAL

.01 The Chancellor's Office updates the CDAM periodically in cooperation with the Department of Finance. The CDAM changes as improved accountability methods emerge and statutes and regulations evolve. Accordingly, all users of the CDAM are encouraged to suggest changes to the California Community Colleges Chancellor's Office (Chancellor's Office).

130 ARRANGEMENT FOR AUDIT

.01 The governing board of each district is required to provide for an annual audit. Under California Code of Regulations, title 5 (Title 5) section 59102, "Arrangements for annual audits for any fiscal year as required by section 84040 of the Education code shall be made final no later than the May 1 preceding that fiscal year." Each district must inform the Chancellor's Office of their audit arrangements and identify the auditor under contract no later than May 15 of each year.

.02 In the event the governing board of a district has not provided for an audit by May 1, the California Community Colleges Board of Governors (Board of Governors) shall do so. District funds will cover the cost of such an audit.

.03 If a governing board or the Board of Governors fails or is unable to make satisfactory arrangements for the audit, the State Department of Finance shall make the arrangements. District funds will cover the cost of such an audit.

.04 All audits shall be performed by a certified public accountant licensed by the California State Board of Accountancy.

.05 Government Code section 12410.6 requires districts to change auditors every six years. For purposes of calculating the six consecutive fiscal years, audits prior to the 2013-14 fiscal year are not considered. The Controller may waive this requirement if he or she finds that another eligible public accounting firm is not available to perform the audit.

140 REPORT DUE DATE

.01 Title 5 section 59106 requires, all audit reports for the preceding fiscal year must be filed with the Chancellor's Office **no later than December 31** following the end of the audited fiscal year.

.02 There are no provisions to allow for extensions to the date required to file the annual audit reports. If an audit report will not be filed by the December 31 due date, districts must inform the Chancellor's Office. This notification should include an explanation and expected delivery date for the late audit report. District audit reports not submitted by January 31 of the subsequent fiscal year are reported to the Board of Governors at their March meeting.

.03 To assess the overall fiscal health of a district, The Chancellor's Office will consider the timeliness of audit report submissions along with the category, quantity, and magnitude of findings.

150 DISTRIBUTION OF AUDIT REPORTS

.01 The CPA firm will submit audit findings and a PDF copy of the report to the Chancellor's Office via the Audit Tracker web portal. The PDF reports provided should allow the copying of text, images, and other content.

Ensure PDF files submitted have the following security settings. This is not a request for an unprotected PDF file.

- Click on Document, select Security, select Secure this Document, select restrict opening and editing using passwords, Click on Apply, and under permissions, select Restrict editing and printing of the document.
- Enter password; select the option to allow printing in high resolution; and select the changes allowed option to none, and place a checkmark on Enable copying of text, images, and other content and then click on OK.

The CPA firm will submit copies of the annual audit report as follows:

Chancellor's Office

Submit Findings and PDF of full report via the Audit Tracker web portal:

<http://misweb.cccco.edu/AuditTracker/>

California Department of Education

Mail 2 printed copies to:

California Department of Education
Audits Investigation Division
1430 N Street; Room 5319
Sacramento, CA 95814

The State Controller's Office

Email PDF to: Trackprop55@sco.ca.gov

California Department of Social Services

Email PDF to: Sadie.Webb@DSS.ca.gov

Accrediting Commission for Community and Junior Colleges

Email PDF to: accjc@accjc.org

Federal Audit Clearinghouse

Districts expending \$750,000 or more in federal awards must conduct a single or program-specific audit per Title 2 U.S Code of Federal Regulations section 200.501(a). Submit a PDF through the Federal Audit Clearinghouse Internet Data Entry System: <https://harvester.census.gov/facweb/Default.aspx>

U.S. Department of Education

Institutions participating in federal student financial aid programs are subject to submit data from their audited financial statements and attach a PDF file of their audit report using the eZ-Audit submission system within nine months of their fiscal-year end. Additional information and submission at: <https://ezaudit.ed.gov/EZWebApp/default.do>

160 AMENDMENTS TO AUDIT REPORT

.01 When additional comments, explanations or corrections are necessary after report submission inserts or supplements should be prepared and distributed by the auditor to all holders of the report.

170 RETENTION OF AUDIT WORKING PAPERS

.01 The audit working papers are subject to review by the Chancellor's Office, the California Department of Finance, and the California State Auditor.

.02 The working papers related to the annual or other required audits should be available for review. The working papers must be available until either:

- The third July 1 succeeding the completion of the audit required by Education Code section 84040, or

- The ending date of any retention period required by any agency other than the State of California, such as the California Board of Accountancy.

180 AUDIT ASSISTANCE AND PUBLICATIONS

Assistance:

Audits of Community Colleges

California Community Colleges Chancellor's Office
College Finance and Facilities Planning Division
1102 Q Street, Suite 4400
Sacramento, CA 95811-6511
FiscalStandards@cccco.edu

Single Audit and General Questions

California Department of Finance
Office of State Audits and Evaluation
915 L Street, 6th Floor
Sacramento, CA 95814-3706
OSAEHOTLINE@dof.ca.gov

Publications:

From the Chancellor's Office

[Student Attendance Accounting Manual and Related Fiscal Advisories](#) 2001
[Student Fee Handbook](#) October 18, 2012
[California Community Colleges Budget and Accounting Manual](#) 2012
[Legal Opinions](#)
[Legal Advisories](#)

Other Legal References

[California Education Code](#)
[California Code of Regulations](#), title 5 (*see Section 230 for Audit Standards*)

SECTION 200
AUDIT ADMINISTRATION

210 OVERVIEW

.01 The auditing requirements addressed within the CDAM are directed toward those matters that may have a significant financial impact on community college operations or are perceived to have increased the risk of noncompliance with existing statutes and regulations. The audit shall concentrate on the review and evaluation of the community college district's system of internal accounting control. This includes systems established to ensure compliance with laws and regulations affecting the receipt and expenditure of State, federal, and local funds, and on those major or significant compliance objectives and audit procedures for state and federal programs identified in the CDAM.

.02 In accepting and conducting the audit, the auditor considers Interpretation 501-3, "Failure to Follow Standards and/or Procedures or Other Requirements in Governmental Audits," of the American Institute of Certified Public Accountants' Code of Professional Conduct, January 1988:

Engagements for audits of government grants, government units or other recipients of government monies typically require that such audits comply with government audit standards, guides, procedures, statutes, rules, and regulations, in addition to generally accepted auditing standards. If a member accepts such an engagement and undertakes an obligation to follow specified government audit standards, guides, procedures, statutes, rules and regulations, in addition to generally accepted auditing standards, he is obligated to follow such requirements. Failure to do so is an act discreditable to the profession in violation of Rule 501 [ET section 501.01], unless the member discloses in his report the reason for deviating from the requirements.

.03 The auditing requirements as outlined herein are **minimum requirements** to meet the State's legal requirements pertaining to financial and compliance audits of the community college districts. While there may be reasons to justify deviation from these auditing requirements, reasons for the deviation **will not** necessarily waive those auditing requirements. Any deviation must completely satisfy the State's legal requirements. If not, the CPA firm will apply additional procedures and provide a supplemental report to all report recipients.

.04 The following items represent the significant audit requirements to which the auditor must be alert in conducting the audit.

220 AUDIT SCOPE

.01 Each audit examination shall include all funds and account groups of the district, including the student financial aid funds, student body funds, cafeteria funds, and any other funds under the control or jurisdiction of the district to obtain reasonable assurance about whether the financial statements are free of material misstatement.

.02 The community college district may, at its option, contract for the audit and include additional items over and above the reporting requirements prescribed in the CDAM. At a minimum, the audit shall include those items specified in the CDAM.

.03 Each audit will also include an examination for compliance with laws, rules, and regulations as described later in this section.

230 AUDIT STANDARDS

.01 The financial and compliance audit shall be conducted in accordance with the most current standards and guidance:

- [Government Auditing Standards](#), U.S. Government Accountability Office's Generally Accepted Government Auditing Standards (GAGAS), commonly known as the "Yellow Book"
- [Electronic Code of Federal Regulations](#), Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- AICPA [Generally Accepted Audit Standards](#) and [Audit and Accounting Guides](#)
- [Governmental Accounting Standards Board Pronouncements and Implementation Guides](#)
- [Catalog of Federal Domestic Assistance](#), U.S. General Services Administration
- [Governmental Accounting, Auditing, and Financial Reporting](#), Government Finance Officers Association
- [CDAM issued by the Chancellor's Office](#)

SECTION 300
AUDIT ADMINISTRATION

310 OVERVIEW

.01 In an effort to make the results of the audit more understandable to users of the community college district audit report, the reporting requirements include several separate auditor reports. These include financial statements, compliance and internal control over financial reporting in accordance with Government Auditing Standards, federal compliance, state compliance, management letters, findings, and status of prior years' findings.

.02 Community college districts that prepare a Comprehensive Annual Financial Report (CAFR) in accordance with the Governmental Accounting Standards Board's (GASB) Statement No. 34 may submit their CAFR, including the separate auditor report on state compliance audit requirements and supplemental information to fulfill the audit reporting requirements of the CDAM.

.03 In accordance with statements issued by GASB, the districts have elected to report using the Business-Type Activities model. This reporting model does not require fund financial statements to be included with the district's annual financial report. However, some districts disclose this detail in supplemental information.

.04 Education Code 76060.5 allows for the collection of a Student Representation Fee (SRF), under certain conditions. If an SRF fee is collected, the Chancellor's Office Budget and Accounting Manual requires deposit of these fees into a separate fiduciary fund. Report these fees only under fund 72. Report fund 72 balances on the form C9CFS-311.

.05 All relevant AICPA and GASB statements and guidance should be adhered to. For additional guidance on the audit report sections and subsections, refer to the respective editions applicable to the year under audit:

- ["Codification of Statement on Auditing Standards" published by the American Institute of Certified Public Accountants](#)
- ["Codification of Governmental Accounting and Reporting Standards" published by the Governmental Accounting Standards Board](#)
- ["Government Auditing Standards" published by the Comptroller General of the United States](#)
- ["Governmental Accounting, Auditing and Financial Reporting" published by the Governmental Finance Officers Association](#)

320 REPORT COMPONENTS

.01 Auditors should consult the guidance from [AICPA](#) and [OMB](#) regarding the latest appropriate report language and illustrative report examples. For report samples, please see:

<http://www.aicpa.org/interestareas/governmentalauditquality/resources/illustrativeauditorsreports/pages/default.aspx>

At a minimum, the audit report's title page should include the district's name, college name(s), city, county and state, report title, and audit period. Arrange the report as follows:

- 1) Letter of Transmittal (Optional)
- 2) Table of Contents
- 3) District Superintendent's Message (optional)
- 4) Introduction
- 5) Independent Auditor's Report
- 6) Management's Discussion and Analysis (MD&A)
- 7) Basic Financial Statements
- 8) Notes to Financial Statements
- 9) Required Supplementary Information
- 10) Auditor's Report on Information Accompanying the Basic Financial Statements (Supplemental Information) – May be added to the auditor report on the basic financial statements or may appear separately in the auditor-submitted document.
- 11) Supplementary Information
- 12) Notes to Supplementary Information
- 13) Independent Auditor's Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with Government Auditing Standards
- 14) Independent Auditor's Report on Compliance with Requirements That Could Have a Direct and Material Effect on Each Major Program and on Internal Control Over Compliance
- 15) Independent Auditor's Report on State Compliance
- 16) Summary of Auditor's Results
- 17) Schedule of Findings and Questioned Costs
- 18) Management Letters
- 19) Status of Prior-Year Findings and Recommendations

.02 Schedules: The needs and requirements of the California Community Colleges will dictate the level of accounting shown in the schedules. Schedules are used to demonstrate finance-related legal and contractual compliance (e.g., where bond indentures require specific data to be presented) and to present other information deemed useful (e.g., data related to annual FTES calculations, such as the Schedule of workload measures for State General Apportionment). Determination of the appropriate level of detail as to presentation in a schedule is a matter of professional judgment.

.03 Financial Statement Notes on Net Pension Liability: State Teachers' Retirement System (STRS) Retirement Incentive Program:

Per Education Code 84040.5(c), community college districts that have participated in the STRS Retirement Incentive Program must include information

regarding the program in their annual audits. Disclose this information in the notes to the financial statements and include the following:

- The number and type of positions vacated.
- The age and service credit of the retirees receiving the additional credit.
- A comparison of the salary and benefits of each retiree receiving the additional service credit with the salary and benefits of the replacement employee, if any.
- The resulting retirement costs, including interest (if any), and the postretirement healthcare benefits costs, incurred by the district.

See [APPENDIX A Sample Financial Statement Note for Early Retirement Incentive Program](#)

330 AUDITOR'S REPORT ON SUPPLEMENTAL INFORMATION

.01 The auditor report on the examination of the supplemental information shall be included in this section of the report. Findings and recommendations are to be included in the Findings and Recommendations section of this report. It is acceptable to present this information in the report on the basic financial statements or it may appear separately in the auditor-submitted document.

340 REQUIRED SUPPLEMENTAL INFORMATION

.01 Current required reporting of supplemental information consists of:

- 1) Schedule of Other Post-Employment Benefits (OPEB) Funding Progress
See [APPENDIX B](#)
- 2) Schedule of District's Proportional Share of the Net Pension Liability
- 3) Schedule of District Contributions
- 4) Schedule of District Organization, Board and Administration Members
See [APPENDIX C](#)
- 5) Schedule of Expenditures of Federal Awards
See [APPENDIX D](#)
- 6) Schedule of Expenditures of State Financial Awards
See [APPENDIX E](#)
- 7) Schedule of workload measures for **State General Apportionment**
See [APPENDIX F](#)
- 8) Reconciliation of Annual Financial and Budget Report to audited financial statements
See [APPENDIX G](#)
- 9) Reconciliation of the 50 Percent Law calculation to audited financial statements
See [APPENDIX H](#)
- 10) Reconciliation of Education Protection Account expenditures to audited financial statements

See [APPENDIX I](#)

- 11) Reconciliation of governmental funds to the statement of net position.
See the options listed on pages 6-12 and 6-13 of the Budget and Accounting Manual ([BAM](#)) for your options in presenting this data.
- 12) Notes to the supplemental information
See [APPENDIX J](#)

.02 The Schedule of Expenditures of Federal Awards is to include the name of the subrecipient(s) receiving federal financial awards for federal record keeping purposes. Sub recipients may include individual colleges of a district depending on program factors. For guidance on determining whether an entity is a subrecipient, see the [Code of Federal Regulations Title 29 section 99.210](#).

See [APPENDIX D Sample Schedule of Expenditures of Federal Awards](#)

350 AUDITOR'S REPORT ON STATE COMPLIANCE

.01 A separate auditor report shall be prepared for the examination of state compliance requirements. The report shall contain an expression of positive assurance with respect to compliance with applicable laws and regulations for those items tested in accordance with the CDAM, and negative assurance for untested items. **Instances of noncompliance with applicable state compliance requirements must be reported in terms of the items or monetary amounts questioned, if any, regardless of the significance, individually or collectively.** The report shall contain specific recommendations for corrective action and, if available, the community college district's response to the audit report shall be included in the audit report. **Additionally, include the number of FTES claimed for any cited instructional activity or conditions that affect the FTES claimed by the district for state general apportionment.**

.02 Findings related to compliance requirements may affect the auditor opinion report on the financial condition of the community college district. Evaluate findings as to their effects, if any, upon the district's financial statements and supplemental information.

360 FINDINGS, QUESTIONED COSTS, AND RECOMMENDATIONS

.01 The findings, questioned costs, and recommendations will include matters dealing with internal control, compliance, and supplemental information. Explain each finding in sufficient detail to enable the reader to understand the criteria, condition, effect, questioned costs, recommendations, and response. Where applicable, clarify the effect of any internal control weakness or condition of noncompliance on reports or schedules. Findings should also identify repeat findings from the previous year's audit report. Present recommendations in a manner that will illustrate how corrective action will eliminate the weakness or provide compliance.

.02 For State compliance findings, name the finding the same as the number and name of the CDAM procedure.

.03 This section should also include a “Summary of Auditors’ Results. All reportable findings, recommendations, and responses shall be included in the audit report.

See [APPENDIX K Sample Schedule of Findings and Questioned Costs](#)

370 STATUS OF PRIOR-YEAR FINDINGS AND RECOMMENDATIONS

.01 This section shall include the status of district actions on findings and recommendations reported in the prior-year audit. Any reference to prior-year findings and recommendations shall include the identification references used by the Chancellor’s Office during its follow-up activities.

