STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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April 8, 2009

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The State Universities Civil Service System respectfully submits the Final Audit Report of the Biennial Institutional Compliance Audit conducted at Illinois State University. The audit period tested was January 1, 2006 through April 30, 2008. This report is intended to communicate the final material findings, recommendations and corresponding institutional responses formulated through a comprehensive human resource compliance and operational audit.

On behalf of the audit staff, 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 call Jeff Brownfield at (217) 278-3150 ext. 236.

Lewis T. (Tom) Morelock

Executive Director



State Universities Civil Service System Compliance Audit

April 8, 2009

Audit Period
January 1, 2006 to April 30, 2008

Prepared by:

Jeff Brownfield Assistant Director

Table of Contents

Introduction	
Executive Summary	
Material Findings, R	ecommendations, and Institutional Corrective Action Plans
Appendices	
	Employees Paid Outside of Approved Salary Ranges
Appendix B:	Extra Help Appointments Exceeding the 900-Hour Rule
Appendix C:	Extra Help Positions Exceeding the 900-Hour Rule
Appendix D:	Extra Help Employees Paid Beyond Limitations and Available Hours

Introduction

PURPOSE

The State Universities Civil Service System was created in 1952 as a separate entity of the State of Illinois and is under the control of the University Civil Service Merit Board as set forth in Section 36b(3) of the State Universities Civil Service Act (Act) (110 ILCS 70/36b(3)). The purpose of the State Universities Civil Service System is to establish a sound program of personnel administration for its constituent employers (110 ILCS 70/36b(2)). To achieve this purpose, the Merit Board has been given a broad range of statutory powers and duties, which include the power to make rules to carry out the purpose of the State Universities Civil Service System and to appoint an Executive Director to administer the Act (110 ILCS 70/36d(11) and (12)).

As part of its statutory power, the Merit Board has promulgated rules that delegate to the Executive Director the authority and responsibility for conducting "ongoing audit programs of all Civil Service operations at all places of employment for the purpose of assuring compliance with the [Act (110 ILCS 70/36b et seq.)] and [Part 250 of the Illinois Administrative Code (Code) (80 Ill. Adm. Code 250)] and for improving the programs of personnel administration of its constituent employers" (80 Ill. Adm. Code §250.140(c)).

This report communicates the final outcome of a comprehensive human resource operational audit, which included an on-site evaluation that was conducted on August 4-8, 2008. An exit conference conducted March 26, 2009 provided an opportunity for the Employer to discuss both the Material and Non-material findings contained in the initial Draft Audit Report. Upon completion of the exit conference and submission of the Institutional Corrective Action Plan, a Final Audit Report (Material Findings only) is sent to the Employer and a Supplemental Report (Non-material Findings) is sent to the campus/agency Human Resource Office for internal use.

OVERVIEW

The following Human Resource activities were reviewed and utilized in identifying the Material (Final Audit Report) and Non-material Findings (Supplemental):

Assignment of Positions to Classes

The Auditor completes a review of selected job descriptions for timely updates, proper administration, and correct assignment of position classifications. Additional desk audits of selected positions are conducted onsite for appropriateness of position classifications. There is also an evaluation of the Employer's desk audit process and conclusions during the time span audited.

Compensation Programs

The Auditor completes an analysis of the Employer's use of pay rates and pay ranges approved by the Merit Board. An overall evaluation is then conducted of the Employer's compensation program and initiatives to meet requirements of pay equity within the Employer's market area.

Examination Program

The Auditor conducts a review of pre-employment testing operations. This includes test administration, admission procedures of applicants to examinations, license and certification verifications, scheduling, and security.

Administration of Employment and Separation Procedures

The Auditor reviews the Employer's business processes and procedures related to the employment cycle, including pre-employment activities, probationary and status employment, and employment separation programs. There is also an assessment of the Employer's utilization and monitoring of non-status appointments.

• Administration and Employment Protocols of Principal Administrative Appointments (PAA)

The Auditor completes a review of the employment protocols and assigned responsibilities for Principal Administrative Appointments. This review is conducted to assure compliance with the exemption authorization provided to each employer. The Employer's exemption forms and related position descriptions are reviewed and selected incumbent interviews are conducted for further validation of approved exemption. The audit process also includes a review of the Employer's administrative procedures related to these appointments and their approved exemption status.

