TRUCKEE MEADOWS COMMUNITY COLLEGE
DISTANCE EDUCATION
Internal Audit Report
July 1, 2009 through June 30, 2010

GENERAL OVERVIEW

Truckee Meadows Community College (TMCC) offers approximately 370 distance

education courses each semester. The courses are delivered through an online system in which

students provide a secure user name and password in order to access course materials, participate

in discussions, and take examinations. TMCC faculty that teach distance education courses have

access to the online system and are responsible for all instructional aspects of these courses. The

TMCC WebCollege Department works with faculty in developing distance education courses,

maintaining the online software application, and providing overall support to both students and

faculty. The WebCollege Department is comprised of three full-time employees. The college

has developed guidelines for distance education courses called the TMCC Standards for Online

Instruction.

SCOPE OF AUDIT

The Internal Audit Department has completed a review of distance education at TMCC

for the period of July 1, 2009 through June 30, 2010.

The scope of our review included tests of the accounting records and other auditing

procedures, as we considered necessary. The tests included, but were not necessarily limited to,

these areas.

1. Reviewing the college's distance education standards for completeness and

    compliance with Board of Regents policy.

2. Reviewing the student authentication requirements and faculty log-in reports.

3. Reviewing the distance education software grade book function.

4. Testing expenditures for reasonableness, supporting documentation and proper signature approvals.

5. Reviewing contracts and leave records for proper completion, approval and compliance with established policies.

In our opinion, we can be reasonably assured that the administration and delivery of distance education courses at TMCC is satisfactory. Implementation of the following recommendations, however, would provide further improvements.

DISTANCE EDUCATION STANDARDS

The TMCC Standards for Online Instruction (standards) were approved by the TMCC faculty senate in 2010. We reviewed the document and noted the following areas in which improvements or clarification to the standards could be made.

1. The standards do not address use of the grade book function that is available in the online application. The grade book allows instructors to post students' assignments, test scores, and final grades within the application. The grades are then available for students to review. As noted in the Grade Testing section of this report, a number of discrepancies were noted between a sample of final student grades that were posted to the online application and the official grades that were recorded in the Student Information System (SIS). The review also indicated that the grade book was not being fully utilized by some instructors tested.

In our opinion, the grade book function should be utilized in a consistent manner and the information contained in the grade book should support the final grades that are posted to

the official record. We recommend the standards be updated to address the procedures

for using the grade book function.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns.   TMCC anticipates it will be able to implement a formal set of standards within the next six months.

As concerns the grade book function, the problems identified can be addressed through training; faculty training has been revised to emphasize corrective practices. The revised training will be implemented with the 2011 Fall term and be recurring thereafter.

Prevention and Monitoring: WebCollege will monitor anticipated improvements in grade book consistency from the revised faculty training and modify training as warranted.

Follow Up Response: addressed in required faculty training on grade book in adopted Standards for Online Instruction

2. The standards do not address the requirements for monitoring student attendance in

distance education courses. Federal regulations stipulate that for students who receive

federal financial aid and who subsequently withdraw from classes, institutions are

required to determine whether financial aid funds must be returned based on the students'

last day of attendance. For students who are enrolled in distance education courses the

regulations indicate that, beginning in July 2011, it will no longer be enough to simply

document the last date a student logged into a class. Institutions must demonstrate the

last date in which students participated in class or were otherwise engaged in an

academically related activity such as by contributing to an online discussion, initiating

contact with a faculty member, or submitting required coursework. We were informed

that electronic exchanges between students and faculty members may occur outside the

online application. In addition, course assignments and test scores are not always posted

to the online application, as mentioned above. Thus, information that is reflective of student attendance is currently missing from the online application.

We also noted that personnel within the TMCC Financial Aid Office, which is responsible for calculating refunds of federal financial aid, do not have access to the online application. Access should be provided so the above information can be appropriately monitored and reviewed.

We recommend the standards be updated to provide guidance as to the student attendance and participation information that should be recorded in the online application. We recommend the standards include the procedures for reviewing and monitoring the data by the college's financial aid office. We also recommend access to the application be provided to financial aid office personnel as necessary.