See [APPENDIX L Sample Summary Schedule of Prior Audit Findings](#)

380 MANAGEMENT LETTERS

.01 A copy of each management letter issued during the audit shall accompany the audit report submitted to the Chancellor’s Office.

SECTION 400
STATE COMPLIANCE REQUIREMENTS

410 OVERVIEW

.01 Community colleges are required to report on compliance aspects of significant state and federal programs. At a minimum, the auditor should perform all state compliance tests outlined in the remainder of this section and report any instances of noncompliance.

.04 All state compliance tests that may affect the calculation of FTES or Students Served for funding from the state must be performed using current sample size guidance provided by professional auditing standards for tests of compliance. If findings from these tests do not provide information as directed below, the Chancellor's Office will consider the audit report incomplete and rejected until amended.

Some transactions testing within this state compliance test require using a statistically significant sample where results may affect State funding. Extrapolation of sample results to the full population of transactions is required regardless of funding levels. Take a stratified sample as needed, as it will assist the accuracy of the extrapolation.

The Chancellor's Office will calculate the questioned dollar amount using the questioned FTES or students served information provided by the auditor.

Report questioned FTES and students served information as Credit, Noncredit, or Noncredit CDCP, and specify each Center and Campus. Per Title 5 section 58012, calculations must be to four decimal places and displayed rounded to two.

Include the source of your sample in your finding. For instance, did you test data found on the P1, P2, Annual, or Recal report? Report the quantity of sample transactions tested from each College, Campus, or Center.

If the district corrects the auditor-identified discrepancy, state which report identifies the audit correction (P1, P2, Annual, or Recal report). Corrections sent to the Chancellor's Office on any report must be specifically identified as resulting from a specific audit finding number to be considered resolved. If the Chancellor's Office is not able to identify the correction specifically, our office will make the correction.

Perform a 100% review of the full population of transactions tested that resulted in the finding in place of extrapolating any findings related to State funding. The CPA firm must oversee and certify the results of the review. Report review results to the Chancellor's Office whether they increase or decrease the audit sample results.

.05 The auditor should use professional judgment and due diligence in designing the types of compliance tests to perform. Tailor the audit procedures to individual programs and circumstances. The auditor should also determine the current requirements governing the program by reviewing California Education Code, California Code of

Regulations, Title 5 provisions of contracts and grant agreements, and specific program guidance.

.06 It is ideal to complete apportionment related audit tests early in the audit cycle. Audit adjustments included on the Recal CCFS-320, allow districts to receive the highest possible funding level. State within the finding whether the Recal Apportionment Attendance Report (CCFS-320) includes an audit related adjustment. Confirm this information within the management response/corrective action plan.

The Recal CCFS-320 detail information should also specifically identify the audit adjustment(s). If State apportionment related audit tests are not completed in time to make corrections on the Recal CCFS-320, Chancellor's Office staff will consider the audit results when preparing the final recalculation of state apportionments. Apportionment adjustments depend on each district's unique funding scenario.

.07 For State compliance findings, title the finding in the audit report the same as the test number and name. For example, if a finding is noted related to salaries of classroom instructors, the finding title is "421- SALARIES OF CLASSROOM INSTRUCTORS (50 PERCENT LAW)".

.08 Districts may elect a mandated block grant (MBG). The auditor needs only to verify that the district provides at least one of the mandated activities. Revenue from the MBG is unrestricted.

421 SALARIES OF CLASSROOM INSTRUCTORS (50 PERCENT LAW)

.01 Background

Districts must expend a minimum of 50 percent of the Current Expense of Education (CEE) during each fiscal year for “Salaries of Classroom Instructors” per Education Code section 84362, commonly known as the 50 Percent Law. Salaries of classroom instructors, per Title 5 section 59204, is:

- (1) “that portion of salaries paid for purposes of instruction of students by full-time and part-time instructors employed by a district; and
- (2) All salaries paid to classified district employees who are
 - (a) assigned the basic title of “Instructional Aide” or other appropriate title designated by the governing board that denotes that the employees’ duties include instructional tasks, and
 - (b) employed to assist instructors in the performance of their duties, in the supervision of students, and in the performance of instructional tasks.” An employee is under the supervision of an instructor for the purpose of Education Code section 84362 if the employee performs duties under the general direction of an instructor.

In addition, salaries of classroom instructors shall include the proportionate share of all benefits provided to these instructors and instructional aides (object of expenditure code 3000, as defined in the [California Community College Budget and Accounting Manual, 2012 edition](#)).

CEE includes objects of expenditures 1000 through 5000 and Equipment – Replacement for activities 0100 through 6700 in the General Fund, Unrestricted sub fund as defined in the Chancellor’s Office Budget and Accounting Manual, 2012 edition, less expenditures for activity 64XX, Other Student Services – Other (student transportation) and amounts expended for lease of plant and equipment. In-kind match will not be included in the district’s accounting system and is, therefore, not part of this calculation.

Areas in which questions of compliance have arisen are:

- 1) Inclusion in “Salaries of Classroom Instructors” (SCI) of:
 - a. Instructional aides’ salaries and benefits.
 - b. Proration of salaries and benefits for administrative staff who teach part time.
 - c. Instructors’ “reassigned time” for administrative purposes is not included in SCI.
 - d. Salaries of “Contract Instructors” and proration of these salaries and benefits for the “Contract Instructors” that teach part time.
- 2) Exclusion from CEE of:

- a. Capital Outlay Expenditures: Equipment – Additional
 - b. Expenditure of state and federal categorical moneys
 - c. Expenditure of State Lottery Proceeds
 - d. Proration of salaries and benefits of staff working on activities outside of the CEE
- 3) Inclusion in CEE of:
- a. Local match for categorical programs except those expenditures appropriately reflected in other funds.
 - b. Expenditures for Equipment – Replacement

.02 Criteria

- [Education Code](#) section 84362 and 88242
- [California Code of Regulations, title 5](#), section 59204 and 59206
- [Government Code](#), section 8880.5(b) and (k), specifies community college districts, as a condition for receiving lottery funds shall establish a separate account for the receipt and expenditure of those funds.
- Chancellor’s Office [Legal Opinion O 00-14](#), “Salaries of Classroom Instructors” Contained in Education Code sections 84362, the “Fifty Percent Law”, dated June 12, 2000
- Chancellor’s Office [Legal Opinion O 04-10](#), District Ability to Count Amounts Paid to Outside Agencies as “Salaries of Classroom Instructors” under 50% Law
- [Chancellor’s Office Budget and Accounting Manual, 2012 edition](#)
- [Form CCFS-311, Supplemental Data, Analysis of Compliance with 50 Percent Law Report and Instructions](#) (Completed report should be obtained from district)

.03 Compliance Requirement

Auditors may test all criteria above.

Each district’s salaries of classroom instructors shall equal or exceed 50 percent of the district’s current expense of education in accordance with Education Code section 84362. **A significant deficiency exists if the district does not meet the 50 percent minimum.**

.04 Suggested Audit Procedures

- 1) Test a sample of the personnel duty statements from the personnel records of classified employees (instructional aides) whose salaries and benefits are included in instructor salaries and determine whether such employees have the basic title of “Instructional Aide” or other appropriate title with the specification to assist instructors in instructional tasks as part of their duties. **(Verify proper job classification assigned.)** Determine whether the basis for allocated salaries and benefits is reasonable.
- 2) Test documentation for a sample of administrative staff salaries and benefits allocated to “Salaries of Classroom Instructors” and determine whether the portion of time devoted to instruction of students in the classroom is reasonable. Determine whether the basis for the allocation is reasonable.

- 3) Test a sample of instructors that have non-instructional assignments or that are on reassigned time for administrative purposes and verify that the appropriate allocation of salaries and benefits for these individuals is not included in SCI. See Chancellor's Office Legal Opinion O 00-14, "Salaries of Classroom Instructors" contained in Education Code section 84362, and the "Fifty Percent Law", dated June 12, 2000.
- 4) Select and test a sample of previously untested instructors included in SCI to determine that all such instructors are in positions requiring minimum qualifications and that the salaries reported as SCI for those instructors correspond to actual instructional duties required of him or her. If allocated amounts include excluded amounts without the use of a job cost system, determine that the allocation basis is appropriate.
- 5) Test a sample of expenditures for object 6400, Capital Outlay, Equipment. Examine supporting documentation to determine whether the sample expenditures are in the proper subsidiary account, i.e. additional equipment or replacement equipment. Expenditures for Equipment–Replacement should be included in CEE, but exclude those for Equipment–Additional. Replacement equipment is a substitute, or exchange, of an asset for another asset of like kind. It does not extend the asset's life but rather maintains the service level anticipated from the original asset. Additional equipment extends the useful life of an asset, improves the asset's performance, or increases the value of the asset; it is not equipment previously owned (not a substitute for previously owned equipment.)
- 6) Test a sample of state and federal categorical program expenditures from the following programs to determine that they have been excluded from the CEE:
 - a. Disabled Student Programs & Services (DSPS)
 - b. Extended Opportunity Programs & Services (EOPS)
 - c. College Work Study, Vocational Education Technology Act (VTEA)
 - d. Workforce Investment Act (WIA), etc.
- 7) Exclude district lottery funds from the 50 percent law calculation. In order to verify the proper treatment of lottery funds in the 50 percent law calculation, the district should have established a separate account/sub fund to account for the receipt and expenditure of lottery funds in accordance with Government Code, section 8880.5(k). Lack of a separate lottery funds account/sub fund will again result in a recordkeeping finding.
- 8) Determine whether local matching funds for the above categorical programs/projects have been included in the General Fund's unrestricted sub fund and are thus included in CEE. Items properly excluded from the General Fund Unrestricted sub fund include but are not limited to capital outlay items properly accounted for in the Capital Outlay Projects Fund, financial aid payments made in the Financial Aid Fund, and child development activities properly accounted for in the Child Development Fund.
- 9) Select line items from the CCFS-311 titled "Analysis of compliance with the 50 Percent Law (ECS 84362)" as prepared by the district and trace to financial supporting documentation. Test the numerator and denominator and

recalculate percentage. Verify that excluded items were included in the expenditures listed on page one of the report.

- 10) Report any audit adjustments on the "Reconciliation of ECS 84362 (50 percent Law) Calculation" form in the supplementary materials in the Appendix. Complete this reconciliation form with the annual reported data from the CCFS-311 even if there are no adjustments.

423 APPORTIONMENT FOR INSTRUCTIONAL SERVICE AGREEMENTS/CONTRACTS

.01 Background

A number of community colleges have instructional arrangements, commonly referred to as "instructional service agreements" (ISA), with public and private entities. ISAs are different from contract education. In contract education, the college sends its instructors to provide courses or training to meet the specific needs of the contracting entity. The contracted course or training need not be open to all admitted students, the contractor pays the full cost of instruction and the district does not receive apportionment.

Although ISAs are offered pursuant to an agreement with a third party, they are significantly different from the type of contract education described above because they must be open for the enrollment of all admitted students who meet established enrollment prerequisites. Because instruction offered under an ISA is eligible for apportionment, numerous standards for the conduct of ISA courses apply. Employees of the contracting party are often the teacher because they may have special expertise. The employees of the contractor are considered district employees for purposes of satisfying the employment standards for apportionment when meeting certain conditions, including as prescribed by California Code of Regulations, title 5 section 58058.

ISAs are often mutually beneficial because of the shared instructional costs. Individuals with special expertise instruct the courses, and colleges frequently claim state apportionment. Questions arise as to whether districts have been fulfilling the requirements in order to claim apportionment for student attendance in courses offered under ISAs.

.02 Criteria

- 1) [Education Code](#), section 84752
- 2) [California Code of Regulations, title 5](#), sections 58012, 58050, 58051(a) (1), (c)-(g), 58051.5, 58055, 58056, 58058(b), 58060, 58102-58106, 59114, and 59116.
- 3) [Student Attendance Accounting Manual and related advisories](#) (including the "Addendum Concerning Academic Calendars, Course Scheduling, and Related Topics")

- 4) [Accounting Advisory FS 05-02](#), Revision of annual CCFS 311 Fifty Percent Law page to accommodate instructional salary expenditures for Instructional Service Agreements.
- 5) [Instructional Services Agreement Guidelines for Community College Districts and Public Agencies 2015](#)

.03 Compliance Requirement

Auditors may test all criteria above.

This compliance requirement applies to ISAs in which a district has an agreement with a contractor to instruct classes and:

- 1) The contractor's employees are used to instruct classes, and
- 2) The district is compensating the contractor or the instructor, and
- 3) The district is reporting the FTES from these classes for purposes of claiming state apportionment funding.

Community colleges may claim FTES for classes conducted on campus or at a contractor's site and instructed by the contractor's employees. In order for these FTES to be eligible for state funding, the following regulatory requirements apply:

- 1) Programs must be approved by the Chancellor's Office and courses must be part of those approved programs or the college must have received delegated authority to separately approve those courses.
- 2) Courses must be open to all admitted students who meet any approved prerequisites for the courses.
- 3) Instruction is under the immediate supervision and control of an employee of the district.
- 4) The district employee must possess valid credentials or meet the minimum qualifications required for the assignment.
- 5) Where the instructor is not a paid employee of the district, the college or district has a written agreement or contract with each instructor conducting instruction. Such written agreement or contract shall state that the college or district has the primary right to control and direct the instructional activities of the instructor (Title 5 section 58058).
- 6) The district and public or private agency, individual, or group of individuals with whom the district has an instructional services agreement may not receive full compensation for the direct education costs for the conduct of the class from any other source.
- 7) For all courses conducted under an instructional services agreement, including those pursuant to Title 5 section 58058, determine whether the district received certification verifying that other sources are not fully funding the instructional activity conducted in accordance with Title 5 section 58051.5.

.04 Suggested Audit Procedures

- 1) Determine whether the college or district offers instruction under any ISAs. The instructional services agreements may be referred to by different names, including “memoranda of understanding”, “instructional contracts”, or “instructional agreements”, etc.
 - Another indicator that a district has ISAs is if the district reported Object Code 5000 -Other Operating Expenses (line EDP 449, Column 1) on their CCFS-311, Analysis of Compliance with 50 Percent Law report. Report only ISA direct instructional costs in that line item.
- 2) Determine if the district reports FTES for these classes.
- 3) Select a representative sample from the above ISAs to include those generating the largest number of FTES and verify that:
 - a. For agreements using employees of the contracting entity, the college or district has a written agreement or contract with each instructor conducting instruction for which it is claiming FTES. The contracts must state that the college or district has the primary right to control and direct the instructional activities of the instructor. The contract between the college or district and the instructor must be finalized and in effect prior to the commencement of instruction.
 - b. The written agreement with the contractor states the responsibilities of each party and that the college or district is responsible for the educational programs conducted under the agreement.
 - c. The courses are part of an approved program or a stand-alone course approved by the college through its delegated authority.
 - d. The courses are open to all admitted students who meet approved prerequisites for the course as published in the official general college catalog and/or the schedules of classes and/or addenda.
 - e. The minimum qualifications for instructors teaching these courses are consistent with instructor qualifications for other similar courses given at the college or district.
 - f. The instructors meet the minimum qualifications for the courses that they teach. Satisfaction of minimum qualifications is present when a person has a valid, unrevoked credential or meets minimum qualifications adopted by the Board of Governors for the particular discipline. (Title 5 section 58060, and 53400 et. seq.)
 - g. The college or district exercises control and supervision over the educational program(s). This may be demonstrated by a variety of activities, including instructor orientation and training, ongoing communications with instructors (i.e. memos, faculty manuals, and on-site supervision), and course and instructor evaluations. **(Activities should be consistent with those the college or district performs for instructional activities taught by a paid part-time instructor on campus).**
 - h. The college and/or district certifies it did not receive full compensation for the direct education costs of the class from any public or private agency, individual, or group of individuals.

