STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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September 30, 2022

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Director, Human Resources & Development
Designated Employer Representative
Illinois Student Assistance Commission

Mr. Keshor Desai
Chief Internal Auditor
Illinois Student Assistance Commission

Ms. Julie Annette Jones Merit Board Chair State Universities Civil Service System

Accompanying this letter is the final outcome of the FY2022 State Universities Civil Service System Governance, Risk, and Compliance (GRC) Audit of the Office of Human Resources at the Illinois Student Assistance Commission, covering the period of November 1, 2017, through June 30, 2021.

We are pleased to inform you that there are no substantive findings observed during this audit period. We commend the Illinois Student Assistance Commission Office of Human Resources staff charged with this compliance responsibility for the business practices leading to this excellent report. Minor corrections observed by the Auditor were communicated to the Designated Employer Representative and promptly addressed.

Although not rising to the level of citing as an individual finding, there is one matter of concern to which we would like to draw your attention:

 One position reviewed as part of the sample of exempt positions, the Public Relations and Social Media Manager, does not appear to be properly designated. This employee was interviewed by the Auditor, and an updated position description was submitted for the record outside of the audit period. Please conduct a review of this position for proper Civil Service designation and classification consistent with current Exemption Procedures Manual requirements.

On behalf of the Legal and Compliance Services Division, we thank you and the human resource staff for a very productive audit experience. If there are any questions or a personal briefing on any item is desired, please contact me at (217) 278-3151 or Lucinda M. Neitzel, Assistant Director of Legal and Compliance Services at (217) 305-6604.

Gail Schiesser Executive Director

STATE UNIVERSITIES CIVIL SERVICE SYSTEM



Governance, Risk, and Compliance Audit Report (Final)

September 30, 2022

ILLINOIS STUDENT ASSISTANCE COMMISSION

Audit Time Frame: November 1, 2017 – June 30, 2021

> Remote Visit: August 23 – 25, 2021

Prepared by:
Assistant Director, Legal and Compliance Services

State Universities Civil Service System Legal and Compliance Services <u>Final Audit Report</u>

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State Universities Civil Service System Legal and Compliance Services Final Audit Report

Overview of Specific Areas Subject to Review

The following Human Resource topic areas are considered and reviewed when identifying the Audit Objective and Scope, Risk Assessment Categories, and Findings identified in this report:

Assignment of Positions to Class

A sample of Civil Service position descriptions is selected to ensure proper and timely updates between employees and supervisors, conduct individual desk audit interviews, and complete a review of the Employer desk audit process to ensure accurate classification determinations were assigned.

Compensation Programs

An analysis of the Employer's use of pay rates and pay ranges is completed to determine compliance with ranges approved by the Merit Board. The Employer's compensation program is evaluated to ensure merit and pay equity requirements are adequately compared to the regional market area.

Examination Program

A review of pre-employment testing procedures is conducted, including a review of admission of applicants to examinations, license and certification verifications, exam security and administration, and register maintenance.

Administration of Employment and Separation Procedures

A review of the Employer's business processes related to the Civil Service employment cycle, including the utilization of status and non-status appointments, probationary period requirements, and other employment and separation transactions, such as disciplinary suspensions, dismissals, voluntary demotions, temporary upgrades, reassignments, transfers, and dismissal from probation.

Administration and Employment Protocols of Positions Exempt from Civil Service Regulations

A review of employment protocols related to positions designated as exempt from Civil Service regulations is completed to ensure accurate designation under Merit Board procedures. The Employer's exemption method, administrative procedures, and related position descriptions are sampled, with incumbent interviews conducted to validate the assigned position exemption.

General Review of the Employer's Human Resource Program

A general review of the Employer's human resource programs is completed to determine effectiveness, efficiency, and levels of communication to internal constituency groups, including faculty, principal administrative employees, and support staff. This review may also include investigating concerns from external constituents, including the public, employee committees, and union groups.

Other Follow-up Items from the Previous Audit

A review of any follow-up items from previous audits and evaluates compliance matters deemed necessary and appropriate to meet audit objectives.

Audit Objective and Scope

Objective

As stated in the Governance, Risk, and Compliance Audit Charter for the State Universities Civil Service System, as approved by the Merit Board on August 17, 2016, the primary objective and purpose of the audit program are to evaluate and verify compliance with the Act, Code, and System Procedures. The University System is also charged with building strategic partnerships, evaluating processes and performance, providing direct guidance and support services, and implementing flexibilities that meet the needs of each employer, consistent with the Act.

Audit Scope

The Scope of this FY2022 Audit for the Illinois Student Assistance Commission included a comprehensive evaluation of employment designations and/or category of status, non-status, and exempt appointments; register maintenance and management; position audits and description review for Civil Service and Exempt appointments; and personnel file reviews and documentation.

Risk Assessment Categories

Topics of Specific Focus by Rick Assessment Category

Before performing audit functions, specific risk assessments were assigned and categorized for each topic area reviewed during the compliance audit process. The Auditor considers the following factors when determining the appropriate level of compliance violation and course of action:

- Repeat Breaches of the Act, Code, Procedure, or Audit Charter
- Multiple Instances of Non-Compliance
- Employer's Ability and Willingness to Operate in Compliance with the Law
- Employer's Historical Compliance Record
- Employee Concerns

Audit findings are defined and issued based on these designated and predetermined risk assessments as follows:

- Category 1: Serious Impact/Immediate Action Required
- Category 2: Medium Impact/Needs Improvement
- Category 3: Minimal Impact/Observation Only

For the current FY2022 Governance, Risk, and Compliance Audit at the Illinois Student Assistance Commission, the following risk assessments and areas of focus were communicated to the Employer before conducting the audit examination:

Category I: Identification of Civil Service Classifications Used, Use of Approved Rates and Ranges, Admission of Applicants to Examination, Examination Security Protocols, Register Referral of Candidates and Register Maintenance, Layoff Transactions, Specialty Factor Designations, Extra Help Appointments, and Temporary Upgrade Assignments.

Category II: Position Control Management, Removal of Names from Registers, Maintenance of Personnel Files, Temporary PAA Assignments, and Transaction Documents (Intern Requests, Disciplinary Suspensions, Dismissals, and Layoff Notices) on file at the University System Office.

Category III: Civil Service Desk Audits, Position Description Reviews, Timeliness of Classification Requests (Desk Audits), and Scheduling/Inventory of Examinations.

The Legal and Compliance Division recognizes and identifies these three categories of findings based on the facts presented by the Employer during the audit process, which are then evaluated against requirements consistent with regulatory guidelines. The Category assigned to a documented finding depends on the severity of the issue and its impact related to a violation of the Act, Code, or Procedure.

NOTE: The university system is responsible for protecting private and sensitive employee information from loss or misuse. As a result, personal information, as defined in the Illinois Freedom of Information Act (FOIA), 5 ILCS 140/2(c-5), and other sensitive employee and position data including, but not limited to pre-employment application information, examination scores, register referrals, salary, and specific disciplinary information, are not included in this report.

Illinois Student Assistance Commission Final Audit Report

Executive Summary YEAR ENDED—FY2022

The compliance testing performed during this examination was conducted in accordance with State Universities Civil Service Act (110 ILCS 70/36b et seq.), Part 250 of the Illinois Administrative Code (Code) (80 III. Adm. Code 250), State Universities Civil Service Procedures Manuals, applicable University/Agency policies/procedures, and auditing standards.

SUMMARY

Number of	This Report
Positive Observations	0
Category 1 Findings	0
Category 2 Findings	0
Category 3 Findings	0
Repeated findings from previous audit®	0