

CE Audit Procedures

The purpose of this procedure is to provide instructions on auditing approved Continuing Education (CE) courses. At a minimum, 3-8% of all approved CE courses, all active providers and instructors are reviewed, once every [insert timeframe] pursuant to NAIC guidelines. Audits consist of classroom, webinar, self-study, and desk, though no more than [insert percentage] of such audits shall be desk audits.

The following steps are performed:

- Obtain detailed information on course location for auditor.
- Make sure class is still scheduled 24 hours prior to the date of course offering.
- Pull course outline and all supporting documentation from system.
- Email authorization letter, course outline and all supporting documentation to the auditor 24 hours before the class is to begin.
- Auditor to complete prescribed audit form.
- Receive the audit paperwork back from the auditor.
- Send follow up notices as necessary.
- Forward requested documentation to [insert state], as necessary.

Once the audit is complete, the auditor will return the materials to [insert state] within ?? days of the audit.

The prescribed audit form is reviewed for any discrepancies or comments.

TASK	ACTIVITY
Initiate audit:	<ol style="list-style-type: none">1. Obtain a list of available course offerings in [insert state].2. Email auditors the list of course offerings in [insert state].3. Once auditor provides the list of course they would like to audit and compare to the completed audits file to make sure the same provider is not audited twice.

Note: This will begin the audit process.

Pull Documents:

5/8/2024

Page 1 of 5

Confidential

Commented [RT1]: Virginia audits 5% of courses.

Commented [RT2]: Virginia:

Courses are approved for a period of two years.

Courses are eligible for one 2-year renewal and must be renewed by the last day of the month they were originally approved.

After the renewal period, courses will need to go through the original approval process.

Course approvals will follow the NAIC guidelines.

Commented [RT3]: Virginia is 25%.

Commented [RT4]: Virginia uses a third-party administrator.

Commented [RT5]: Virginia uses a third-party administrator.

Commented [RT6]: Virginia 5 days.

1. Pull copies of course information, outlines, and course schedule for courses being offered.
2. Contact the provider (via telephone anonymously, for the most part) to find exact locations and dates of courses, ONLY if the provider has not entered the information in the system.

Note: Courses must be in [insert state]. Audits cannot be performed in other states. Occasionally, an additional audit may be requested directly from the state.

Review Documents:

1. Review documents pulled to be sure all copies are clear prior to forwarding to the auditor(s).
2. Add the provider to the established Completed Audits file.
3. Confirm the course start and end time with the Auditor and verify that the Auditor will conduct the audit for the entire duration of the course.
4. Forward necessary documents along with copies of the prescribed audit form to the appropriate auditor.

Receive Audits:

1. Upon receipt of completed audits, review the prescribed audit form(s) to ensure that they are complete. If not, contact the auditor and advise; follow up as necessary.

Review Audits
For Deficiencies:

Note: All notifications must be emailed to providers within five (5) days of receiving the audit reports. Review the prescribed audit form(s) as follows:

1. If there are no issues, email the provider a completed course audit letter stating that an audit was conducted and there were no violations.
2. Discrepancies:
 - a. A discrepancy notice should be sent for any "No" responses on the audit form.

- b. If the provider did not conduct an accurate attendance verification, an explanation must be provided.
 - c. If the number of credits taught is less than the number of credits approved, an explanation must be provided.
 - d. Compare outlines and supply the provider with a detailed breakdown of differences.
 - e. If a licensee who did not sit for an entire class is given credit, an explanation must be provided.
3. If no response is received from the provider within [?? business days], then a follow up letter must be sent to the provider. The letter is to be sent via **certified mail** and include a copy of the initial notice.
5. If no response is received to letter after [?? business days], forward all materials to the [insert appropriate person] for follow up.
6. [insert state or third-party administrator] will also audit the number of licensees received on banked rosters from the audited course. The auditor indicates the number of attendees on the audit form.
- a. [insert state or third-party administrator] must check to ensure that this was the number of licensees submitted on the roster.
 - b. If there is a discrepancy, send a notice to the provider questioning this finding.
 - c. If no response is received to the notice after [?? business days], forward all material to the [insert appropriate person] for follow up.
- Note:** If questions arise from the audit, forward documents to [insert appropriate person] for clarification.
7. [insert state or third-party administrator] will track receipt of the banked rosters from the audited course(s) to ensure that the provider is following through on submission.

Commented [RT7]: Virginia 10 days.

Commented [RT8]: Virginia 10 days.

Commented [RT9]: Virginia uses a third-party administrator.

Commented [RT10]: Virginia 10 days.

Commented [RT11]: Virginia uses a third-party administrator.

Commented [RT12]: Virginia uses a third-party administrator.

Note: The provider must submit the course completion roster to [insert state or third-party administrator] within ?? days of completion.

Commented [RT13]: Virginia 10 days.

Follow Up:

1. Receive class roster(s) from the provider to confirm information provided by the auditor.
2. Verify roster count and report any deficiencies to the [insert appropriate person].

Commented [RT14]: Virginia uses a third-party administrator.

To process Desk Audits of already held courses:

1. Generate a list of already banked courses within a certain time frame.
2. Email provider audit letter asking for the sign in sheet used along with the instructor's full name and instructor number.
3. Compare the list of banked students in system against the sign in sheet from the provider to make sure the same students who signed in were the same students who received credit along with the number of students and verifying the license number of each student.
4. Confirm the instructor is approved and for the course authority the course is approved for.

Note: Instructors do not have to be approved for a Single-Session course.

5. If no discrepancy, email the provider our completed course audit letter stating the audit is complete and there are no violations.
6. If there are violations list the violations in the audit letter and wait for the provider to respond in ?? days with the corrections.
7. Enter complete audit information on Desk Audit list.

Commented [RT15]: Virginia 10 days.

For Self-Study/Online Audits:

1. Obtain a list of approved self-study/Online courses within a certain time frame.

2. Email provider our audit letter asking for a user id, password, exam, and answer key to complete an audit of their self-study/online course.
3. Complete the course as a student answering the online course audit questionnaire form throughout the course until you have completed the course with a passing grade.
4. If there are no violations, email the provider our completed course audit letter stating that an online audit was completed and there were no violations.
5. If there are violations (all responses must be YES) list the violations in the audit letter and wait for the provider to respond in ?? days with the corrections.
6. Audit the course again when the provider has confirmed violations have been corrected. You may have to reach out to the provider again for a new user id and password.
7. Track completed audit information.

Commented [RT16]: Virginia 10 days.