- i. The public or private agency, individual, or group of individuals with whom the district has a contract and/or instructional agreement did not receive full compensation from another source for the direct education costs for the conduct of the class.
 - j. When claiming classes for apportionment purposes not fully funded under contracts described in item i, the district must require the contracting entity to certify that the direct education costs of the activity are not now and are not going to be funded through other sources.
- 4) A **significant deficiency** may also exist if the college or district lacks the appropriate documentation to support the following:
- a. Appropriate ISAs exist per the Instructional Services Agreement Guidelines for Community College Districts and Public Agencies 2015
 - b. The educational program is under the control and direction of the college or district
 - c. Written contracts or agreements with each instructor conducting instruction for which FTES are to be reported and must state that the college or district has the primary right to control and direct the instructional activities of the instructor
 - d. The classes are open to all admitted students who meet approved prerequisites,
 - e. The instructors meet minimum qualifications
 - f. Either the course is part of a program approved by the Chancellor's Office, or the college has received delegated authority to separately approve those courses
 - g. The district has failed to obtain the required certifications described in item 3j above.

Additionally, include the number of FTES claimed for the instructional activity included in any conditions cited.

424 STATE GENERAL APPORTIONMENT FUNDING SYSTEM

.01 Background

Program based funding was replaced with the SB 361 (2006, Scott) funding model. Workload measures and related testing changed as a result.

Full-Time Equivalent Student (FTES), credit, noncredit, and noncredit CDCP, are the workload measures for the SB 361 funding model.

Title 5 sections 58020-24, continues to require the district to maintain detailed documentation to substantiate the data reported on the CCFS-320. Each district governing board is required to adopt procedures to document all course enrollment, attendance and disenrollment as required by Title 5 sections 58020-58024.

Pursuant to title 5, section 58030, these procedures shall include rules for retention of support documentation that would enable independent determination of the accuracy of

data submitted by the district as a basis for state support. Consider internal controls when developing procedures. Suggested information to supplement the documentation of each course may include, but is not necessarily limited to the items below:

- 1) The signature of the instructor on all primary attendance accounting documents as a certification of a true and accurate accounting. This includes online or electronically submitted documents where instructors affirm or certify a written statement on the electronic class roster. Certification statements say all inactive students, as defined by California Code of Regulations, title 5 section 58004 and local board adopted procedures, have been dropped on the class roster as of the census date or that positive attendance hours are based upon an accurate count of students present at each course meeting, and
- 2) Any pertinent information concerning courses that have atypical characteristics or requirements (e.g., lab hours, hours to be arranged [TBA], intercollegiate athletics, field trips).

The evaluation of required documentation concerns not only the test of the validity of the information documented, but also of the system used to generate that information. For districts that have converted to online or electronic submission of census or positive attendance class rosters, it is important to confirm that sound security and accountability measures have been integrated into those processes (e.g., password based, internal controls, regular quality reviews of output data, and secure retention of records, either physical or electronic, that document each transaction). The burden is on the district to develop a system and related procedures that are consistent with applicable California Code of Regulations, title 5 requirements, including those provided by sections 58000, 58004, and 58030.

.02 Criteria

- 1) [Education Code](#) section 8152
- 2) [California Code of Regulations, title 5](#), section 58003.1, 58003.4, 58004, 58012, 58020, 58022, 58024, 58030, 58051(c)-(g), 58770, 58771, 58773, 58774, 58776, 58777, 58779, 58785, 84750.5, 84760.5, 59114, and 59116
- 3) [Student Attendance Accounting Manual and related advisories](#) (including the “Addendum Concerning Academic Calendars, Course Scheduling, and Related Topics”)
- 4) [Distance Education Guidelines](#) (includes the 2008 Omnibus Version), which provide updated guidance on attendance accounting for distance education courses and the “Alternative Attendance Accounting Procedure,” formerly referred to as “Independent Study/Work Experience Attendance Accounting Procedure.”
- 5) Governing board-approved procedures adopted pursuant to California Code of Regulations, title 5 sections 58004(c) and 58030 for documenting course

enrollment, attendance, and disenrollment. Obtain these procedures from the district being audited.

- 6) [Term Length Multipliers for fiscal year under audit](#)
- 7) [CCFS-320 – CATALOG HOURS vs. SCHEDULE HOURS](#)
- 8) [CCC Contact Hours Chart for the calculation of contact hours in five-minute increments](#)
- 9) [Labor Code](#), section 3074
- 10) [Attributes of a Distance Education Credit Course on Weekly, Daily, or Positive Attendance Procedures](#)
- 11) Chancellor's Office list of active and inactive course approvals
<https://coci2.ccctechcenter.org/courses>

.03 Compliance Requirements

Auditors may test all criteria above.

Auditors must test FTES calculations for the Annual CCFS-320 every year.

See the five types of FTES calculations available in a-e under number 3 below. Identify each type of FTES calculation in use at the district or campus under audit. Test courses reported using each accounting procedure used at the district under audit using a statistically significant sample. Use a stratified sample as needed for each type of course to assist with extrapolation of findings that include questioned FTES. Take a statistical sample from each stratified population so that you can confidently extrapolate your results from the samples to the populations of each type of FTES in use at the district or campus. The Chancellor's Office will use the total FTES number provided in the audit report to calculate a dollar amount related to this test.

Auditors must extrapolate FTES results to the entire population of each attendance procedure tested.

Testing will trace records to detail (source) documents, not summary documents.

.04 Suggested Audit Procedures

- 1) Verify that the district maintains and follows required governing board adopted procedures and that those procedures are in accordance with applicable California Code of Regulations, title 5 and Student Attendance Accounting Manual (SAAM) requirements:
 - a. Pursuant to California Code of Regulations, title 5 section 58030, each district governing board is required to adopt procedures for course enrollment, attendance, and disenrollment documentation, including rules for retention of support documentation, which would enable independent determination regarding accuracy of data submitted by the district as a

basis for state support. Adopted procedures shall be so structured as to provide for adequate internal controls.

- b. Pursuant to California Code of Regulations, title 5 section 58004(c), each district is required to adopt procedures for the clearing of inactive enrollment in census-based courses. Refer to California Code of Regulations, title 5 section 58004 and SAAM for rules on clearing class rolls of inactive enrollment.
- 2) Verify that required tabulations are maintained for each course section and that attendance records are retained by the district for the required retention period:
 - a. Pursuant to California Code of Regulations, title 5 section 58020 et seq., a separate tabulation is required for each course section. Requirements vary for the various course categories (e.g., Weekly Census courses, Daily Census courses, Actual Hours of Attendance courses). Refer to California Code of Regulations, title 5 section 58020 et seq. and the SAAM for specific requirements for each course category.
 - b. Pursuant to California Code of Regulations, title 5 section 59025, records relating to attendance and FTES are Class 3-Disposable Records and records basic to audit. The district must retain these records for the minimum applicable 3-year record retention period required by California Code of Regulations, title 5 section 59026(b) and the SAAM.
 - 3) Verify that the district uses the appropriate attendance accounting procedure for courses reported for apportionment in accordance with California Code of Regulations, title 5 section 58003.1 et seq. and accurately reports the contact hours for classes in each procedure:
 - a. Courses reported under the **Weekly Student Contact Hour Procedure** (Weekly Census) must possess the following attributes:
 - i. Credit course offered during a primary term (a semester for semester-system colleges or a quarter for quarter-system colleges)
 - ii. The course is coterminous with the primary term.
 1. Course must begin when the term begins and end when the term ends, and must be scheduled to meet regularly during each instructional week of the term, exclusive of final examination scheduling.
 2. There must be at least three days of instruction and/or examination during each week of the primary term.
 - iii. FTES computation must apply the State-established Term Length Multiplier for the particular college as listed in the Criteria section above.

The course meets regularly with respect to the number of days of the week and the number of hours the course meets each week (including TBA hours). The weekly student contact hours reported for each class reported under the Weekly Student Contact Hour Procedure should be the product of the number of

students actively enrolled at census times the total scheduled weekly contact hours of the class, including TBA hours).

- b. Courses reported under the **Daily Student Contact Hour Procedure** (Daily Census) must possess the following attributes:
 - i. Credit course scheduled to meet for five or more days
 - ii. The course must be scheduled regularly with respect to the number of hours during each scheduled day, but not be scheduled coterminously with the primary term (can be offered during any term or intersession). For example, 6- or 8-week courses offered during a primary term, or during a summer or winter intersession.
 - iii. FTES calculation must apply the correct course length multiplier (the number of days the course is scheduled to meet; holidays are not counted)
 - iv. TBA hours per week cannot be a part of a Daily Census class schedule. A Daily Census course must meet the same number of hours each day it meets.

The total student contact hours reported for each class reported under the Daily Student Contact Hour procedure should be the product of the number of students actively enrolled at census times the scheduled daily contact hours of the class, times the number of scheduled meetings of the class. Do not count holidays.

- c. The **Actual Hours of Attendance Procedure** (commonly referred to as Positive Attendance) is based on an actual count of enrolled students present at each class meeting and applies to the following types of courses, among others:
 - i. Short-term credit courses scheduled to meet fewer than five days
 - ii. Credit courses scheduled irregularly with respect to the number of days of the week and the number of hours the course meets on the scheduled days
 - iii. All open entry/open exit courses
 - iv. All noncredit courses except noncredit distance education courses and noncredit independent study courses
 - v. Apprenticeship classes of related and supplemental instruction; applies to students in these classes who are not indentured apprentices. Indentured apprentices in these classes use a separate attendance reporting system.
 - vi. Noncredit courses of individual student tutoring

Note: With certain exceptions, FTES for any credit course may be computed using the Actual Hours of Attendance Procedure at the option of the district. The exceptions are:

1. Independent study and work experience education courses, and
2. In most cases, distance education and hybrid courses report using the Alternative Attendance Accounting Procedure.

- d. The **Alternative Attendance Accounting Procedure** (formerly called the Independent Study/Work Experience Education Procedure) applies to the following types of courses:
 - i. All independent study courses
 - ii. All cooperative education/internship/work experience courses
 - iii. All distance education and hybrid courses (a combination of distance education and classroom/laboratory instruction) that do not qualify for the Weekly Student Contact Hour Procedure or the Daily Student Contact Hour Procedure. See the Distance Education Guidelines and related supplementary publications for the special requirements for distance education and hybrid courses to qualify for WSCH or DSCH reporting.

Alternative Attendance Accounting Procedure – Weekly Census: The weekly student contact hours reported for each class should be the product of the number of students actively enrolled at census times the number of units of academic credit associated with the class. It is allowable to add laboratory hours in special cases; see Item 4 in the Audit Criteria section above for details.

Alternative Attendance Accounting Procedure – Daily Census: The total student contact hours reported for each class should be the product of the number of students actively enrolled at census times the number of units of academic credit associated with the class, times the approved term length multiplier. It is allowable to add laboratory hours in special cases; see Item 4 in the Audit Criteria section above for details.

- e. A special rarely used attendance accounting procedure involving two census dates for each course applies to all noncredit distance education and noncredit independent study courses. See the SAAM for details and references to related California Code of Regulations, title 5 regulations.
- 4) Verify that courses are appropriately scheduled and contact hours are computed in accordance with California Code of Regulations, title 5 Regulations and the Student Attendance Accounting Manual (SAAM), including SAAM Addendum Concerning Academic Calendars, Course Scheduling, and Related Topics.
- a. Compute Weekly or Daily Census contact hours reported based on the regularly scheduled hours for each class as published in the official schedule of classes, and not on the total number of contact hours listed on the course outline of record or college catalog.
 - b. Scheduling of courses must be consistent with the total number class hours indicated in the approved course outline of record. Permit reasonable variances if due to legitimate scheduling considerations caused by course compression, computational exigencies, or exceptions provided for in California Code of Regulations, title 5. Auditors should use their judgment as to “reasonable variance” based on the guidance and examples in the SAAM Addendum Concerning Academic Calendars, Course Scheduling and Related Topics.

- c. Compute individual class schedules on five-minute increments for starting and ending times (e.g., 8:00 a.m. to 9:25 or 8:00 a.m. to 11:10 a.m.)
 - d. Compute contact hours based on definitions and rules in California Code of Regulations, title 5 section 58023 and the SAAM, with a special focus on multiple-hour classes (e.g., a class that meets from 8:00 a.m. to 9:20, 8:00 a.m. to 11:50, or 6:00 p.m. to 9:05 p.m.).
 - e. The start and end times of each class meeting must be explicitly stated in every published schedule of classes and addenda, in print and online, exclusive of To Be Arranged hours (TBA).
 - f. Verify that correctly computed course section tabulations exist and contact hours aggregate appropriately for purposes of district contact hour and FTES reports, including the district's Apportionment Attendance Accounting Report (CCFS-320).
- 5) Verify that the district has secured, as applicable, Chancellor's Office approval for credit and noncredit courses reported for apportionment funding, and that the local governing board approved all courses following approval by a district/college curriculum committee.
 - 6) Verify that the Chancellor's Office approved all noncredit courses before students' enrolled in the courses. Under conditions described in the Program and Course Approval Handbook, some credit courses may not require Chancellor's Office approval, such as non-degree-applicable credit courses and degree-applicable credit courses, which are not part of an approved educational program (commonly known as "stand-alone" courses).

425 RESIDENCY DETERMINATION FOR CREDIT COURSES

.01 Background

District internal fiscal controls should ensure that state apportionment claimed for student attendance in credit courses is within statute and regulation limitations. Student residence classification at the time of registration is a major factor for allowing districts to claim state apportionment for credit courses.

.02 Criteria

- 1) [Education Code](#) sections 68000-68044, 68050-68080, 68082, 68100, 68130, 76140, 76140.5, and 76143
- 2) [California Code of Regulations, title 5](#), sections 54000-54072, 58012, 59114, and 59116.
- 3) [Chancellor's Office, Student Attendance Accounting Manual and related advisories \(SAAM\)](#)

.03 Compliance Requirement

Auditors may test all criteria above. Each district must ensure they claim only the attendance of California residents for State support of credit classes.

.04 Suggested Audit Procedures

- 1) Test the supporting residency documentation (hardcopy and/or electronic) of a sample of students in credit courses to determine whether each student has been properly classified as either a "resident" or a "nonresident". The residence questionnaire used by the district in making residence classifications must require students to certify their answers under oath or penalty of perjury (certified electronically using an electronic signature or a manual signature).
- 2) In addition, test a sample of student-athletes in credit courses to determine if residency status is properly classified. Enrolled student-athletes participate in an organized competitive sport sponsored by the district/college.
 - a. Compare the student's admission application and residence questionnaire to the Athlete's Commission Athletics Form 1 for applicable information and confirm consistency.
- 3) Review the tabulations for the students in the above selected credit course section samples to determine whether the attendance claimed for nonresidents is appropriate for State support.

426 STUDENTS ACTIVELY ENROLLED

.01 Background

For attendance accounting purposes, districts are required to clear the rolls of all inactive students as of each course section's drop date. The drop date shall be no later than the end of business of the day immediately preceding the beginning of the census week in weekly census procedure courses, or the day immediately preceding census day in daily census procedure courses, and is the date used to clear the rolls of the inactive enrollment for attendance accounting purposes. For noncredit distance learning courses, the drop date to clear the rolls of inactive students shall be the day prior to each of the two census dates.

.02 Criteria

- 1) [California Code of Regulations, title 5](#), sections 58000, 58003.1, 58004, 58012, 58030, 58051, 58052, 59114, and 59116, 59350.
- 2) [Student Attendance Accounting Manual and related advisories \(SAAM\), California Community Colleges](#), pages 1.02-1.0

.03 Compliance Requirement

Auditors may test all criteria above. Each district shall claim for apportionment purposes only the attendance of students actively enrolled in a course section as of the census date (if census procedures are used to record attendance in the course section).

.04 Suggested Audit Procedures

- 1) For weekly census procedure courses, review course schedules to determine applicable credit courses are coterminous with the primary term and that the census weeks used in computing contact hours of enrollment are correct. Census week is the week nearest one-fifth of the number of weeks of the primary term (each week counted shall include at least three days of instruction or examination, exclusive of mandatory or local holidays).

- 2) For daily census procedure courses, review credit course schedules to determine the correct census day was determined as that nearest one-fifth of the number of sessions scheduled for the course, exclusive of mandatory or local holidays.
- 3) For short-term daily census courses where the census falls on the first day of the course, the enrollment is to reflect the active enrollment as of the end of the first day, and the census is on the second day.
- 4) For noncredit distance learning (independent study) courses, determine that the correct census dates were at the points nearest the one-fifth and three-fifths of the length of the course.
- 5) Test supporting disenrollment records to see whether they substantiate the count of active enrollment recorded on selected census procedure course tabulations.
- 6) As of the last day of business that precedes the census day, any student who has:
 - a. Been identified as a no show, or
 - b. Officially withdrawn from the course, or
 - c. Been dropped from the course

Is not eligible for funding in the course pursuant to Title 5 sections 58003.1 and 58004.