General Review of the Employer's Human Resource Program

The Auditor completes a general review of the Employer's human resource programs with respect to effectiveness, efficiency and levels of communication to constituencies. There is also an assessment of the recognition and interaction of human resource programs within the Employer's faculty, administrative and support staff employee groups. The impact of new technology on the recordkeeping and processing of information is also an element for review.

• Other Follow-up Items from Previous Audit

Other follow-up items from previous audits, as well as other matters deemed necessary and appropriate, may have been reviewed and submitted as additional audit subjects.

The following staff members from the System Office, Audit and Advisory Services Division, were directly responsible for conducting various aspects of the audit:

Jeff Brownfield, Assistant Director
Lucinda Neitzel, Audit and Advisory Services Manager
Roger Frick, Human Resource Officer
Paula Mitchell, Human Resource Assistant

Executive Summary

April 8, 2009

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 Ill. Adm. Code 250), State Universities Civil Service Procedures Manuals, applicable University/agency policies/procedures, and auditing standards.

SUMMARY OF MATERIAL FINDINGS

Number of	This Report
Findings	6
Repeated findings from previous audit®	2®

SCHEDULE OF MATERIAL FINDINGS

Item <u>Number</u>	<u>Page</u>	Description
ISU FY09-01	4	FINDINGS (STATE UNIVERSITIES CIVIL SERVICE ACT) Failure to Admit Applicants to Examination Who Meet Minimum Acceptable Qualifications
ISU FY09-02	8	Admission of Applicant to Civil Service Examination Who Did Not Meet Minimum Acceptable Qualifications
ISU FY09-03	11	Employees Paid Outside of Approved Salary Ranges
ISU FY09-04	13	Exemption Authorization Applied to Positions That Match Civil Service Classification Specifications®
ISU FY09-05	16	FINDINGS (ILLINOIS ADMINISTRATIVE CODE) Non-Compliance with Extra Help Employment and Position Limitations®
ISU FY09-06	20	FINDINGS (SUCSS PROCEDURE MANUALS) Unauthorized Transition of Civil Service Employees/Positions to Principal Administrative Appointments Within the Same Organizational Unit

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-01 Failure to Admit Applicants to Examination Who Meet Minimum

Acceptable Qualifications

Criteria/Standards (i.e., what should exist):

- 1) State Universities Civil Service Act (Act), Section 70/36b(2)
- 2) State Universities Civil Service Act (Act), Section 70/36d(5-7)
- 3) Illinois Administrative Code (Code), Section 250.50(a) Kinds of Examinations
- 4) Illinois Administrative Code (Code), Section 250.50(b)(1) Examinations

Section 70/36b(2) of the Act states "The purpose of the University System is to establish a sound program of personnel administration for the Illinois Community College Board, Southern Illinois University, Chicago State University, Eastern Illinois University, Governors State University, Illinois State University, Northeastern Illinois University, Northern Illinois University, Western Illinois University, University of Illinois, State Universities Civil Service System, State Universities Retirement System, the Illinois Student Assistance Commission, and the Board of Higher Education. All certificates, appointments, and promotions to positions in these agencies and institutions shall be made solely on the basis of merit and fitness, to be ascertained by examination, except as specified in Section 36e."

Section 70/36d(5) of the Act refers to Power and duties of the Merit Board, "To prescribe standards of examination for each class, the examinations to be related to the duties of such class. The Merit Board shall have power to delegate to the Director and his staff the preparation, conduct and grading of examinations. Examinations may be written, oral, by statement of training and experience, in the form of tests of knowledge, skill, capacity, intellect, aptitude; or, by any other method, which in the judgment of the Merit Board is reasonable and practical for any particular classification. Different examining procedures may be determined for the examinations in different classifications but all examinations in the same classification shall be uniform."

Section 70/36d(6) of the Act refers to Power and duties of the Merit Board, "To authorize the continuous recruitment of personnel and to that end, to delegate to the Director and his staff the power and the duty to conduct open and continuous competitive examinations for all classifications of employment."

Section 70/36d(7) of the Act refers to Power and duties of the Merit Board, "To cause to be established from the results of examinations registers for each class of positions in the classified service of the State Universities Civil Service System, of the persons who shall attain the minimum mark fixed by the Merit Board for the examination; and such persons shall take rank

upon the registers as candidates in the order of the relative excellence as determined by examination, without reference to priority of time of examination."

Section 250.50(a) of the Code states, "Kinds of Examinations. Examinations shall be of two kinds: original entry and promotional. Both kinds shall be open and continuous competitive examinations."