Institution Response

Correction: WebCollege staff met with the director and staff of the Financial Aid office to develop a protocol for compliance with new Federal financial aid requirements related to Distance Education. It was agreed that implementation of new procedures would commence with the 2011 Fall term to allow for required notification to students. Training for online faculty will be augmented to include a handout regarding new student financial aid tracking expectations as well as the need for faculty to schedule an academically related activity during the first week of class. Reports detailing online activity of financial aid students enrolled only in DE classes will also be produced and will be available on a daily basis during the first two weeks of each semester as well as during the 100%,/50% refund periods for last-start classes.. WebCollege staff will generate the needed reports coordinating with staff from the Financial Aid office.

Prevention and Monitoring: the agreed-to set of solutions will be reviewed after the initial implementation (2011 Fall term) and will be annually reviewed each spring and revised as indicated.

 Follow Up Response: included in adopted Standards for Online Instruction.

3. The standards state distance education faculty will log-in to the online application a minimum of three times per week. The intent of the standard is to ensure students have

access to faculty on a regular basis. The standards do not address the manner in which

faculty login data will be monitored or how deficiencies will be reported to the faculty

member and/or TMCC administration. This information is not currently being tracked by

the college. A review of faculty login's indicated that the instructors of 4 of 8 courses

examined did not login to the application at least three times per week.

To help promote academic quality and student success we recommend the standards be

updated to include procedures for monitoring and reporting faculty login data. We also

recommend the standards specify the minimum login requirements for regular semester

courses versus summer term courses.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns.   TMCC anticipates it will be able to implement a formal set of standards within the next six months.

Faculty check-in expectations are included in the current draft of standards for online instruction. Also, faculty interact with students through a variety of mediums other than the Learning Management System.   Examples include: telephone conversations, emails, face-to-face meetings, special study sessions, cloud-supported web sites, and publisher web sites.

Prevention and Monitoring: The WebCollege has historically researched individual faculty login practices based on student complaints or supervisor requests. Those results have always been shared with the appropriate supervisor.

Once a formal set of standards for online instruction have been adopted, WebCollege will develop and implement regular reports based on Learning Management System activity.

Follow Up Response: the current administrative position for WebCollege will be upgraded to Dean effective July1, 2012 (pending final approval of the reorganization by the NSHE Board of Directors at its March 2012 board meeting). The dean will be authorized to enforce the Standards for Online Instruction and will collect appropriate data to be shared with chairs/deans during the faculty review and evaluation process.

4. The standards state that students are to be provided with an informed consent statement

    notifying them of the nature/purpose of an online course, the difference between online

    and classroom instruction, computer literacy requirements, and the behavioral

    expectations of students enrolled in online instruction. We were notified the informed

    consent statement has not been developed.

    We recommend an informed consent statement be developed and provided to distance

    education students as stated in the standards.

    Institution Response

    Correction: Currently, TMCC has no approved or implemented set of standards for
    online instruction. The institution is engaged in efforts to develop a formal set of
    standards but the process is committed to inclusiveness and a thorough vetting of salient
    concerns.   TMCC anticipates it will be able to implement a formal set of standards
    within the next six months.

    WebCollege has maintained on its unit webpage a set of Frequently Asked Questions as
    well as a quiz "Is DE right for you?" to communicate to students the skills and abilities
    students need to be successful in a virtual learning environment. WebCollege launched a
    new virtual student orientation to address student computer skills, familiarity with the
    Learning Management System, and skills for student success beginning with the 2010
    Spring term. In addition, WebCollege has been developing a pilot "readi assessment"
    approach to identify students needing additional skills development for student success in
    the virtual learning environment. Finally, WebCollege is developing an informed
    consent statement for students and will post it on the entry page to the Learning
    Management System beginning with the 2012 Spring term.

    Prevention and Monitoring: WebCollege will coordinate with students and faculty to
    assess the effectiveness of the statement and to make any changes needed to maximize its
    effectiveness.

    **Follow Up Response: the Informed Consent document has been adopted and is
    attached.**

5. The standards state that faculty teaching online courses will explore and adopt strategies

    for improving student retention. The standards do not address these strategies or whether

    this information will be monitored and reported. We were informed the above statement

was included in the standards because the student retention rate for distance education

courses has been about eight to ten percent lower, historically, than for traditional

courses.

We recommend the standards be updated to provide additional information regarding

student retention, as described above.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns. TMCC anticipates it will be able to implement a formal set of standards within the next six months.

WebCollege is working with a set of approved retention strategies (as of March 2009) based on best practices and incorporating a number of strategies included in the proposed Standards for Online Instruction. As TMCC finalizes the standards, specific language related to online student retention will be included.