427 DUAL ENROLLMENT (CCAP and Non-CCAP)

.01 Background

CCAP

On January 1, 2016, College and Career Access Pathways (CCAP) became a new option for dual enrollment that resulted from Assembly Bill 288 (Holden, 2015). Education Code section 76004 incorporates this bill into law. CCAP allows a community college district to enter into a partnership with the governing board of a school district. Once a community college district incorporates an aspect of CCAP dual enrollment that is not allowable or required under previously existing law for Non-CCAP dual enrollment, the district must adopt all the legal requirements of AB 288 and Education Code section 76004. There can be no partial implementation of the CCAP track for dual enrollment. If CCAP track is in use, the district must meet all applicable requirements.

As long as the requirements set forth in AB 288 are met, community college districts may enter into a formal partnership agreement with local school districts to provide a CCAP program. Benefits of this track include allowing qualified special part-time students to enroll in up to 15 units and the units constitute no more than four community college courses per term (and waiver of specified student fees, including nonresident tuition fees), and apportionment eligibility for closed college courses on high school campuses that occur during the high school's regular school day.

Where they do not conflict with specific provisions of Education Code section 76004 as enacted by AB 288, other statutes such as Education Code sections 76001 and 76002 (including the Legal Opinion 16-02 analysis from the

Chancellor's Office on Non-CCAP dual enrollment programs) also apply under CCAP.

Non-CCAP

Existing law authorizes the establishment of community college districts under the administration of community college governing boards, and authorizes these districts to provide instruction at community college campuses throughout the state. Per Education Code section 48800, the governing board of a school district may authorize K-12 pupils who would benefit from advanced scholastic or vocational work, upon recommendation of the principal of the pupil's school of attendance, and with parental permission, to attend community college as special part-time or full-time students. These students may undertake one or more courses of instruction at the community college level in accordance with Education Code sections 76001 and 76002. This is now Non-CCAP dual enrollment.

Community college districts are authorized to continue providing or establishing new dual enrollment opportunities in the same manner that they were providing prior to the enactment of AB 288 (through individual student enrollment or under an optional formal agreement with local school districts).

Operating under Both CCAP and Non-CCAP Tracks: A community college district may have a combination of Non-CCAP and CCAP dual enrollment opportunities, as long as it adheres to all applicable requirements.

.02 Criteria

General

- **The 10-percent dual enrollment FTES cap under AB 288 (Education Code section 76004(w)) is a statewide cap. As such, the state will monitor this limit and individual districts do not need to stay below 10-percent. An individual district or campus may have a higher percentage of Dual Enrollment FTES submitted for state apportionment funding. The Chancellor's Office will continue to monitor special admit FTES and advise districts as we approach the cap and/or if we believe it might be exceeded.**
- **New Nonresident Tuition Fee Provisions are Applicable to Both CCAP and Non-CCAP Tracks.** AB 2364 (Holden, 2016) signed September 12, 2016 and effective on January 1, 2017, modifies Education Code section 76140. Community college districts are required to exempt all qualifying nonresident special "part-time" students (other than those with a non-immigrant status, such as those present in the United States on a B visitor Visa*) from the nonresident tuition fee and expressly allows districts to report their attendance as resident FTES for apportionment purposes.

Under CCAP dual enrollment, qualifying special part-time student status is enrollment up to 15 units and the units constitute no more than four community

college courses per term. Under Non-CCAP dual enrollment, qualifying special part-time student status permits enrollment up to 11.99 units.

*** As an interpretation of AB 2364, the Chancellor's Office has determined nonresident special part-time students that hold a T or U non-immigrant visa would NOT be excluded from this required nonresident tuition fee exemption and qualifying special part-time students must reside in California during the period of attendance.**

CCAP

- [Education Code](#) sections 11300, 48800–48802, 49011, 58012, 66010.4, 76000–76002, 76004, 76060.5, 76140, 76223, 76300, 76350, 78032, 79121, 84752, and 87010.
- **New Exemption from High School Principal's 5-Percent Summer Session Recommendation Limitation.** AB 526 (Holden, 2016) signed September 21, 2016 and effective immediately upon signature as an urgency bill modifies Education Code section 48800. CCAP enrolled students are exempt from the high school principal's 5-percent summer session recommendation limitation, if conditions listed in Education Code section 48800 are met, until January 1, 2020.
- [California Code of Regulations, title 5](#), sections 51004, 51006, 51021, 53410, 55002, 55100, 58050, 58051(a) (1), 58051.5, 58052, 58056(a), 58058, 58060, 58100–58108, 59114, 59116, and 59300 et seq.
- Legal Opinion [M 02-20](#), issued by the Chancellor's Office.
- [Legal Opinion 16-02](#), "Dual Enrollment and Assembly Bill 288 (CCAP)" – issued March 11, 2016, by the Chancellor's Office.
- [AB 288 \(Dual Enrollment\) College and Career Access Pathways \(CCAP\) Partnership Agreement Guidelines for Apportionment Eligibility, March 2016](#)
- [January 4, 2016 UPDATED GUIDELINES FOR INSTRUCTIONAL SERVICE AGREEMENTS](#)

Non-CCAP

- [Education Code](#) sections 48800–48802, 49011, 66010.4, 76000–76002, 76060.5, 76140, 76223, 76300, 76350, 78032, 79121, 84752, 87010, (for Long Beach CCD only – add sections 48810–48814, 76003, 87011, and 99301)
- [California Code of Regulations, title 5](#), sections 51004, 51006, 51021, 53410, 55002, 55100, 58012, 58050, 58051(a) (1), 58051.5, 58052, 58056(a), 58058, 58060, 58100–58108, 59114, 59116, and 59300 et seq.
- [Legal Opinion 16-02](#), "Dual Enrollment and Assembly Bill 288 (CCAP)" – issued March 11, 2016, by the Chancellor's Office.
- Legal Opinion [M 02-20](#), issued by the Chancellor's Office.
- [AB 288 \(Dual Enrollment\) College and Career Access Pathways \(CCAP\) Partnership Agreement Guidelines for Apportionment Eligibility, March 2016](#)
- [January 4, 2016 UPDATED GUIDELINES FOR INSTRUCTIONAL SERVICE AGREEMENTS](#)

.03 Compliance Requirements

Auditors may test all criteria above.

CCAP

The community college district has a CCAP partnership with a school district partner governed by a CCAP partnership agreement approved by the governing boards of both districts. As a condition of, and before adopting, the CCAP partnership agreement, the governing board of each district, at an open public meeting of that board, presented the dual enrollment partnership agreement as an informational item. The governing board of each district, at a subsequent open public meeting of that board, took comments from the public and approved the agreement.

The CCAP partnership agreement outlines the terms of the CCAP partnership and includes the total number of high school students the district expects to serve, and the total number of FTES the community college district expects to claim for those students. The scope, nature, time, location, and listing of community college courses the district expects to offer and criteria to assess the ability of pupils to benefit from those courses. The CCAP partnership agreement also establishes protocols for information sharing, in compliance with all applicable state and federal privacy laws, joint facilities use, and parental consent for high school pupils to enroll in community college courses.

The CCAP partnership agreement identifies a point of contact for the participating community college district and school district partner.

A copy of the CCAP partnership agreement is on file with the Chancellor's Office and with the State Department of Education before the start of the CCAP partnership.

The district participating in a CCAP partnership shall not provide physical education course opportunities to high school pupils pursuant to Education Code section 76004 or any other course opportunities that do not assist in the attainment of at least one of the goals listed in Education Code section 76004(a).

The district has not entered into a CCAP partnership with a school district within the service area of another community college district, except where an agreement exists, or where established, between those community college districts authorizing that CCAP partnership.

A high school pupil enrolled in a course offered through a CCAP partnership shall not be assessed any fee that is prohibited by Education Code section 49011.

The participating district may assign priority for enrollment and course registration to a pupil seeking to enroll in a community college course that is required for the pupil's CCAP partnership program. This priority is equivalent to the priority assigned to a pupil attending a middle college high school as described in Education Code section 11300

and consistent with middle college high school provisions in Education Code section 76001.

The CCAP partnership agreement certifies that any community college instructor teaching a course on a high school campus has no past conviction for any sex offense as defined in Education Code section 87010, or any controlled substance offense as defined in Education Code section 87011.

The CCAP partnership agreement certifies that any community college instructor teaching a course at the partnering high school campus has not displaced or resulted in the termination of an existing high school teacher teaching the same course on that high school campus.

The CCAP partnership agreement certifies that a qualified high school teacher teaching a course offered for college credit at a high school campus has not displaced or resulted in the termination of an existing community college faculty member teaching the same course at the partnering community college campus.

The CCAP partnership agreement includes a certification by the participating community college district of all of the following:

- 1) A community college course offered for college credit at the partnering high school campus does not reduce access to the same course offered at the partnering community college campus.
- 2) The CCAP partnership is not being offering a community college course that is oversubscribed or has a waiting list.
- 3) Participation in the CCAP partnership is consistent with the core mission of the community colleges pursuant to Education Code section 66010.4, and that participating pupils will not lead to enrollment displacement of otherwise eligible adults in the community college.

The CCAP partnership agreement certifies that both the school district and community college district partners comply with local collective bargaining agreements and all state and federal reporting requirements regarding the qualifications of the teacher or faculty member teaching a CCAP partnership course offered for high school credit.

The CCAP partnership agreement specifies which participating district is the employer of record for purposes of assignment monitoring and reporting to the county office of education, and which participating district assumes reporting responsibilities pursuant to applicable federal teacher quality mandates.

The CCAP partnership agreement certifies that any remedial course taught by community college faculty at a partnering high school campus is open only to high school students who do not meet their grade level standard in math, English, or both. This includes a qualified high school teacher teaching a college course as an “employee” of the community college district pursuant to California Code of Regulations,

title 5 section 58058(b). This is an interim assessment in grade 10 or 11, as determined by the partnering school district.

The delivery of these remedial courses shall involve a collaborative effort between high school and community college faculty to deliver an innovative remediation course as an intervention in the student's junior or senior year to ensure the student is prepared for college-level work upon graduation.

The district may limit enrollment in a community college course solely to eligible high school students if the course is located at a high school campus during the high school's regular school day and the community college course is part of a CCAP partnership agreement.

For purposes of allowances and apportionments from section B of the State School Fund, a community college district conducting a closed course on a high school campus can earn credit for units of FTES attributable to the attendance of eligible high school pupils.

The district may allow a special **part-time** student participating in a CCAP partnership agreement to enroll in up to a maximum of 15 units per term if all of the following circumstances are satisfied:

- 1) The units constitute no more than four community college courses per term.
- 2) The units are part of an academic program that is part of a CCAP partnership agreement established pursuant to all applicable requirements.
- 3) The units are part of an academic program designed to award students both a high school diploma and an associate degree or a certificate or credential.

The governing board of a participating community college district exempts special part-time students in this program from the fee requirements in Education Code sections 76060.5, 76140, 76223, 76300, 76350, and 79121.

The district will not receive a state allowance or apportionment for an instructional activity for which the partnering district has been, or will be, paid an allowance or apportionment.

If no school district has received reimbursement for the same instructional activity, the attendance of a high school pupil at a community college as a special part-time or full-time student pursuant to this section is authorized attendance for which the community college may be credited or reimbursed pursuant to Education Code section 48802 or 76002.

For each CCAP partnership agreement entered into pursuant to Education Code section 76004, the community college district and school district shall report annually to the Chancellor's Office all of the following information:

- 1) The total number of high school pupils by school site enrolled in each CCAP partnership, aggregated by gender and ethnicity, and reported in compliance with all applicable state and federal privacy laws.
- 2) The total number of community college courses by course category and type and by school site enrolled in by CCAP partnership participants.
- 3) The total number and percentage of successful course completions, by course category and type and by school site, of CCAP partnership participants.
- 4) The total number of FTES generated by CCAP partnership community college district participants.

Nothing in this program affects how a dual enrollment partnership agreement existing on the effective date of Education Code section 76004 under which an early college high school, a middle college high school, or California Career Pathways Trust existing on the effective date of this section operates. An early college high school, middle college high school, or California Career Pathways Trust partnership agreement existing on the effective date of this section shall not operate as a CCAP partnership unless it complies with the provisions of this section.

Non-CCAP

A community college district may claim FTES for the attendance of K-12 pupils who take courses offered by the district under this dual enrollment arrangement only if it complies with all the following:

- 1) Education Code section 76002(a) specifies that for purposes of receiving state apportionments, a community college district may include high school pupils who attend a community college within the district pursuant to Education Code sections 48800 and 76001 in the district's report of FTES only if those pupils are enrolled in community college classes that meet all the following criteria:
 - a. The class is open to the public.
 - b. The class is advertised as open to the general public in one or more of the following:
 - i. The college catalog.
 - ii. The regular schedule of classes.
 - iii. An addendum to the college catalog or regular schedule of classes.
 - c. If a decision to offer a class on a high school campus is made after the publication of the regular schedule of classes, and the class is solely advertised to the general public through electronic media, the class shall be so advertised for a minimum of 30 continuous days prior to the first meeting of the class.
 - d. Class offered at a high school campus may not meet during the time the campus is not open to the public, as defined by the governing board of the school district during a regularly scheduled board meeting.
- 2) If the class is a physical education class, no more than ten percent of its enrollment may be comprised of special part-time or full-time students. In the view of the Chancellor's Office, this ten percent limit serves as a limit on how

many students may be claimed for apportionment in each course section, not how many may actually be enrolled in a class section. In addition, a community college district may not receive state apportionment for special part-time and full-time students enrolled in physical education courses in excess of five percent of the district's total reported FTES of special part-time and full-time students. PE courses under CCAP are also subject to the 5-percent FTES cap under Education Code section 76002(a)(4) if the district wishes to receive state apportionment for special admit students.

- 3) The district must comply with the credit course approval requirements of Title 5 sections 51004, 51021, 55002(a) or (b), 55100, and 58050. Courses are not eligible for apportionment if they have not been properly approved by the district and, where applicable, by the Chancellor's Office, or are not taught in accordance with a locally established course outline.
- 4) The district must comply with the instructor supervision requirements of Title 5 sections 55002(a)(4), 55002(b)(4), 58050, 58051(a)(1), 58052, 58056, 58058, and 58060. In addition, the instructor qualification requirements of sections 53410 and 58060. Educational activities of students used in computing FTES must be under the immediate supervision and control of an academic employee of the district authorized to render service in that capacity. Immediate supervision requires the presence of the authorized employee and is characterized by all of the following:
 - a. The employee is able to provide immediate instructional supervision and control, in terms of physical proximity and range of communication; and
 - b. The employee is in a position to provide supervision and control for the protection of the health and safety of students; and
 - c. The authorized employee does not have any other assigned duty during the instructional activity for which there is an attendance claim.
- 5) For courses taught under a contract with a public or private agency as provided in Title 5 section 58058, a district must have contracts both with the agency and with the individual who will provide the instruction. Both contracts must specify that the community college district has the primary right to control and direct the activities of the person providing the instruction. The requirements concerning immediate instructional supervision and control apply fully to those persons who provide instruction under these special contracts. If satisfying all the conditions, the person furnished by the public or private agency remains an employee of the agency. The person is an "employee of the district" only for the limited purpose of rendering instructional service during the term of the contract. In all cases, including the special contracting system, employees of the district who teach credit courses must meet the minimum qualifications for community college instructors. In most cases, the minimum qualification is the possession of a master's degree in the discipline of the instructor's assignment, or the equivalent.
- 6) Per Education Code section 84752, no community college district shall receive FTES funding for activities fully funded through another source. If a contract between a community college and a K-12 school district contains provisions that the K-12 school district will pay the community college for the full costs of offering

a particular course, the community college district cannot claim apportionment for the course.

- 7) Per Education Code section 48800, for summer sessions, K-12 principals may not recommend more than five percent of the number of pupils who have completed a particular grade immediately prior to the time of the recommendation. In addition:
 - a. Recommended pupils must demonstrate adequate preparation in the discipline they wish to study.
 - b. The pupil must exhaust all opportunities to enroll in an equivalent course, if any, at his or her school of attendance.
- 8) Per Education Code section 76001(d), special part-time students may enroll in up to 11.99 (less than 12) units per semester.
- 9) Per Education Code section 76002(b), the governing board of a community college district may restrict the admission or enrollment of a special part-time or full-time student during any session based on any of the following criteria:
 - a. Age.
 - b. Completion of a specified grade level.
 - c. Demonstrated eligibility for instruction using assessment methods and procedures established pursuant to Education Code sections 78210 – 78300 and regulations adopted by the Board of Governors of the Chancellor's Office.