Section 250.50(b)(1) of the Code states, "Eligibility to Compete in Examinations. Any citizen or resident of the State of Illinois, who applies for examination in a specific class at a constituent place of employment served by the System, who is not rejected or disqualified under subsection (c), and who meets the minimum qualifications as prescribed in the class specification, shall be admitted to such examination. For classes requiring valid licenses or certificates, an applicant must show possession of such license or certificate at, or prior to, time of taking the examination."

Conditions/Facts (i.e., what actually exists):

Upon review of the application process, testing procedures, and corresponding employment registers to verify the proper admittance to testing and referral to positions, the Auditor discovered instances where applicants were required to meet both the standard Minimum Acceptable Qualifications (MAQs) prescribed by the University System Class Specification and 'preferred qualifications' designated by the Employer through the electronic application process. Applicants that did not meet both the prescribed MAQs and the 'preferred qualifications' were not admitted to test for the designated classification.

This topic was previously discussed with the Employer in April 2007. In May 2007, the University System Office sent correspondence to the Employer indicating that all applicants meeting the MAQs, as prescribed in the classification specifications, must be allowed to complete a requested examination. Aspects of that correspondence indicated that 'preferred qualifications' requiring skills or knowledge that exceed the MAQs have the affect of inappropriately disqualifying applicants from the examination process and are inconsistent with the State Universities Civil Service Act, the Illinois Administrative Code, and other related System Office procedures.

Cause (i.e., why deficient condition occurred):

The Employer's representative indicated that the preferred qualifications were necessary for the successful completion of duties assigned to the specific vacant position.

Effect (i.e., impact of the problem):

Any citizen or resident of the State of Illinois, who applies for examination in a specific class at a constituent place of employment served by the System, who is not rejected or disqualified, and who meets the minimum qualifications as prescribed in the class specification, shall be admitted to such examination. The failure to strictly maintain personnel transactions within defined guidelines unfairly and discriminately limits or expands the applicant pool, awarding positions and employment opportunities on a faulty premise.

In this instance, the practice of requiring applicants to meet 'preferred qualifications' contradicts the very basis of a merit-based system and is inconsistent with corresponding rules and regulations in this respect. Consequently, otherwise qualified applicants were unfairly and discriminately eliminated from testing opportunities and employment pools. Such action has a potentially significant liability consequence.

Finding from Previous Audit:

No findings in this topic area were made during the last operational audit in FY2006.

Recommendation:

It is recommended that the Employer implement policies and procedures to insure that all applicants who meet the Minimum Acceptable Qualifications (MAQs) prescribed by any designated classification specification are admitted to examination, as required by the State Universities Civil Service System classification plan management protocols. Employer policies and procedures must also insure that applicants are not required to meet additional 'preferred qualifications', as designated by the Employer, unless specifically authorized by the University System Office.

Most specifically, it is recommended that the Employer's electronic application processing instrument should be modified to accommodate the strict employment protocols and application processing procedures prescribed through the State Universities Civil Service Act, Code, and Procedures. Additionally, it is recommended that the Employer review the employment and application processing activities conducted during this audit time frame and allow access to the testing process to those applicants who met the MAQs for specified positions, but who were otherwise unfairly denied access based on their failure to meet 'preferred qualifications'.

Please note that if a specific position requires specialized skills or abilities, the Employer may contact the University System Office and request a Specialized Position Certification (Specialty Factor) for the position or group of positions. This process allows the Employer to interview and select only those applicants who possess the MAQs and any additional experience or training as authorized through this process. It is suggested that the Employer utilize this formal process as prescribed for those positions that truly require additional specialized skills or abilities.

Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice President for Human Resources

We agree with the recommendation from the auditor to admit applicants for testing who meet the Minimum Acceptable Qualifications (MAQs), and we have implemented changes to the qualification process for applicants. Applicants who apply to a posting and meet the MAQ's are invited to test.

We do not agree with the recommendation from the auditors for Illinois State University to review the application records since January 1, 2006 and contact applicants for testing who might have been disqualified. In the past, whenever an applicant who was disqualified for not meeting MAQs has questioned that decision, Illinois State University HR has reevaluated that

applicant's qualifications. If that reevaluation indicates that the applicant did in fact meet the MAQs, we have then allowed testing for the applicant.