Prevention and Monitoring: TMCC and WebCollege are committed to improving overall online student retention. Beyond the efforts to formalize a set of institutional standards, WebCollege also offers an annual summer institute of training for online faculty, monitors emerging best practices at other institutions/nationally, and has adopted Quality Matters as a national rubric of course design and teaching – all of which are intended to eliminate any retention gap between online and traditional instruction.

Follow Up Response: the Standards for Online Instruction include a commitment to the Quality Matters rubric (improved design promotes improved retention). In addition, since March 2009, WebCollege has operated with an approved list of retention strategies which are communicated to faculty via mandatory training.

6. The standards do not include the college's copyright infringement policy.

   We recommend the standards be updated to include this information.

   Institution Response

   Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient

concerns.   TMCC anticipates it will be able to implement a formal set of standards within the next six months.

The approved TMCC copyright infringement policy will be included in any formal Standards for Online Instruction.

Prevention and Monitoring: WebCollege monitors faculty practices related to copyright and the institutional policy and notifies faculty when they may be in violation.

Follow Up Response: the adopted Standards for Online Instruction include a copyright infringement statement.

7. The standards do not address the process by which online courses are evaluated by students. We were informed the current practice is to distribute course evaluation forms to students at the conclusion of the courses but that the forms are not being provided on a regular basis.

To promote consistency in this process, we recommend course evaluation procedures be included in the standards.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns.   TMCC anticipates it will be able to implement a formal set of standards within the next six months.

Student evaluations are required of every faculty member each term. Student evaluations are conducted electronically for online classes and are made available to online faculty/ students by the 7th week of each regular term and during the entire summer session.

WebCollege will ensure that a reference to the institution-wide requirement for conducting student evaluations will be included in the formal set of Standards for Online Instruction.

Prevention and Monitoring: WebCollege will continue to make the evaluations available in a timely manner each term.

Follow Up Response: as originally stated in the Institutional Response, TMCC requires student evaluations to be conducted; it would therefore be redundant to

include language in the Standards for Online Instruction. WebCollege has conducted student evaluations in its online classes since the inception of this modality of instruction in 1999. Further, the link to the student evaluation is embedded in each online course section to facilitate student access. Each term, WebCollege notifies students enrolled in online classes that the evaluation is available and should be completed.

8. The WebCollege Department is currently exploring the adoption of a distance education course review and quality assurance program. The program is well-known within the distance education field. Implementation of a program such as this would be beneficial to the long term success of the college's distance education program.

We recommend the college continue to pursue the implementation of the program. Once implemented, we recommend the program be addressed in the standards.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns. TMCC anticipates it will be able to implement a formal set of standards within the next six months.

WebCollege has joined Quality Matters and has held two training sessions for interested faculty. In addition, two staff members have received the first phase of formal training on the nationally-recognized Quality Matters rubric. Finally, TMCC has partnered with Chemeketa Community College (which is further along in adopting the QM rubric) to learn from their experiences how to best implement.

WebCollege will ensure that acknowledgement of the Quality Matters rubric will be included in any formal Standards for Online Instruction.

Prevention and Monitoring: WebCollege will continue to offer trainings, information sessions, and examples of success to its online faculty

Follow Up Response: the Quality Matters national rubric is incorporated in the adopted Standards for Online Instruction.

9. The standards have not been approved as formal or required policies. The document

serves only as a guideline from which faculty may deviate if they choose. We were

informed by WebCollege personnel that this matter is currently being reviewed by

college administration to determine whether the document should be adopted as required

policy rather than guidelines.

We recommend the WebCollege Department in conjunction with the appropriate college

administration continue to pursue the adoption of the Standards for Online Instruction as

required campus policies.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for
online instruction. The institution is engaged in efforts to develop a formal set of
standards but the process is committed to inclusiveness and a thorough vetting of salient
concerns. TMCC anticipates it will be able to implement a formal set of standards
within the next six months.

WebCollege, working with the Vice-President for Academic Affairs and Student
Services, and the Cabinet, will coordinate efforts to obtain a formal set of Standards for
Online Instruction within the audit implementation window of six months.

Prevention and Monitoring: Once adopted, the Standards will be periodically reviewed
and modified to reflect changing expectations and standards.