.04 Suggested Audit Procedures

Determine if the district under audit is using CCAP track Dual Enrollment, Non-CCAP track Dual Enrollment, or both types. Proceed accordingly with the following suggested procedures. Some of the suggested steps occur in the suggested procedures for both tracks, but others are unique. Keep the tracks separate as you test. Do not mix the requirements of the two tracks.

For dual enrollment attendance claimed by the community college district for state apportionment and related to the suggested audit procedures below, test a representative sample of the courses generating the greatest number of dual enrollment FTES.

Include the number of FTES claimed for the instructional activity of any conditions cited for the following:

Note: Request Management Information Systems Data Mart data element: SB11, Student Education Status from District management information system to identify special admit students currently enrolled in K-12.

CCAP

- 1) Review the CCAP agreement for compliance with given criteria above. The AB 288 Partnership Agreement Guidelines address the requirements and permissive elements.
- 2) Test participating CCAP students for eligibility based on the criteria given above.

- 3) Where the community college district limits enrollment in a course solely to eligible high school students, verify that the offered course is at a high school campus during the high school's regular school day and the offered course is pursuant to a CCAP Partnership Agreement. CCAP courses not offered in this manner are required to be open to the public as evidenced by a clear and understandable description of the course published in the official catalog, and/or schedule of classes, and/or addenda (Education Code section 76004 and Title 5 sections 51006, 58050, 58051.5, and 58102–58108).
- 4) Verify that any special **part-time** high school students present in the CCAP course sample are enrolled in no more than 15 units per term, and that the units constitute no more than four courses per term, and other applicable requirements as noted in Education Code section 76004(p). Verify the district charged appropriate fees for all CCAP students that do not meet the criteria of special **part-time** students.
- 5) Determine the district has not claimed state apportionment funding for special part-time and full-time students (both in CCAP and Non-CCAP dual enrollment) enrolled in physical education courses in excess of five percent of the district's total reported FTES of special part-time and full-time students (Education Code section 76002(a)(4)).
- 6) For physical education course sections not occurring at high school campuses during the regular school day, determine not more than ten percent of the enrollment **claimed** for apportionment for each course section consists of special part-time or full-time students (Education Code section 76002(a)(4)).
- 7) Determine if courses received necessary approvals and adhered to the applicable outline of record (Title 5 sections 51004, 51021, 55002, and 55100 et seq.).
- 8) Determine if the instructor teaching each course satisfies applicable minimum qualifications (Cal.Code Regs., tit. 5, sections 53410 et seq. and 58060).
- 9) Determine if instruction for each course was under the immediate supervision and control of the responsible district employee (Title 5 section 58056).
- 10) Where the CCAP course instructor is not a paid employee of the community college district, verify the college or community college district has a written agreement or contract with each instructor conducting instruction that generates FTES for state apportionment. The contracts must state the college or district has the primary right to control and direct the instructional activities of the instructor. The contract between the college or community college district and the instructor must be finalized and in effect prior to the commencement of instruction (Title 5 section 58058(b)).
- 11) Verify that the community college district received certification from the high school district certifying that full funding from other sources does not exist for any courses conducted under a CCAP agreement (Education Code section 84752 and Title 5 section 58051.5).
- 12) For summer session attendance, determine if the district has procedures to require K 12 principal(s) certify that they have not recommended for community college attendance more than five percent of the total number of pupils who completed that grade immediately prior to the time of recommendation. As

indicated in the Criteria section above, AB 526 became law on September 21, 2016 and permits high school principals to exclude from the five percent limit calculation specified CCAP students (Education Code section 48800 (d) (2)).

- a. Auditor may test other documentation maintained by the District aside from certifications; however, contemporaneous evidence should provide similar assurances.
- b. Regarding the responsibility to ensure compliance with the 5% limitation for summer session admission, reference Legal Opinion 16-02, Question III.D.2.

Non-CCAP

- 1) Determine if courses were open to the public as evidenced by a clear and understandable description of the course published in the official catalog, and/or schedule of classes, and/or addenda (Education Code section 76002 and Title 5 sections 51006, 58050, 58051.5, and 58102–58108).
- 2) If a decision to offer a class on a high school campus is made after the publication of the regular schedule of classes, and the class is solely advertised to the general public through electronic media, the class must be advertised for a minimum of 30 continuous days prior to the first meeting of the class ([Reference Legal Advisory 16-02, section III\(B\)](#) on page 18).
- 3) Determine if the registration procedures for courses had the purpose or effect of limiting enrollment to a specialized clientele such as K-12 pupils.
- 4) Determine if courses receive necessary approvals and are taught in accordance with the applicable outline of record (Title 5 sections 51004, 51021, 55002, and 55100 et seq.).
- 5) Determine if the instructor teaching each course satisfies applicable minimum qualifications (Title 5 sections 53410 et seq. and 58060).
- 6) Determine if instruction for each course is under the immediate supervision and control of the responsible district employee (Title 5 section 58056).
- 7) Where the course instructor is not a paid employee of the community college district, verify the college or community college district has a written agreement or contract with each instructor conducting instruction that generates FTES for state apportionment. The contracts must state that the college or district has the primary right to control and direct the instructional activities of the instructor. The contract between the college or community college district and the instructor must be finalized and in effect prior to the commencement of instruction (Title 5 section 58058(b)).
- 8) Verify the community college received verification from any contracted public or private agencies certifying that full funding does not exist from other sources for any courses conducted under a contractual agreement. This includes those pursuant to Title 5 section 58058. Where no contract exists, determine whether the district obtained such a certification or can otherwise demonstrate that other sources have not fully funded the instructional activity conducted (Education Code section 84752 and Title 5 section 58051.5).
- 9) Verify special part-time K-12 students present in the course sample enrolled in no more than 11.99 (less than 12) units per semester and the district has

obtained verification from the K-12 school district that the student can benefit from advanced scholastic or vocational work (Education Code sections 48800(a), 48800.5, 76300 and 76001(d)).

Verify enrollment fees assessed are correct once a student enrolls in over 11.99 (less than 12) units in a term and student becomes a special full-time student.

- 10) Determine the district has not claimed state apportionment funding for special part-time and full-time students (both in CCAP and Non-CCAP dual enrollment) enrolled in physical education courses in excess of five percent of the district's total reported FTES of special part-time and full-time students (Education Code section 76002(a)(4)).
- 11) For physical education course sections, determine that not more than ten percent of the enrollment claimed for apportionment for each course section consists of special part-time or full-time students (Education Code section 76002(a)(4)).
- 12) For summer session attendance, determine if the district has procedures to require K 12 principal(s) certify that they have not recommended for community college attendance more than five percent of the total number of pupils who completed that grade immediately prior to the time of recommendation. AB 526 was signed into law on September 21, 2016 and permits high school principals to exclude from the five percent limit calculation specified CCAP students (Education Code section 48800(d)(2)).
 - a. Auditor may test other documentation maintained by the district aside from certifications; however, contemporaneous evidence should provide similar assurances.
 - b. Regarding the responsibility to ensure compliance with the 5% limitation for summer session admission, reference Legal Opinion 16-02, Question III.D.2.

428 STUDENT EQUITY

.01 Background

The intent of student equity planning funds are to ensure equal educational opportunities and to promote student success for all students, regardless of race, gender, disability, or economic circumstances. For the purposes of college equity planning and funding, we define equity as helping students achieve equal outcomes on equity success indicators as compared to either their own percentage in the community or college student body, or to other student groups. Each community college is required to maintain a student equity plan that includes:

- 1) Campus-based research on equitable outcomes for high-need student groups as defined in statute and regulation;
- 2) Goals for access to, and completion of courses, basic skills improvement, transfer and degree and certificates for all students and for high-need students;
- 3) Evidence-based activities to help students and the college meet these goals.

Legislative Purpose, Target Populations and Plan Requirements

The Chancellor's Office, Board of Governors (BOG) adopted a student equity policy in 1992 enjoining all districts to develop, implement, and evaluate a student equity plan. In 1996, the BOG amended its policy to establish the adoption of a student equity plan as a minimum standard for receipt of all state funding. In 2002, the BOG implemented title 5 regulations (§ 54220 & 51026) requiring colleges to develop a student equity plan to ensure that groups historically underrepresented in higher education have an equal opportunity for access, successful course completion, English as a Second Language (ESL) and basic skills completion, and completion of degrees, certificates and transfer to baccalaureate degree granting institutions.

The Governor and Legislature created additional requirements in June 2014 (Education Code sections 78220 through 78221) specifying additional student populations and providing further definitions for identifying existing populations that must be addressed in equity plans. At a minimum, colleges must address students in the following ethnic and racial categories, as defined by the US Census Bureau for the 2010 Census:

- 1) American Indian or Alaska Native
- 2) Asian
- 3) Black or African American
- 4) Hispanic or Latino
- 5) Native Hawaiian or other Pacific Islander
- 6) White
- 7) Some other race
- 8) More than one race

In addition, plans must address students with the following characteristics:

- 1) Males
- 2) Females
- 3) Current or former foster youth
- 4) Students with disabilities
- 5) Low-income students
- 6) Veterans

Colleges may also conduct research and develop goals or activities for any of the ethnic groups above, foster youth, disabled or low-income students, or veterans by gender, if data seems to indicate it would be beneficial to students.

Coordination with Other Equity Related Programs and Services

Since 2012, Education Code section 78216 created by the Student Success Act [Senate Bill (SB) 1456] has required colleges to coordinate the development of Student Success and Support Program (SSSP) plans with their Student Equity Plans. This ensures colleges identify strategies to monitor and address equity issues in the delivery

of SSSP core services and attempt to mitigate any resulting disproportionate impacts on student access and achievement. Therefore, student equity plans should clearly identify strategies and criteria associated with SSSP. The State Budget Act of 2014 also added new requirements related to coordinating with other programs. Colleges are now required to coordinate equity planning and activities with the following:

- 1) Disabled Students Programs and Services (DSPS)
- 2) Extended Opportunity Programs and Services (EOPS)
- 3) Math, Engineering, Science Achievement (MESA), Puente and Middle College High School Programs
- 4) Student Success and Support Program (SSSP)
- 5) Programs for foster youth
- 6) Programs for veterans
- 7) California Work Opportunity and Responsibility to Kids (CalWORKs)
- 8) Student Financial Aid Administration, Board Financial Assistance Program (BFAP)
- 9) Basic Skills Initiative (BSI)

.02 Criteria

- [Education Code](#) sections 78216, & 78220 - 78221
- [California Code of Regulations](#), title 5, sections 51026, 54220, 58012, 59114, & 59116
- [Expenditure Guidelines](#)
- [Student Equity Plan Template](#), including success indicator definitions and [Budget template](#)
- [9/28/2016](#) memo from interim Chancellor Skinner

.03 Compliance Requirement

Auditors may test all criteria above. Student Equity Plans identify student populations disproportionately impacted according to the college research in the plan, and who are in need of extra support should be the primary recipients of services. Only allowable expenditures are charged to Student Equity funds as described in the Student Equity Expenditure Guidelines unless the Chancellor's Office granted an explicit exception on a case-by-case basis. No local funding match is required for student equity funds. Match requirements for any other State of California categorically funded program that includes a matching fund requirement cannot use Student equity funds.

.04 Suggested Audit Procedures

- 1) Submission of Student Equity plans are required every three years. Verify the college submitted a signed Student Equity Plan and budget for the Chancellor's Office approval for the most recent year it was required. Verify the local board of trustees approved the college Student Equity Plan.
- 2) Verify that the college submitted other program-required forms to the Chancellor's Office (annual mid-year reports, and annual year-end expenditure reports).

- 3) Review submission dates for all required materials in items above for timeliness. If documents were submitted late, verify an extension was granted by the Chancellor's Office.
- 4) Test expenditures of Student Equity Plan funding for compliance with the Student Equity Expenditure Guidelines on the Chancellor's Office website, and with the other criteria listed above. The annual Year-End reports or other local documentation held at the college may document expenditures.

429 STUDENT SUCCESS AND SUPPORT PROGRAM FUNDS

.01 Background

The Seymour-Campbell Student Success Act of 2012 (Lowenthal, SB 1456) requires the California Community Colleges to provide core student services to lay a foundation for student achievement and successful completion of educational goals. Priority is on serving students who enroll to earn degrees and career technical certificates, prepare for transfer to a four-year institution or additional training, and advance their careers. First time, nonexempt students are required, within a reasonable timeframe, to identify an educational goal, a career goal, and a course of study and to participate in core services. Community college districts may elect to exempt certain students from participation in these services in accordance with Title 5 section 55532.

The Student Success and Support Program (SSSP) provides the following core services to credit and noncredit students:

- 1) Orientation
- 2) Assessment for placement
- 3) Counseling, advising and education planning
- 4) Follow-up services for at-risk students
- 5) Other services

Per title 5, section 55511, each district shall provide for a review of the revenue and expenditures of the Student Success and Support Program as part of its annual financial audit. The Chancellor's Office has determined the districts must provide a 1:1 match for credit SSSP expenditures while the budget act authorizes a 1:1 matching fund basis to provide SSSP services in designated noncredit programs. The noncredit programs must submit a program certification form annually to receive SSSP funds.

Core SSSP services for credit and noncredit programs that are claimable against state funds include:

- 1) **Orientation** for students and potential students to acquaint them with, at a minimum, college programs, student support services, facilities and grounds, academic expectations, institutional procedures, and other appropriate information pursuant to Title 5 section 55521.
- 2) **Initial assessment for appropriate placement** of students and potential students into Math, English, and ESL curricula. The following California Code of

Regulations, title 5 regulations govern assessment: section 55502 (Definitions), section 55520 (Required Services), section 55522 (Assessment), section 55526 (Accommodations), section 55530 (Student Rights and Responsibilities), section 55531 (Institutional Responsibilities), and section 55532 (Exemptions). Colleges must use assessment instruments approved by the Chancellor's Office pursuant to Title 5 section 55522(a).

- 3) **Counseling, advising and education planning services**, as required by Title 5 sections 55523, 55524, 55530, and 55034, as well as Education Code, section 78212. These regulations require colleges to provide counseling and advising services, and to create or update a student educational plan for all non-exempt students. Counseling and advising services provided may be to an individual student or a group of students. Colleges may provide the following education plans:
 - a. An abbreviated student education plan (SEP), which is a one- to two-term plan that may precede a comprehensive SEP or serve as the only SEP needed for a student who can accomplish their program in one or two semesters.
 - b. A comprehensive SEP, which is an education plan that is at least two terms in length and reflects the number of terms required to achieve the student's declared course of study (California Code of Regulations, title, 5, section 55524). Pursuant to Title 5 section 55530, nonexempt students who have participated in the core services are required to complete a comprehensive education plan after completing 15 semester units or 22 quarter units of degree applicable credit course work or prior to the end of the 3rd semester or 4th quarter of enrollment, or a shorter period if required by district or program policy.
 - c. A noncredit SEP (NSEP), which is required for first-time noncredit students. The NSEP priority focus is on those who enroll to earn diplomas or career technical certificates, enhance skills, maintain a certificate or license, participate in career ladder pathways, or fulfill life-long learning goals. The NSEP is equivalent to a comprehensive SEP and is completed as soon as possible for students enrolled in short-term programs.
- 4) **Follow-up services** for at-risk students, pursuant to Title 5 section 55525. At-risk students are students enrolled in basic skills courses who have not identified an education goal and course of study, are on academic or progress probation, or are facing dismissal. Follow-up services may include, but are not limited to, academic or progress probation interventions, student success workshops, early alert services, and referrals to other support services. All follow-up services are on a one-to-one basis or through group counseling sessions, student success workshops, etc.
- 5) **Other services** provided, consistent with MIS data element SS11, may include subsequent orientations; other assessments (e.g., career and interest assessments, placement assessments for subjects other than entry-level Math, English or ESL, or re-testing); revisions or development of an additional SEP beyond the initial abbreviated and comprehensive SEPs (e.g., if the student changes course of study); and other academic progress services.

Actions that do not qualify for funding as follow-up services are those that are a one-sided action on the part of the college and those that are primarily administrative or clerical.