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-02

Admission of Applicant to Civil Service Examination Who Did Not Meet Minimum Acceptable Qualifications

Criteria/Standards (i.e., what should exist):

- 1) State Universities Civil Service Act (Act), Section 70/36b(2)
- 2) State Universities Civil Service Act (Act), Section 70/36d(5-7)
- 3) Illinois Administrative Code (Code), Section 250.50(a) Kinds of Examinations
- 4) Illinois Administrative Code (Code), Section 250.50(b)(1) Examinations

Section 70/36b(2) of the Act states "The purpose of the University System is to establish a sound program of personnel administration for the Illinois Community College Board, Southern Illinois University, Chicago State University, Eastern Illinois University, Governors State University, Illinois State University, Northeastern Illinois University, Northern Illinois University, Western Illinois University, University of Illinois, State Universities Civil Service System, State Universities Retirement System, the Illinois Student Assistance Commission, and the Board of Higher Education. All certificates, appointments, and promotions to positions in these agencies and institutions shall be made solely on the basis of merit and fitness, to be ascertained by examination, except as specified in Section 36e."

Section 70/36d(5) of the Act refers to Power and duties of the Merit Board, "To prescribe standards of examination for each class, the examinations to be related to the duties of such class. The Merit Board shall have power to delegate to the Director and his staff the preparation, conduct and grading of examinations. Examinations may be written, oral, by statement of training and experience, in the form of tests of knowledge, skill, capacity, intellect, aptitude; or, by any other method, which in the judgment of the Merit Board is reasonable and practical for any particular classification. Different examining procedures may be determined for the examinations in different classifications but all examinations in the same classification shall be uniform."

Section 70/36d(6) of the Act refers to Power and duties of the Merit Board, "To authorize the continuous recruitment of personnel and to that end, to delegate to the Director and his staff the power and the duty to conduct open and continuous competitive examinations for all classifications of employment."

Section 70/36d(7) of the Act refers to Power and duties of the Merit Board, "To cause to be established from the results of examinations registers for each class of positions in the classified service of the State Universities Civil Service System, of the persons who shall attain the minimum mark fixed by the Merit Board for the examination; and such persons shall take rank

upon the registers as candidates in the order of the relative excellence as determined by examination, without reference to priority of time of examination."

Section 250.50(a) of the Code states, "Kinds of Examinations. Examinations shall be of two kinds: original entry and promotional. Both kinds shall be open and continuous competitive examinations."

Section 250.50(b)(1) of the Code states, "Eligibility to Compete in Examinations. Any citizen or resident of the State of Illinois, who applies for examination in a specific class at a constituent place of employment served by the System, who is not rejected or disqualified under subsection (c), and who meets the minimum qualifications as prescribed in the class specification, shall be admitted to such examination. For classes requiring valid licenses or certificates, an applicant must show possession of such license or certificate at, or prior to, time of taking the examination."

Conditions/Facts (i.e., what actually exists):

Upon review of the application process, testing procedures, and corresponding employment registers to verify the proper admittance to testing and referral to positions, the Auditor discovered one incident in which a candidate, who did not possess the Minimum Acceptable Qualifications required for the classification, was tested, referred for a vacancy and ultimately hired into the vacant position.

Cause (i.e., why deficient condition occurred):

The Employer's representative indicated that the person was admitted in error during a search to fill a current vacancy.

Effect (i.e., impact of the problem):

The failure to strictly maintain personnel transactions within defined guidelines unfairly and discriminately limits or expands the applicant pool, awarding positions and employment opportunities on a faulty premise.

In this instance, the failure to insure that all applicants had met the minimum acceptable qualifications for the position unfairly expanded the applicant pool and limited the opportunity for otherwise qualified candidates. Such action has a potentially significant liability consequence, especially when an appointment of a nonqualified applicant has been made.

Finding from Previous Audit:

No findings in this topic area were made during the last operational audit in FY2006.

Recommendation:

It is recommended that the Employer immediately implement practices and procedures to strictly adhere to testing/employment protocols by insuring that all applicants admitted to examinations have met the appropriate Minimum Acceptable Qualifications (MAQs).

Please note that, in some instances, the Employer may request a Compensatory Qualification or Waiver of Qualification from the System Office to allow access to testing and employment opportunities for candidates who have not met some of the MAQs, but who possess some other identified training or experience component that may compensate for this deficiency.

<u>Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice President for Human Resources</u>

We agree and will adhere to testing/employment protocols.