**Follow Up Response: as a result of the directive from the Board of Regents Audit
Committee at its September meeting, TMCC has revised and adopted the Standards
for Online Instruction. The Standards take effect with the start of the 2012 Fall
term and will be phased in during the 2012 Spring and Summer terms.**

GRADE TESTING

A sample of nine distance education courses was selected to determine whether students'

final grades, as posted to the grade book in the online application, agreed to the grades recorded

in the Student Information System (SIS), which was the official record during the audit period.

The following exceptions were noted.

1. Of 143 total student grades reviewed, 79 discrepancies were noted between the grades

    posted in the online application and SIS. Of these, 43 differed by one whole grade or

    more. No additional information was available in the online application to support the

    grades that were recorded in SIS.

2. Three of the nine classes selected did not have final grades posted in the online

    application. As a result, a comparison could not be made to the grades recorded in SIS.

    It also appeared that some assignments were not included in the grade book for these

    courses.

    As previously mentioned, grade information should be consistently and accurately posted

    to the application's grade book. For items one and two above, we also recommend that

    sufficient training be provided to faculty on the proper use of the grade book function.

    Institution Response

    Correction: Currently, TMCC has no approved or implemented set of standards for
    online instruction. The institution is engaged in efforts to develop a formal set of
    standards but the process is committed to inclusiveness and a thorough vetting of salient
    concerns.   TMCC anticipates it will be able to implement a formal set of standards
    within the next six months.
    As concerns the grade book function, the problems identified can be addressed through
    training; faculty training has been revised to emphasize corrective practices. The revised
    training will be implemented with the 2011 Fall term and be recurring thereafter.

    Prevention and Monitoring: WebCollege will monitor anticipated improvements in
    grade book consistency from the revised faculty training and modify training as
    warranted.

    **Follow Up Response: the Standards for Online Instruction have been adopted and
    include mandatory gradebook training for faculty.**

3. The college's Standards for Online Instruction state the syllabi for online courses will

    include an Americans with Disabilities Act (ADA) statement, instructor's contact

    information and explanation of how to communicate with the instructor,

acknowledgement of the college's "W" and "F" grade policy, expected student behavior

and relevance of the Student Code of Conduct policy. We noted the syllabi for seven of

the nine classes reviewed were missing one or more of these information items.

We recommend faculty be reminded of the syllabi requirements for online courses.

Institution Response

Correction: Currently, TMCC has no approved or implemented set of standards for online instruction. The institution is engaged in efforts to develop a formal set of standards but the process is committed to inclusiveness and a thorough vetting of salient concerns.   TMCC anticipates it will be able to implement a formal set of standards within the next six months

WebCollege will remind faculty of the syllabus expectations as a "best practice" pending the approval of a set of Standards for Online Instruction.

Prevention and Monitoring: WebCollege will incorporate any approved standards into required training for faculty.

Follow Up Response: the Standards for Online Instruction have been adopted. The Standards provide the basis for enforcement of various institutional and legal requirements.

STUDENT TRAINING

We were informed that some students who enroll in distance education courses have little

or no computer skills. These students require a significant amount of technical support in order

to use the online application system and are also more likely to drop courses than students with a

higher level of computer skills.

We recommend the college consider offering training on the online application to first

time distance education students or those who simply want to refresh their skills or become more

familiar in using the application.

Institution Response:

Correction: The WebCollege has been working for the past several years to determine ways to accurately assess the relevant skill-sets of new online students and to implement pathways designed to better prepare students for the virtual learning environment. To date, WebCollege has implemented a new online student orientation, is exploring a readi assessment solution to better identify students in need of additional training and preparation, and has worked to improve communication to students of the unique expectations of online learning (e.g.,Frequently Asked Questions - FAQs, and a quiz "Is DE Right for You?"). WebCollege is also exploring solutions that would engage most/all of the identified student population needing training. An earlier effort in partnership with Student Services produced lackluster results (most students signed up for needed orientation/training, but failed to attend).

Prevention and Monitoring: such expectations are included in the Quality Matters rubric and are consistent with the retention strategies adopted by WebCollege in March 2009. WebCollege will continue to implement the strategies consistent with improving student preparedness.

Follow Up Response: the Standards for Online Instruction have been adopted and Include specific expectations for students. TMCC is beta-testing SmarterMeasure a a student readiness assessment tool during the 2012 spring term. WebCollege is also developing the process for mandatory completion of the student orientation by first-time online students.

EXPENDITURES

Of 13 expenditures incurred by the WebCollege Department, no exceptions were noted

with 11. The two remaining transactions were charged to the incorrect expense category.