Additional information on SSSP services and funding guidelines is available in the [SSSP Handbook](#) and [the Student Success MIS Data Elements](#). All SSSP services provided are reported through the MIS data elements regardless of frequency.

.02 Criteria

- [Education Code](#) sections 78210-78219, 84044
- [California Code of Regulations, title 5](#), sections 51024, 55500-55534, and 58106
- [SSSP Handbook](#)
- [the Student Success MIS Data Elements](#)
- [9/28/2016 memo from Interim Chancellor Skinner](#)
- [Expenditure Guidelines](#)

.03 Compliance Requirement

Auditors may test all criteria above. Nonexempt students as of the fall 2015 semester and thereafter should be receiving required services, unless reported as exempted to the Chancellor's Office. SSSP funds may only be used for expenditures and matching funds as stated in the Expenditure Guidelines.

.04 Suggested Audit Procedures

- 1) Test student counts for the core services listed in the background section above.
- 2) Test expenditures of the SSSP for compliance with the criteria listed above.
- 3) Verify that noncredit programs using SSSP funds submitted a program certification for the current year.
- 4) Test expenditures of SSSP funding for compliance with the Student Success and Support Program Expenditure Guidelines on the Chancellor's Office website, and with the other criteria listed above. The annual Year-End reports or other local documentation held at the college may document expenditures.
- 5) Verify the college submitted other program-required forms to the Chancellor's Office (certifications, mid-year reports, and year-end expenditure reports).
- 6) Verify the districts have met the match requirements for the SSSP.
- 7) Test that college MIS data submissions conform to the SSSP data definitions.

430 SCHEDULED MAINTENANCE PROGRAM

.01 Background

The Scheduled Maintenance Program is designed to protect the State's investment in community colleges through the timely repair and maintenance of facilities, to correct and avoid health and safety hazards, to maintain an environment conducive to learning, to prevent the disruption of programs, and to improve long-term cost effectiveness of facility operations.

Scheduled maintenance and special repair means unusual, non-recurring work to restore a facility to a safe and continually usable condition of original intent.

.02 Criteria

- [Education Code](#) section 84660
- [California Code of Regulations, title 5](#), sections 57200-57205
- [2013 Budget Act](#) [AB 110, Ch. 20, Item 6870-101-0001(19)] Requirement for audit is on page 532-533, provision 30(a)(1)
- Scheduled Maintenance 5-Year Plan – located in the FUSION system
- [Scheduled Maintenance Program Criteria for Evaluating Waiver of 50% District Match](#)
- Budget and [Accounting](#) Manual (BAM)
- [Block Grant Certification for Expenditures](#)
- [FP99-09 Facilities Planning Unit Advisory dated August 6, 1999](#)

.03 Compliance Requirement

Funds provided by the State must be to supplement, not supplant, district deferred maintenance funds. This is the amount spent in fiscal year 1995-96 for Operation and Maintenance of Plant increased by an amount equal to the State's contribution and the district's match for the Scheduled Maintenance Program for the year under audit.

.04 Suggested Audit Procedures

- 1) Determine how much in district funds was spent in fiscal year 1995-96 in the General Fund on Operation and Maintenance of Plant (Activity Code 6500), excluding any state funds and match dollars expended for "Deferred Maintenance and Special Repairs" as defined in Education Code, section 84660, if reported in Activity Code 6500 (This amount may be found in the audit report for fiscal year 1998-99).
- 2) Determine how much the district expended for Operation and Maintenance of Plant (Activity Code 6500) in the General Fund for the fiscal year under audit.
- 3) Determine Scheduled Maintenance and Special Repairs block grant expenditures (include state and district match) for the fiscal year being audited.
- 4) Determine other Scheduled Maintenance and Special Repairs expenditures incurred and funded by district or other funds for the fiscal year under audit.
- 5) Add the amounts determined in 2, 3, and 4 above.
- 6) Add the amounts determined in 1 and 3 above.
- 7) A reportable instance occurs if the amount identified in **6** above is greater than the amount identified in **5** above. The worksheet below will assist the auditor in determining compliance.

**SCHEDULED MAINTENANCE PROGRAM
MAINTENANCE OF EFFORT WORKSHEET**

1. 1995-96 Operations and Maintenance Expenditures
(Actual from 1998-99 Annual Audit Report). \$ _____

Expenditures for fiscal year being audited

2. General Fund Expenditures – Routine Maintenance
and
Operation of Plant (Activity 6500) and Physical Property
and Related Acquisitions (Activity 7100) All Fund
Sources \$ _____

3. Total Scheduled Maintenance and Special Repairs
Block Grant Expenditures (Includes State and District
Match) \$ _____

4. District/Other Funded Scheduled Maintenance and
Special Repairs Expenditures \$ _____

5. Total Expenditures (Add lines 2, 3, and 4) \$ _____

6. Line 1 Plus Line 3 \$ _____

Maintenance of Effort test is adequate if line 5 equals or
exceeds line 6.

431 GANN LIMIT CALCULATION

.01 Background

Article XIII-B of the California Constitution and Chapter 1205, Statutes of 1980, require each community college to compute its annual appropriation limit. Each limit is adjusted annually for changes in price index, population and, if applicable, other factors. Title 5 section 58303 indicates the district's adopted budget shall also include the appropriations limit and the total annual appropriations subject to limitations. Government Code, section 7908(c) requires each community college district to report to the Chancellor of the California Community Colleges and to the Director of the Department of Finance at least annually its appropriation limit, appropriations subject to limit, state aid apportionments, subventions included within property tax proceeds and amounts excluded from the appropriations subject to limit. Report this information in the Annual Financial and Budget Report (CCFS-311), Part 2 General Fund Supplemental Data.

.02 Criteria

- [Article XIII-B](#), section 1.5 of the California Constitution
- Proposition 111, effective July 1, 1990
- [California Code of Regulations, title 5](#), section 58303
- [Government Code](#), section 7908(c)

.03 Compliance Requirement

Auditors may test all criteria above. Each district's adopted CCFS-311 contains the appropriations limit, and the total annual appropriations subject to limitation as determined pursuant to Government Code, Division 9 (commencing with section 7900). Certified public accountants as part of annual financial audits shall verify the calculation and adoption.

.04 Suggested Audit Procedures

- 1) Obtain the Gann Limit Worksheet for the current fiscal year from the district business office and compare the summary figures reported in the CCFS-311 with the Gann Limit Worksheet totals.
- 2) Test the calculations performed on the worksheet.
- 3) Trace the source figures used on the current year's worksheet back to the source documents. For instance, previous years' attendance figures are available on the CCFS 320s. Line 1.A., the previous year's Apportionment Limit including state transfer, is an accumulation of previous years' calculations. Trace that amount back to the total from the previous year's worksheet. It is not necessary to trace that amount back through the numerous worksheet calculations since 1980.

The district's governing board does not need to certify the worksheet calculations with the change in reporting requirements.

- 4) Reportable errors exist if calculations are significantly in error or if there is inaccurate summarization of source figures.

435 OPEN ENROLLMENT

.01 Background

Title 5 section 51006, specifies the governing board of each community college district shall adopt by resolution a policy related to open courses. In addition, a statement of this policy shall be published in the official catalog, schedule of classes, and any addenda to the schedule of classes for which FTES is reported for state apportionment. Finally, each district shall also file a copy of the statement with the Chancellor's Office.

.02 Criteria

- [California Code of Regulations, title 5](#), sections 51006, 58012, 58050, 58051, 58051.5, 58051.6, 58102, 58104, 58106, 59114, and 59116
- [Penal Code, section 832.3\(c\)](#)
- [Legal Opinion 16-02](#), Dual Enrollment and Assembly Bill 288 (CCAP) by the Chancellor's Office
- [AB 288 \(Dual Enrollment\) College and Career Access Pathways \(CCAP\) Partnership Agreement Guidelines for Apportionment Eligibility March 2016](#) by the Chancellor's Office

.03 Compliance Requirement – Open Courses

Auditors may test all criteria above. Community college districts shall comply with the Title 5 provisions related to open enrollment by the public for all the courses submitted for state apportionment funding.

Courses that qualify for state apportionment must be open to enrollment by the public unless specifically exempted by statute. Title 5 sections 58102, 58104, and 58106 outline certain requirements that districts must meet to ensure that their courses are open and available to all students. For example, Title 5 section 58104 states that a description of each course must be published in the official catalog and schedule of classes and that for courses that the districts establish or conduct after publication of the general catalog or regular schedule of classes, those classes must also be reasonably well publicized. Furthermore, course announcements shall not be limited to any specialized clientele, nor shall any group or individual receive notice before the public for purposes of preferential enrollment. Anyone who might be interested in enrolling in a particular course section will know it is available and understand that enrollment is open to anyone who meets properly established prerequisites or enrollment limitations through course advertising.

State apportionment is available for in-service training courses in the areas of police, fire, corrections, and other criminal justice system occupations if the courses meet all apportionment attendance and study requirements otherwise imposed by law. At least 15 percent of the enrollment in law enforcement continuing training prescribed in Penal Code, sections 830-832.16 shall consist of persons who are not law enforcement trainees if the persons are available to attend a course. At least 15 percent of the enrollment in in-service fire training courses shall consist of persons who are not volunteers of, nor employed by, a fire protection or fire prevention agency or

association, if the persons are available to attend a course (Title 5 section 58051(c), (d), and Penal Code section 832.3(c)).

Community colleges may give preference in enrollment to persons employed by or serving in a voluntary capacity with a fire protection or prevention agency or to law enforcement trainees when such persons could not otherwise complete the course within a reasonable time or the time required by statute, and when no other training program is reasonably available. For purposes of state apportionment, classes must be located in facilities identified clearly to promote attendance by the public except where statute allows otherwise. See Legal Advisory 05-04, Distance Education and Open Course Requirements, which provides that the Chancellor's Office will from the date of the advisory accept two-way synchronous distance education conducted between fixed locations as being "open" and eligible for apportionment if at least half of the sites are open to all students (Title 5 sections 58051(d) and 58051.5(a)(3))

.04 Suggested Audit Procedures

- 1) Sample the class announcements of classes claimed for state apportionment to ensure that all classes were open to all admitted students unless specifically exempted. Ensure that classes conducted off campus are included in the items tested, if applicable.
- 2) Ensure all classes included in the above sample are located in facilities clearly identified in such a way to ensure that attendance is open to all admitted students unless exempted by statute. For example, ensure classes offered at a high school campus are scheduled at times that the high school campus is open to the public.
- 3) Test a sample of classes to ensure that all classes were in the college catalog and in the class schedule for the term offered. There should be a clear and understandable description of each class.
- 4) Verify in-service training courses meet apportionment attendance and study requirements. Include samples of police, fire, corrections, and other criminal justice system courses offered at the district.

439 PROPOSITION 39 CLEAN ENERGY FUND

.01 Background

The implementing legislation for Proposition 39 added a new chapter within the Clean Energy Job Creation division of the Public Resources Code. Funding provided to community college districts pursuant to Public Resources Code, section 26240(g) is subject to annual audits required by the Education Code, section 84040.

.02 Criteria

- [Public Resources Code, sections 26225-26240](#)
- [Education Code, section 84040](#)
- [Approved CCC Proposition 39 Energy Project Guidelines](#)
- [Project Funding Application](#)
- [Public Contract Code, section 20113](#)

.03 Compliance Requirement

Financial compliance includes: installation of approved plan retrofits or new installations; reflection of the Chancellor's Office approved Proposition 39 Project Funding application and Project Measurement and Verification (M&V) documentation in actual equipment installations; supporting documents substantiate purchases; and, for larger ticket items like boilers and HVAC, serial numbers on equipment match serial numbers on supporting purchase documents.

Source documents should support administrative/overhead costs, if allowed. Track and report Proposition 39 funds separately, and do not comingle with other funds. Comply with rules for competitive bidding, and the Public Contract Code.

Install energy efficient retrofit or new installation as required in the approved project scope.

Utility energy cost savings are tracked pre and post retrofit to verify effectiveness by means of the Program Tracking Database.

.04 Suggested Audit Procedures

- 1) Verify separate tracking and reporting for Proposition 39 funds. Comingling of Proposition 39 funds with other state or local funds is not allowed.
- 2) Review Final Project Verification Report to ensure completion and that it has appropriate signatures.
- 3) Trace items on the Chancellor's Office approved Proposition 39 Project Funding application and Project Verification Report to supporting documents (invoices, purchase orders, etc.).
- 4) Verify compliance with competitive bid process and other Public Contract Code requirements.
- 5) Trace a sample of serial numbers on purchase documents for large equipment items such as boilers and HVAC to the equipment to verify items purchased with Proposition 39 funds are in service at the district.

440 INTERSESSION EXTENSION PROGRAMS

.01 Background

To assist students in reaching their educational goals, a program to provide access to credit courses during summer and winter intersession programs began in 2014. Community college districts may submit individual campuses for participation in the program through their governing boards. This program is self-supporting. Enrollment in the program is not eligible for state apportionment funding.

.02 Criteria

- [Education Code](#), sections 66025.8, 76141, 76142, 78212, 78230, 78231, Article 2 of Chapter 1 of Part 50, commencing with section 84030

- [Title 5 division 6](#), commencing with section 50001, with specific attention to sections 51006, 55002(a), 55041, and 58108

.03 Compliance Requirement

Auditors may test all criteria above. Participating campuses have received permission to participate from the Chancellor's Office.

.04 Suggested Audit Procedures

- 1) Verify that the campus has received approval to participate in the program.
- 2) Test that the program complies with Education Code sections 78230(c)-(k).
- 3) Test that the district has the collected and submitted program records as required in Education Code section 78230(l)(1).

444 APPRENTICESHIP RELATED and SUPPLEMENTAL INSTRUCTION (RSI) FUNDS

.01 Background

Apprenticeship programs offer Californians a pathway to in demand high wage and high-growth careers. Meeting the diverse and technical needs for hundreds of industries and occupations requires training. The planned training involves a progression of tasks on the job combined with classroom instruction which integrates the why and how of the job. Apprenticeship programs can be set up for any occupation that involves the use of independent judgment in applying a wide range of skills and knowledge.

.02 Criteria

- [Apprenticeship California Labor Code Sections 3070-3098](#)
- [Education Code](#) sections 8150-8155, 79140 - 79149.6
- [California Code of Regulations, title 5, section 56652](#)
- [Student Attendance Accounting Manual](#) Chapter 5
- [Budget and Accounting Manual](#) Chapter 3
- [Annual Budget Act](#)
- Apprenticeship Expenditure and Accounting Guidelines (request these at the site under audit)

.03 Compliance Requirements

- a) Auditors may test all criteria above. Hours for related and supplemental instruction reported to each community college district by a participating apprenticeship program sponsor, pursuant to Education Code section 79149.3, must be eligible for reimbursement pursuant to Education Code section 79149.3.
- b) Reimbursements may be made under this section for related and supplemental instruction provided to indentured apprentices only if the instruction is provided by a program approved by the Division of Apprenticeship Standards of the

Department of Industrial Relations in accordance with Chapter 4 (commencing with Section 3070) of Division 3 of the Labor Code.

- c) Reimbursement requests for RSI must be supported by source documents such as student sign in sheets for classes. Remote students must also show proof of having received instruction to be eligible for RSI funds.

.04 Suggested Audit Procedures

- 1) Select a representative sample of students and verify the hours claimed for RSI, as reported by a participating apprenticeship program sponsor pursuant to Education Code sections 8150.5, 8152, and 79149.3, are eligible for reimbursement, by tracing the hours reported for reimbursement to source documents (i.e. student sign in sheets).
- 2) For isolated apprentices, as defined by Labor Code section 3074, select a representative sample of students and obtain evidence that supports attendance during instructional events.
- 3) State in a finding the resulting hours inappropriately reported for reimbursement and an estimate of their dollar value.

475 DISABLED STUDENT PROGRAMS AND SERVICES (DSPS)

.01 Background

Disabled community college students are those with exceptional needs who have applied to or enrolled at a community college that, because of a verified disability, cannot benefit from general education classes, activities, and services without specific additional DSPS program support services.

