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## AUDIT POLICY

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- (a) - **Background:** CTEC requires curriculum providers to submit a single course for curriculum review along with the application to become an approved curriculum provider (CP02 – CTEC Curriculum Provider Application). Approved curriculum providers are also required to submit, once every three years, a single course for curriculum review during the periodic review process (CP14 – Course Review Policy). Separate approved curriculum provider applications are required for Qualified Education (QE) and for Continuing Education (CE). Curriculum providers offering both face-to-face and self-study courses are required to submit a self-study course for curriculum review.
- (b) - **Commentary:** CTEC has determined that reviewing a single course for a provider is insufficient to confirm the maintenance of the required course quality. Rather than requiring all curriculum providers to submit additional courses and be subjected to additional course review fees, CTEC has developed a course audit procedure. Courses audited under this procedure will be required to meet the same curriculum standards as a course submitted by an applicant for curriculum provider status approval. **The audit of a provider's course will not replace the periodic review requirement of CP14.**
- (c) **Audits of Face-to-face Courses:** CTEC has the discretion to audit face-to-face QE and CE courses to confirm courses are complying with CTEC educational standards.
- (d) - **Audit Selection Process:** CTEC will annually audit the five most widely used self-study CE courses based on the prior year's CTEC reporting records. CTEC shall also have the discretion to audit one or more of the top QE courses based on the prior year's CTEC reporting records. The following exceptions apply:
- (1) If a course selected for audit has been audited during either of the two prior annual audit cycles, CTEC has the discretion to exempt that course from audit for the current year's audit cycle.
  - (2) If more than one of the five most widely used courses is from the same provider, CTEC shall only audit one of those courses during the current year's audit cycle. The one selected for audit shall be the most widely used of that curriculum provider's courses.
  - (3) Where CTEC exempts a course from audit for one of the preceding reasons, CTEC shall replace that course for the current audit cycle with the next most widely used course from another provider.
  - (4) If a course selected for audit is no longer currently available to students, it shall be CTEC's option to audit a similar course currently offered or the prior year's course. **Curriculum providers may be asked to provide course evaluations as a part of the audit.** When requested, the curriculum provider will have 10 days to submit course evaluations.
  - (5) The selection of courses for audit shall be made by the Curriculum Provider Standards Committee Chair and confirmed by majority vote of the CPS committee members at a committee meeting held prior to the May Board meeting present. To facilitate the selection process:
    - (i) CTEC staff shall prepare the following reports and have them available to the CPS Chair at least four weeks prior to the May board meeting:
      - (A) A list of all current CE providers;
      - (B) A list of all current QE providers;
      - (C) A list of providers currently under periodic review;

(D) A list of the 50 top selling CE courses;

(E) A list of the 10 top selling QE courses; and

(F) A list of any complaint, mandatory or targeted audits conducted since the previous year's report

The Curriculum Provider Standards Committee Chair shall also include recommendations, if any, for targeted audits conducted pursuant to CP28(f). Consideration will be taken by providers subject to periodic review, mandatory audits and the courses selected for the "most used" audits.

**Commentary** - Targeted audits may occur at any time in the year.

**(e) - Audit as the Result of a Complaint:** Written complaints relating to course material shall be reviewed by the CPS Chair recommends whether an audit is appropriate and the reason for the audit.

**(1) CTEC Provider Complaint Form:** Complaint forms are available on the CTEC.org website. Complaints may be anonymous but must be in writing and should contain the information requested by the CTEC online complaint form.

**(2) Audit Decision:** The CPS committee shall be provided with the Curriculum Provider Standards Committee Chair recommendations and the decision whether to audit a course shall be made by majority vote of the CPS Committee at the scheduled committee meeting.

**(f) - Targeted Audits:** CTEC reserves the right to select courses for audit and to audit courses where CTEC suspects a course is not in compliance. Where the Chair of CPS, or CTEC administrative staff has reason to believe a course is being offered which does not meet CTEC educational standards violations, the Chair of CPS shall prepare a recommendation for audit, including the reasoning for presentation to the CPS committee. The CPS committee shall make the final decision whether to target audit a provider.

**(g) - Mandatory Audit:**

(1) If the IRS disqualifies a CE provider, CTEC will also disqualify the CE provider. When that occurs, if that CE provider is also a QE provider; the review staff will audit the provider's QE course.

(2) If a provider fails a CTEC review for either CE or QE, the other type of course they offer will be audited.

(3) In addition, if the provider fails either an audit or periodic review, consideration will be given to audit other courses offered by that provider.

**(h) - Audit Criteria:** Audits will review the course to determine compliance with CTEC educational standards.

**(i) - Curriculum Provider Cooperation:** A curriculum provider whose course is under audit, will, at CTEC's request, complete and return, within 10 business days of the request, a completed Provider Application Checklist for the course under audit. The request shall be made to the curriculum provider's e-mail address of record. Failure to provide the completed checklist within the required time frame will, at the discretion of CTEC, cause the provisions of CP14(c)(12)(B)(iii) to apply.

**(j) - Disqualification:** When the CTEC curriculum review staff, during an audit, determines that the course under audit does not meet CTEC standards and requirements, the provisions of CP14(c)(12)(B)(iii) shall, at the discretion of CTEC, apply. In addition, the provisions of Policy CP18 may apply as CTEC deems appropriate.

**(k) -Repetitive Disqualifications:** If a provider has more than one course disqualified in a CTEC CE reporting year, the provisions of CP18(b) or CP18(c) may apply as CTEC deems appropriate.

Approved November 16, 2012

**Responsibility: Curriculum Provider Standards Committee**