We recommend greater care be taken when coding expenditures.

Institution Response

Correction: The two transactions in question were: 1) a sub-object miscoding of the purchase of a laptop computer and accessories which should have been classified as "sensitive" because of the laptop computer, and 2) a sub-object miscoding of out-of-state travel as in-state travel. Both were clerical errors, and as the audit discovered, the department has normally correctly coded expenditures. The issue has been reviewed with staff and extra care will be taken in the future to ensure the correct coding is always utilized. Due to budget constraints, the WebCollege currently operates without an Administrative Assistant. Entries are done by two of the three administrative professional staff. This tends to undermine consistency when expenditures are catalogued.

Prevention and Monitoring: WebCollege has reviewed how the two entry errors likely occurred and has taken steps to ensure that consistent coding is used for all future entries.

Follow Up Response: this has been addressed by TMCC/

OTHER – LEAVE RECORDS

The leave records of two professional employees were reviewed for accuracy and proper completion. Both of the employees work in the WebCollege Department. The issues noted below are the responsibility of the TMCC Human Resources Department.

1. On nine occasions, leave request forms for annual leave were submitted and approved after the leave was taken.

2. On two occasions, leave request forms for sick leave were submitted more than three days after the employee returned to work.

   For items one and two above, we recommend employees be reminded of the college's policy for submitting leave request forms.

   Institution Response

   Correction: WebCollege staff have been reminded of the following policies related to submitting leave request forms:

   Chapter 4, Section 14
   "Insofar as possible, all leave must be requested and approved in advance by the supervisor or other appropriate administrative officer according to the policies for each type of leave as contained chapter 3 of the Handbook. The approval and recording of unanticipated leave must occur immediately after use of the leave."

   Chapter 4, Title 3, Section 22.2
   "Insofar as possible, all leave shall be requested and approved in advance by the supervisor or other appropriate administrative officer according to the policies for each type of leave as contained in this chapter of the Handbook. The approval and recording of unanticipated leave shall occur immediately after use of the leave."

   Prevention and Monitoring: WebCollege staff will be periodically reminded of college policies concerning the submission of leave request forms.

3. Monthly accruals for annual and sick leave earned by the employees were credited at the beginning of each month in the Professional Leave Accounting and Reporting Program (PLARP). Board of Regents policy states that employees accrue leave at the rate of two days for each full month of paid service which is added to any remaining balance. Only at the end of each month can it be determined whether employees worked the entire month and should be credited for the full two days.

    We recommend the PLARP system be adjusted so annual and sick leave accruals are applied at the end of the month rather than at the beginning.

    Institution Response

    Correction: Information Technology Services (ITS) and Human Resources have agreed To change the accruals to the end of each month.   The TMCC Human Resources office will notify ITS as to the timing of the change. Professional Employees will be notified that the accruals will be changed from the beginning of the month to the end of the month.   It will also be noted that if a professional employee terminates their employment prior to the end of the month accruals TMCC will pro rate the months accrual activity and post it to the account at the end of employment.

    Prevention and Monitoring: The PLARP Accruals code will be changed in the Development environment then tested and if operational it will be moved into production, no additional prevention and monitoring is required.

    Follow Up Response: at this time, the accrual change has not been completed.

4. One of the leave record reports reviewed, which was generated from PLARP, contained the employees' social security numbers. The report shows when leave requests were submitted and approved. This was also noted during an internal audit of PLARP in 2007.

    We recommend social security numbers be removed from PLARP reports.

Institution Response

Correction: Information Technology Services examined all of the reports contained within the PLARP (Leave Request) framework looking for where social security numbers were printed. One report contained the SSN and it has been removed from the report.

Prevention and Monitoring: SSN were removed from the report, no additional prevention and monitoring is required.
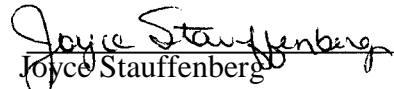
Follow Up Response: SSN were removed from the report.

The Internal Audit Department appreciates the cooperation and assistance received from

WebCollege Department and other TMCC personnel during this review.

Reno, Nevada
May 4, 2011

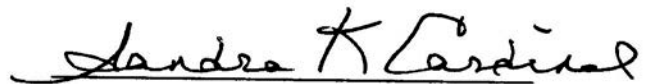Debbie L. Ottaviano
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