The purposes of these special programs and services are to integrate the disabled student into the general college program; provide educational intervention leading to vocational preparation, transfer, or general education; and increase independence or referral of the students to community resources most appropriate to their needs. These programs apply only when they facilitate the student's measurable progress towards his or her educational goals. Do not count potential students for DSPS funding that have not applied to or enrolled at the college. Disabled Student Programs and Services is a categorical aid program authorized under AB 77 (Chapter 275, Statutes of 1976) as amended by AB 2670 (Chapter 1407, Statutes of 1978). The program is further modified by AB 8 (Chapter 282, Statutes of 1979), and SB 1053 (Chapter 796, Statutes of 1981), amended by AB 746 (Chapter 829, Statutes of 1987). Most recently, AB 2791 amends these programs (Chapter 109, Statutes of 2016). The basis for state allocations for the program are on an excess-costs basis to meet the educational needs of students with verifiable disabilities. Community college districts shall submit student-count data annually to document eligible DSPS students served.

.02 Criteria

- [42 United States Code](#) section 12101

- [Education Code](#), sections 14020.1, 66010.4, 66701, 67300-67313, 70901, 71020.5, 84320-84328, and 84850. Beginning January 1, 2017, this section changes language for eligibility from “enrolled” to “applied to or enrolled” in state-sponsored disabled student services programs or courses.
- [California Code of Regulations, title 5](#), sections 56000-56076, 59114, and 59116
- [Management Information Systems Data Mart – DSPS reports](#)
- [Chancellor’s Office DSPS Guidance](#) (includes allocations link)

.03 Compliance Requirement

Auditors may test all criteria above. Colleges must allow auditors to review student files for DSPS eligibility.

.04 Suggested Audit Procedures

- 1) Test student files for eligibility, including that they are “enrolled” prior to January 1, 2017, or have “applied to or enrolled” in the college after January 1, 2017 for state-sponsored disabled student services programs or courses.
- 2) Test expenditures for appropriate use of DSPS funds.

479 - TO BE ARRANGED HOURS (TBA)

.01 Background

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 pursuant to California Code of Regulations, title 5, sections 58003.1(b) and (c), respectively. Procedures required for the TBA hours are below. In some situations, the entire course might be on TBA, and in that case, this course would follow the same rules.

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 hours are only an option for credit courses that apply the Weekly or Daily Attendance Accounting Procedures and not to those that apply the Alternative Attendance Accounting Procedure pursuant to California Code of Regulations, title 5, section 58003.1(f) (i.e., Distance Education courses not computed using other attendance accounting procedures, Independent Study courses, and Cooperative-Work Experience education courses).

.02 Criteria

- [Education Code](#), sections 84040 and 88240

- [California Code of Regulations, title 5](#), sections 53415, 55002, 55002.5, 58000, 58003.1, 58006, 58020, 58030, 58050, 58051, 58056, 58102, 58104, 58108, 58168, 58170, 58172, 59020, and 59112, 59114, and 59116
- [Student Attendance Accounting Manual and related advisories](#)
- [Latest Clarification on TBA Memorandum, March 8, 2013](#)
- [Second To Be Arranged \(TBA\) Hours Follow-up Memorandum, June 10, 2009](#)
- [To Be Arranged \(TBA\) Hours Follow-up Memorandum, January 26, 2009](#)
- [To Be Arranged \(TBA\) Hours Compliance Advice \(Legal Advisory 08-02\), October 1, 2008](#)

.03 Compliance Requirement

Auditors may test all criteria above. Districts are required to list TBA hours in the schedule of classes, and describe them in the course outline.

Districts need to track TBA hour student participation carefully and make sure they do not claim apportionment for TBA hours for students who have documented zero hours as of the census point for the particular course.

.04 Suggested Audit Procedures

1. Determine a clear description of the course, including the number of TBA hours required, appears in the official schedule of classes or addenda thereto. See the latest clarification on TBA memorandum dated March 8, 2013 in the criteria section above.
2. Determine specific instructional activities, including those conducted during TBA hours, expected of all students enrolled in the course are included in the official course outline. All enrolled students know of these instructional activities and expectations for completion via class syllabus or other document.
3. Determine apportionment and attendance record compliance as of census date by reviewing supporting documentation such as the attendance roster.

490 PROPOSITIONS 1D and 51 STATE BOND FUNDED PROJECTS

.01 Background

Per Executive Order S-02-07, department expenditures of Proposition 1D and Proposition 51 bond proceeds shall be subject to audit to determine whether the expenditures made from bond proceeds:

- 1) Were made according to the established front-end criteria and processes,
- 2) Were consistent with all legal requirements, and

- 3) Achieved the intended outcomes.

Community college districts submit claims for reimbursement of expenditures incurred for capital outlay projects to the Chancellor's Office. Supported claims are paid. Examples of support include invoices, Capital Outlay Budget Change Proposals (COBCPs), approved equipment lists, and documents that release funds from the Department of Finance for specific project phases (DF14Ds). The Chancellor's Office cannot reimburse claims if invoices are not previously paid or incurred prior to release of funds for the specific project phase in question.

.02 Criteria

- [Education Code, sections 81837, 84040, and 101032 through 101039.5](#)
- [Title 5 Community College Construction Act, sections 57000-57205](#)
- [Executive Order S-02-07](#)
- Proposition 51 Proposed Laws (not available in Education Code at time of publishing audit Manual)
- [Capital Outlay Budget Change Proposals \(COBCPs\) for projects being tested](#)
- [Equipment Lists](#) for projects being tested – this link is just an example, you must request one from the district
- Grant Documents (DF14Ds) for projects being tested – these documents authorize the release of project funds by the Department of Finance for selected community colleges to start a project phase

.03 Compliance Requirement

Reported Proposition 1D and Proposition 51 costs for the audit period must be accurately reported, appropriate, incurred for the project, and paid by the district.

.04 Suggested Audit Procedures

- 1) Select a sample of claimed costs reported on the Capital Outlay Program Claim forms submitted for state reimbursement.
- 2) Verify the claimed costs are project-related and reimbursed by the state during the audit period.
- 3) Verify the dates and invoices, cancelled checks, and/or other source documents adequately support claimed costs.
- 4) Verify the dates of the claimed costs are within the effective dates on the related form DF14D.
- 5) Conclude whether the costs are accurately reported on the claim forms, appropriate, incurred for the project, and paid by the district.

491 EDUCATION PROTECTION ACCOUNT FUNDS

.01 Background

In 2012, Proposition 30 created an Education Protection Account (EPA) within the General Fund. In 2016, Proposition 55 then extended the EPA through 2030 with no changes to reporting requirements. A community college district shall have sole

authority to deter, mine how to spend the moneys received from the EPA in the school or schools within its jurisdiction. The appropriate governing board or body shall make these spending determinations in open session of a public meeting of the governing board or body and shall not use any of the funds from the EPA for salaries or benefits of administrators or any other administrative costs.

Each community college district shall annually publish on its Internet website an accounting of how much money it received from the EPA and how it spent the money. The Annual Financial and Budget Report (CCFS-311) now contains a Supplemental Data Report for EPA fund expenditures, similar to the Receipt and Expenditures of Lottery Proceeds Report. Use object code 8630 for EPA revenues.

Expenses paid with funding from the EPA to comply with the additional audit requirement of this section are the only acceptable administrative costs for purposes of this section. Accounting Advisory FS 16-13 clarifies this topic. Sections 250 and 327 in the CDAM require reconciliation of and reporting on the EPA account.

.02 Criteria

- [The California Children’s Education and Health Care Protection Act of 2016](#)
- [California Constitution Article XIII section 36](#)
- [California Community Colleges Budget and Accounting Manual 2012 edition](#)
- [California Community Colleges Apportionment Reports](#)
- [Accounting Advisory FS 16-13](#)

.03 Compliance Requirement

EPA funds disbursed and expended comply with the California Children’s Education and Health Care Protection Act of 2016.

.04 Suggested Audit Procedures

- 1) Verify the local governing board held an open session public meeting where they took action to adopt a plan to expend EPA funds.
- 2) Verify the district expended EPA funds according to the board adopted EPA spending plan.
- 3) Verify EPA funds were not used to support administrative salaries and benefits or other administrative costs consistent with the Chancellor’s Office Accounting Advisory FS 16-13 dated December 19, 2016.

SECTION 500
FEDERAL COMPLIANCE REQUIREMENTS

510 OVERVIEW

.01 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200) replaced the Office of Management and Budget Circulars A-133, A-110, and A-21. These revisions include, among various other changes affecting the CDAM, an increase to the audit threshold from \$500,000 to \$750,000. There is also a revised audit finding threshold. Under the new requirements, the known and likely questioned costs threshold increases from \$10,000 to \$25,000.

.02 The U.S. Department of Education now requires institutions that participate in federal student financial aid programs to submit data from their audited financial statements as well as attaching a PDF of their audit report using the eZ-Audit submission system within nine months of their fiscal-year end effective June 16, 2003. Additional information about this process is found at:

<https://ezaudit.ed.gov/EZWebApp/common/login.jsp>. Public and/or non-for-profit institutions still need to submit their audit report to the Federal Audit Clearinghouse as required under Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200).

.03 Recipients of federal awards exceeding \$750,000 are required to have a single or program-specific audit conducted for that year in accordance with the provisions of Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200). The Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards sets forth the major compliance requirements for an organization-wide audit of a community college district that receives federal assistance. It identifies the programs and related compliance requirements, and provides suggested audit procedures applicable in audits of community college districts. The revised Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards is published at the following link: [Code of Federal Regulations](#).

.04 For those federal programs not covered in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, the auditor should use the types of compliance requirements contained in the contract for receipt of federal funds as guidance in selecting the types of compliance tests to perform. The auditor must determine the requirements governing the federal program by reviewing the provisions of contracts and grant agreements and the laws and regulations referred to in such contracts and grant agreements. Auditors should use professional judgment to choose procedures and determine the extent of tests performed. Tailor the audit procedures to individual programs and circumstances. The auditor is also responsible for ensuring that specific requirements modified by a change in a law or regulation are included in the audit procedures.

520 REQUIRED FEDERAL COMPLIANCE TESTS

.01 In making a determination not to test a compliance requirement, the auditor must conclude that either the requirement does not apply to the particular non-federal entity or that failure to comply with the requirement will not have a material effect on a major program. Auditors shall consider the compliance requirements and related audit objectives for programs included in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in every audit of non-federal entities with the exception of program specific audits performed using a federal agency's program specific audit guide.

521 CONDITIONAL TESTS OF GENERAL COMPLIANCE (EDGAR)

.01 Background

Vital components to implementing any federal program are the general administrative requirements contained in section 34 of the Code of Federal Regulations more commonly called the Education Department General Administrative Regulations (EDGAR). EDGAR defines the uses of federal funds and provides administrative procedures that grantees and sub grantees must apply to those funds.

Beyond EDGAR, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200), which replaced the Office of Management and Budget Circulars A-133, A-110, and A-21, include, among various other changes impacting the CDAM, an increase to the audit threshold from \$500,000 to \$750,000. Find the revised Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at the following link: [Code of Federal Regulations](#).

.02 Compliance Requirement

- 1) A grantee shall keep financial records that clearly show:
 - a. The amount of funds under the grant;
 - b. How the grantee uses the funds;
 - c. The total cost of the project;
 - d. The share of the cost provided from other sources; and
 - e. Other records to facilitate an effective audit.
- 2) Generally, financial status reports shall not be required more frequently than quarterly. When reports are required quarterly, they shall be due 30 days after the end of the reporting period. Final reports, addressing both financial status and program performance, shall be due 90 days after the completion of the award.
- 3) A grantee's financial management system shall provide accurate, current, and complete disclosure of the financial results of each federally sponsored project. The grantee's records shall:
 - a. Provide information pertaining to awards, authorizations, obligations, unobligated balances, assets, outlays, income, and interest.

- b. Compare outlays with budget amounts for each award.
- 4) A grantee shall retain records for three years from the date of the submission of the final expenditure report or, for awards renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report. Exceptions to the three year requirement are as follows:
 - a. If any litigation, claim, or audit begins before the expiration of the three-year period, retain the records until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
 - b. Retain records for real property and equipment acquired with federal funds for three years after final disposition.
 - c. The three-year retention period for documents related to indirect cost rate computations or proposals, cost allocation plans and any similar accounting computations shall start on the date of submission of those records for negotiation, if that is the case, or at the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

.03 Criteria

- Code of Federal Regulations, Part 75, section [730](#); and Part 76, section [730](#)
- [Code of Federal Regulations, Chapter 2, part 200](#)

.04 Compliance Requirement

Procedures for managing equipment purchased with federal funds, until transfer or disposition takes place meet the following requirements:

- 1) The recipient's property management standards for equipment acquired with federal funds and for federally owned equipment should include all of the following:
 - a. A description of the equipment.
 - b. Manufacturer's serial number, model number, federal stock number, national stock number, or other identification number.
 - c. Source of the equipment, including the award number.
 - d. Whether title vests in the recipient or the federal government.
 - e. The information needed to calculate the federal share of the equipment.
 - f. Acquisition date and unit acquisition cost.
 - g. Location, use and condition of the equipment and date of information capture.
 - h. Ultimate disposition data, including date of disposal and sales price or the method used to determine the current fair market value where a recipient compensates the federal awarding agency for its share.
- 2) Take physical inventory of equipment and reconcile results with the equipment records at least once every two years, verify the existence, current use, and continued need for the equipment. Investigate differences between physical inventory and accounting records to determine cause of difference. A statistical sampling basis is acceptable.
- 3) A control system shall be in effect to insure adequate safeguards to prevent loss, damage, or theft of the equipment. Investigate and document loss, damage, or

theft of equipment. Implement adequate maintenance procedures to keep the equipment in good condition.

.05 Criteria

- [Code of Federal Regulations, Chapter 2, part 200](#)

.06 Compliance Requirement

The replacement and/or disposal of federal property require that the grantee follow these procedures:

Replacement of Equipment

When replacing equipment, the recipient may use the replaced equipment as trade-in or sell the equipment and use the proceeds to offset the costs of the replacement equipment subject to the approval of the federal awarding agency.

Disposition of Equipment

When the recipient no longer needs the equipment, they may use it for other activities in accordance with the following standards. For equipment with a current per unit fair market value of \$5,000 or more, the recipient may retain the equipment for other uses if compensating the original federal awarding agency or its successor. Compute the amount of compensation by applying the percentage of federal participation in the cost of the original project or program to the current fair market value of the equipment. If the recipient has no need for the equipment, the recipient shall request disposition instructions from the federal awarding agency. The federal agency shall issue instructions to the recipient no later than 120 calendar days after the recipient's request.

If so instructed or if no disposition instructions occur within 120 calendar days after the recipient's request, the recipient shall sell the equipment and reimburse the federal awarding agency an amount computed by applying the percentage of federal participation in the cost of the original project or program to the sales proceeds. However, the recipient may deduct and retain \$500 or 10 percent of the proceeds, whichever is less, from the federal share for the recipient's selling and handling expenses.

If instructed to ship the equipment elsewhere, the federal government will reimburse the recipient an amount computed by applying the percentage of the recipient's participation in the cost of the original project or program to the current fair market value of the equipment, plus any reasonable shipping or interim storage costs incurred.

If instructed to dispose of the equipment in another way, the federal awarding agency will reimburse recipient for such costs incurred in its disposition.

.07 Criteria

- [Code of Federal Regulations, Chapter 2, part 200](#)

530 MAJOR FEDERAL PROGRAMS

.01 In accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200), auditors shall use a risk-based approach to determine which federal programs are major programs. This approach shall include consideration of current or prior audit experience, oversight by federal agencies and pass-through entities, and the inherent risk of the federal program. The following steps summarize the process followed to identify major programs:

- 1) Programs are either “Type A” or “Type B.” Type A programs are those programs with federal expenditures in excess of \$750,000, or three percent of the auditee’s total federal awards expenditures when those total federal awards expenditures exceed \$25 million, but do not exceed \$100 million. See section .518 of Code of Federal Regulations, Chapter 2, Part 200, for the limits affecting those entities with total federal awards exceeding \$100 million. All federal programs not labeled Type A above are Type B.
- 2) Type A programs are reviewed to determine which are low-risk. A Type A program is considered low risk if it has been audited as a major program at least once during the two most recent audit periods and, in the most recent audit period, had no audit findings per the criteria in section .518 of Code of Federal Regulations, Chapter 2, Part 200. Auditors should apply professional judgment in determining whether a Type A program is low-risk.
- 3) Identify and select high-risk Type B programs based on the criteria in section .518 of Code of Federal Regulations, Chapter 2, Part 200, and the auditor professional judgment. Section .519 includes factors such as current and prior audit experience, oversight exercised by federal and pass-through agencies, and the inherent risk of the federal program. See section .518 of Code of Federal Regulations, Chapter 2, Part 200 for the limits affecting those entities with total federal awards greater than \$100 million. Type B programs over 25 percent of the respective Type A threshold require a risk assessment. The auditor is not required to identify more high-risk Type B programs than 25 percent of the number of low-risk Type A programs.
- 4) At a minimum, the following major programs shall be audited:
 - a. All Type A programs except those classified as low-risk in step 2 above.
 - b. All Type B programs identified as high risk.
 - c. For districts assessed at low risk, the total major programs selected based on the risk assessment must be at least 20 percent of the total federal awards expended. For districts not considered low risk, the percentage coverage increases to 40 percent.

As such, auditors are required to determine auditee compliance with applicable requirements as stipulated in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2,

Part 200). Obtain additional federal program information from the Catalog of Federal Domestic Assistance at <http://www.cfda.gov/>.

During annual reviews, auditors are to refer directly to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200) for specific compliance tests and suggested audit procedures. Address questions regarding a compliance requirement, including changes in requirements, to the administering agency. Obtain requirements and suggested audit procedures for smaller grant programs not contained in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Code of Federal Regulations, Chapter 2, Part 200) from the administering agency.

APPENDIX A

SAMPLE FINANCIAL STATEMENT NOTE FOR EARLY RETIREMENT INCENTIVE PROGRAM

NOTE X – STRS Early Retirement Incentive Program

The District has adopted an early retirement incentive program pursuant to Education Code sections 22714 and 87488, whereby the service credit to eligible employees increases by two years (and age increases by two years). Eligible employees must have five or more years of service under the State Teachers' Retirement System and retire during a period of not more than 120 days or less than 60 days from the date of the formal action taken by the District (retire during the window period in the formal action taken by the district's governing board).

Retiree Information

<u>Position Vacated</u>	<u>Age</u>	<u>Service Credit</u>	<u>Retired Employee</u>		<u>Replacement Employee</u>	
			<u>Salary</u>	<u>Benefits</u>	<u>Salary</u>	<u>Benefits</u>
Instructor	63	29	\$86,000	\$10,000	\$36,000	\$5,000
Instructor	68	26	84,000	10,000	0	0
Counselor	72	30	<u>75,000</u>	<u>12,000</u>	<u>29,000</u>	<u>4,500</u>
			\$245,000	\$32,000	\$65,000	\$9,500

Additional Costs to Employer:

Because of this early retirement incentive program, the District has incurred (or expects to incur) \$205,000 in additional costs. The breakdown in additional costs is below:

Retirement Costs (including interest, if applicable)	\$175,000
Post-retirement Health and Benefit Costs	25,000
Administrative Costs	<u>5,000</u>
Total Additional Costs	<u>\$205,000</u>

APPENDIX B

SAMPLE SCHEDULE OF OTHER POST-EMPLOYMENT HEALTH CARE BENEFITS FUNDING PROGRESS

Sample Community College District
 Schedule of Other Post-Employment Healthcare Benefits Funding Progress
 Year ended June 30, 20XX

Actuarial Valuation Date	Actuarial Value of Assets (AVA)	Actuarial Accrued Liability (Entry Age Normal Cost Method) (AAL)	Unfunded Actuarial Accrued Liability (UAAL)	Funding Ratio	Covered Payroll	UAAL as a Percentage of Covered Payroll
5/7/20xx	\$	\$	\$	%	\$	%
6/1/20xx	\$	\$	\$	%	\$	%
5/29/20xx	\$	\$	\$	%	\$	%

APPENDIX C SAMPLE COMMUNITY COLLEGE DISTRICT ORGANIZATION

June 30, 20xx

Sample Community College District established on July 1, 1963, and covers an area of approximately 12 square miles located in Sacramento County. There were no changes in the boundaries of the District during the current year.

GOVERNING BOARD

<u>Name</u>	<u>Office</u>	<u>Term Expires</u>
Mr. David Johnson	President	April 20xx
Mr. Norman Richards	Secretary	April 20xx
Mrs. Jan McDonald	Member	April 20xx
Mr. James Wilde	Member	April 20xx
Mrs. Louise Hanson	Member	April 20xx

ADMINISTRATION

Dr. Georgia Scott
Superintendent

Mr. Thomas Sharp
Assistant Superintendent

Mrs. Mildred Coleman
Assistant Superintendent

APPENDIX D

SAMPLE COMMUNITY COLLEGE DISTRICT

SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS

For the year ended June 30, 20xx

Federal Grantor/ Subrecipient Pass-Through Entity Program or Cluster Title	Award Amount	Federal CFDA Number	Pass- Through Entity Identifying Number	Total Federal
U.S. Department of Education				
Financial Aid Cluster:				
College Work Study		84.033		\$xxx,xxx
Subrecipient X	\$xxx,xxx			
Subrecipient Y	xxx,xxx			
Perkins Loan		84.038		xxx,xxx
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
Pell Grant		84.063		xxx,xxx
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
Adult Basic Education (ABE)				
Adult Basic Education		84.002		xxx,xxx
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
ABE – Citizenship		84.002		xxx,xxx
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
ABE – ESL		84.002		xxx,xxx
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
Upward Bound				
Subrecipient X	xxx,xxx	84.047		xxx,xxx
Subrecipient Y	xxx,xxx			
		84.044		xxx,xxx
Talent Search II				
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			
		84.042		xxx,xxx
Student Support Services				
Subrecipient X	xxx,xxx			
Subrecipient Y	xxx,xxx			

	84.031	xxx,xxx
Title III - Strengthening Institutions		
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Pass through California Department of Education (CDE):		
Vocational And Technical Education Act (VTEA)		
Tech Prep VTEA, Education	84.048	xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Title I-C VTEA	84.048	xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
U.S. Department of Health and Human Services		
Passed through CDE:		
Temporary Assistance to Needy Families (TANF)	93.558	xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Department of Labor		
WIA Assessment		xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Department of Agriculture		
FC Childcare Food Program		xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Total federal awards expended for loan or loan guarantee programs		xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	
Noncash value of Value of federal awards expended		xxx,xxx
Subrecipient X	xxx,xxx	
Subrecipient Y	xxx,xxx	

APPENDIX E

SAMPLE COMMUNITY COLLEGE DISTRICT SCHEDULE OF STATE FINANCIAL AWARD

For the year ended June 30, 20xx

Program Name	Program Revenues			Total	Total Program Expenditures
	Cash Received	Accounts Receivable	Deferred Income		
State Awards					
Disabled Student Program & Services	\$xxx,xxx	\$xx,xxx	\$x,xxx	\$xxx,xxx	\$xxx,xxx
Extended Opportunity Program & Services	xxx,xxx	xx,xxx	x,xxx	xxx,xxx	xxx,xxx
Cal Grant					
CalWORKS					
Care Program					
Child Development Center					
Economic Development					
Funds for Student Success					
Block Grant					
Instructional Equipment – Block Grant					
Multimedia					
State Block Grant FY xx					
State Funds for Instructional Materials					
Student Success Scorecard					
Teacher & Reading Development Partnership					
Temporary Assistance to Needy Family (TANF)					
Telecommunication Technology					
Infrastructure Program (TTIP)					
Scheduled Maintenance					
General Childcare Grant					
Staff Development					
Total State Programs					

APPENDIX F

SAMPLE COMMUNITY COLLEGE DISTRICT SCHEDULE OF WORKLOAD MEASURES FOR STATE GENERAL APPORTIONMENT

Annual (Actual) Attendance as of June 30, 20xx			
Categories	Reported Data	Audit Adjustments	Revised Data
A. Summer Intersession (Summer 20xx only)			
1. Noncredit ¹			
2. Credit			
B. Summer Intersession (Summer 20xx – Prior to July 1, 20xx)			
1. Noncredit ¹			
2. Credit			
C. Primary Terms (Exclusive of Summer Intersession)			
1. Census Procedure Courses			
(a) Weekly Census Contact Hours			
(b) Daily Census Contact Hours			
2. Actual Hours of Attendance Procedure Courses			
(a) Noncredit ¹			
(b) Credit			
3. Independent Study/Work Experience			
(a) Weekly Census Contact Hours			
(b) Daily Census Contact Hours			
(c) Noncredit Independent Study/Distance Education Courses			
D. Total FTES			
Supplemental Information (subset of above information)			
E. In-Service Training Courses (FTES)			
F. Basic Skills courses and Immigrant Education			
(a) Noncredit ¹			
(b) Credit			
CDCP Noncredit FTES			
Centers FTES			
(a) Noncredit ¹			
(b) Credit			

¹ Including Career Development and College Preparation (CDCP) FTES

APPENDIX G

SAMPLE COMMUNITY COLLEGE DISTRICT RECONCILIATION OF ANNUAL FINANCIAL AND BUDGET REPORT (CCFS-311) WITH AUDITED FINANCIAL STATEMENTS

For the fiscal year ended June 30, 20xx

	General Fund	Special Revenue Fund	Capital Projects Fund	Debt Service Fund
June 30, 20xx, Annual Financial and Budget Report (Form CCFS-311) Fund Balances				
Adjustments and Reclassifications increasing (decreasing) fund balance:				
Prior Year Post Closing Entries				
Post-Closing Entries				
Under (Over) Statement of Accounts Receivable				
(Under) Over Statement of Accounts Payable				
(Under) Over Statement of Deferred Revenue				
(Under) Statement of Accrued Vacation				
Reclassification of interfund operating transfers				
Other				
Net Adjustments and Reclassifications				
June 30, 20xx Audited Financial Statements Fund Balance				

APPENDIX H

SAMPLE COMMUNITY COLLEGE DISTRICT

RECONCILIATION OF ECS 84362 (50 PERCENT LAW) CALCULATION

For the year ended June 30, 20xx

	Object/TOP Codes	Activity (ECSA) ECS 84362 A Instructional Salary Cost AC 0100-5900 & AC 6110			Activity (ECSB) ECS 84362 B Total CEE AC 0100-6799		
		Reported Data	Audit Adjustments	Revised Data	Reported Data	Audit Adjustments	Revised Data
<u>Academic Salaries</u>							
Instructional Salaries							
Contract or Regular	1100						
Other	1300						
Total Instructional Salaries							
Non-Instructional Salaries							
Contract or Regular	1200						
Other	1400						
Total Non-Instructional Salaries							
Total Academic Salaries							
<u>Classified Salaries</u>							
Non-Instructional Salaries							
Regular Status	2100						
Other	2300						
Total Non-Instructional Salaries							
Instructional Aides							
Regular Status	2200						
Other	2400						
Total Instructional Aides							
Total Classified Salaries							
Employee Benefits	3000						
Supplies and Materials	4000						
Other Operating Expenses	5000						
Equipment Replacement	6420						

Total Expenditures Prior to Exclusions							
--	--	--	--	--	--	--	--

	Object/TOP Codes	Activity (ECSA) ECS 84362 A Instructional Salary Cost AC 0100-5900 & AC 6110			Activity (ECSB) ECS 84362 B Total CEE AC 0100-6799		
		Reported Data	Audit Adjustments	Revised Data	Reported Data	Audit Adjustments	Revised Data
<u>Exclusions</u>							
Activities to Exclude							
Instructional Staff–Retirees’ Benefits and Retirement Incentives	5900						
Student Health Services Above Amount Collected	6441						
Student Transportation	6491						
Noninstructional Staff-Retirees’ Benefits and Retirement Incentives	6740						
Objects to Exclude							
Rents and Leases	5060						
Lottery Expenditures							
Academic Salaries	1000						
Classified Salaries	2000						
Employee Benefits	3000						
Supplies and Materials	4000						
Software	4100						
Books, Magazines, & Periodicals	4200						
Instructional Supplies & Materials	4300						
Noninstructional, Supplies & Materials	4400						
Total Supplies and Materials							
Other Operating Expenses and Services	5000						
Capital Outlay	6000						
Library Books	6300						
Equipment	6400						
Equipment - Additional	6410						
Equipment - Replacement	6420						
Total Equipment							
Total Capital Outlay							
Other Outgo	7000						
Total Exclusions							
Total for ECS 84362, 50% Law							

Percent of CEE (Instructional Salary Cost / Total CEE)							
50% of Current Expense of Education							

APPENDIX J SAMPLE NOTES TO SUPPLEMENTAL INFORMATION

For the year ended June 30, 20xx

PURPOSE OF SCHEDULES

Schedule of Expenditures of Federal Awards

The Schedule of Expenditures of Federal Awards includes the Federal grant activity of the District and presents the accrual basis of accounting. The information in this schedule presents in accordance with requirements of the Code of Federal Regulations, Chapter 2, Part 200. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements. The loan or loan guarantee outstanding balance at the end of the audit period is \$xxx,xxx. The district did (or did not) elect to use the 10 percent de minimis indirect cost rate.

Schedule of State Financial Awards

The accompanying Schedule of State Financial Awards includes State grant activity of the District and is presented on the accrual basis of accounting. Therefore, some amounts presented in this schedule may differ from amounts presented in, or used in the preparation of, the basic financial statements. Present the information in this schedule to comply with reporting requirements of the California Community College Chancellor's Office.

Schedule of Workload Measures for State General Apportionment

FTES is a measurement of the number of students attending classes of the District. The purpose of attendance accounting from a fiscal standpoint is to provide the basis for making apportionments of State funds to community college districts. This schedule provides information regarding the attendance of students based on various methods of accumulating attendance data.

Reconciliation of ECS 843632 (50 Percent Law Calculation)

This schedule provides the information necessary to reconcile the 50 Percent Law Calculation reported on the CCFS-311 to the audited data.

Reconciliation of CCFS-311 to audited financial statements

This schedule reports any audit adjustments made to the fund balances of all funds as reported on the Annual Financial and Budget Report (Form CCFS-311).

Education Protection Account (EPA) Funds Report

This schedule provides information about the District's EPA proceeds and summarizes the expenditures of EPA proceeds.

Reconciliation of governmental funds to the statement of net position.

This schedule provides a reconciliation of the adjustments necessary to bring the District's internal fund financial statements, prepared on a modified accrual basis, to the entity-wide full accrual basis financial statements required under GASB Statements No. 34 and No. 35 business-type activities reporting model.

APPENDIX K

SAMPLE SCHEDULE OF FINDINGS AND QUESTIONED COSTS

For the Year Ended June 30, 20xx

(See 20xx AICPA Government Audit Guide)

Summary of Auditors' Results

Financial Statements

Type of opinion on financial statements: _____

Internal control over financial reporting:

 Material Weakness Identified? _____

 Significant deficiency identified but not considered material weaknesses? _____

Noncompliance material to financial statements noted? _____

Federal Awards

Internal control over major programs:

 Material weakness identified? _____

 Significant deficiency identified but not considered material weaknesses? _____

Type of opinion issued on compliance for major programs: _____

Any audit findings disclosed that are required to be reported in accordance With Code of Federal Regulations, Chapter 2, Part 200, section .510(a)? _____

Identification of major programs:

<u>CFDA Number</u>	<u>Name of Federal Program or Cluster</u>
_____	_____
_____	_____
_____	_____
_____	_____

Dollar threshold used to distinguish between Type A and Type B programs: _____

Auditee qualified as low-risk auditee? _____

State Awards

Internal control over state programs:

 Material weakness identified? _____

 Significant deficiencies identified but not considered material weaknesses? _____

Type of opinion issued on compliance for state programs: _____

Financial Statement Findings for the Year Ended June 30, 20xx

The following represent **significant deficiency** related to the financial statements that are in accordance with generally accepted government audit standards. [Insert each finding in the section below with its appropriate number.]

20xx -1 Finding

[Insert Finding]

Recommendation

[Insert Recommendation]

District Response

[Insert the District's Response]

Federal Award Findings and Questioned Costs for the Year Ending 20xx

[Insert criteria, condition, questioned costs, context, effect, cause, recommendation, and views of responsible official and corrective actions.]

State Award Findings and Questioned Costs for the Year Ending 20xx

[Insert criteria, condition, questioned expenditures, FTES, or Students Served, context, effect, cause, recommendation, views of responsible official and corrective actions as referenced in section 280 – Audit Findings]

APPENDIX L

SAMPLE SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS

June 30, 20xx

Except as specified in previous sections of this report, summarized below is the status of all audit findings reported in the prior year's schedule of audit findings and questioned costs and of any other unresolved audit finding from previous years.

Finding Reference Number ²	Recommendation	Current Status	Explanation if Not Fully Implemented
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² Use the identification number referenced by the California Community Colleges in their follow-up activities.