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-03 Employees Paid Outside of Approved Salary Ranges

Criteria/Standards (i.e., what should exist):

- 1) State Universities Civil Service Act (Act), Section 36d(3)
- 2) State Universities Civil Service Act (Act), Section 36k(1)
- Pay Administration Procedures Manual, Example 1.1e Statewide Salary Data Processing System

The Merit Board is empowered to prescribe the range of compensation for each class or to fix a single rate of compensation for employees in a particular class and can prescribe different ranges or rates of compensation for different places of employment within the State. The Statewide Salary Data Processing System, as described in the Pay Administration Procedures Manual, is the instrument by which pay rates and ranges are submitted and authorized. This System also reconciles actual salary data with approved compensation ranges for each classification utilized by each System Employer. This reconciliation process captures those employees being paid outside of approved salary ranges and lists them in an Exception Report. These Exception Reports are then provided to the appropriate University for review and possible action.

Conditions/Facts (i.e., what actually exists):

A total of 1,455 employee salaries were tested to determine if they were being paid within approved salary ranges. As identified in the Exception Report from the Fall 2007 Salary Survey, three (3) classifications with at least one or more employees were paid below the minimum established rate/range, ultimately a total of four (4) employees were found to be paid below the approved minimum salary rates. A total of thirty-four (34) employees were paid above the approved maximum salary rates. These employees, their current rates, and the approved ranges are listed in Appendix A.

Cause (i.e., why deficient condition occurred):

According to the Employer, the underpayment of four (4) employees was an administrative oversight at the time negotiated rates were being adjusted. The Employer has corrected past hourly payments to those four (4) employees and provided proper retroactive compensation for the hours paid below the approved rate.

Payment of employees compensated above the maximum rates for their respective class was also acknowledged as an oversight that occurred during the transition time between a previous HR Manager's retirement and the assignment of this task to other employees.

Effect (i.e., impact of the problem):

The Employer risks significant financial liability when failing to properly compensate employees within prescribed standards. Additionally, inaccurate salary information negatively impacts the credibility and integrity of the Statewide Salary Data Processing System (SSDPS), which is utilized by the entire system in their compensation management program.

Finding from Previous Audit:

No findings in this topic area were made during the last operational audit in FY 2006.

Recommendation:

We recommend that the Employer thoroughly review their civil service salary submission and approval process, implementing any identified process improvements. We also recommend that the Employer promptly review and reconcile their Salary Survey discrepancies as listed in any future Exception Report issued through the SSDPS. This action should insure that all employees are compensated within the approved rate/range and that accurate information is reflected in SSDPS.

<u>Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice</u> <u>President for Human Resources</u>

We agree and are currently reviewing our salary information and sending updates as needed for approval via the NIU adjustment sheet. This will ensure the integrity of the salary information used for the SSDPS.

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-04

Exemption Authorization Applied to Positions That Match Civil Service Classification Specifications

Criteria/Standards (i.e., what should exist):

- 1) State Universities Civil Service Act (Act), Section 36(e) Coverage
- 2) Illinois Administrative Code (Code), Section 250.30(a) Coverage
- Principal Administrative Appointments Procedures Manual, Section 1.3 Exemption Procedures
- Principal Administrative Appointments Procedures Manual, Section 1.5 Reviews of Exempted Positions
- Principal Administrative Appointments Procedures Manual, Section 1.5a PAA Job Description Form
- 6) Principal Administrative Appointments Procedures Manual, Section 1.8 Changing a Principal Administrative Appointment (PAA to a Civil Service Position)

These guidelines provide that all positions are Civil Service, except as categorically outlined. Exemptions are allowed in accordance with procedures requiring either documented exemption approval from the System Office or verification of exemption authorization through the position descriptions when standard titles are used. Accordingly, a periodic review and update of position descriptions is required to confirm that these exemption authorizations remain valid.

The Principal Administrative Appointments Procedures Manual, Section 1.8, states that "Periodic job description review and update procedures may indicate that a position originally identified as a Principal Administrative Appointment (PAA) may have incorrectly been classified or may have changed to the point whereby a department now must convert this position, and any employee currently in this position, to an identified and appropriate Civil Service classification."

Conditions/Facts (i.e., what actually exists):

Through a review of position descriptions for approximately seventy-three (73) exempt Principal Administrative Appointments (PAA), including on-site interviews with various employees in these positions, it was determined that eight (8) of these exempt appointments were performing duties matching the specifications of various Civil Service classifications. These positions are listed below, along with the corresponding Civil Service classification match.

Position #	PAA Title	Civil Service Classification Match
232	Specialist, Financial Aid	Financial Aid Adviser Series
		(Financial Aid Adviser III)

3839	Coordinator, Financial Aid	Financial Aid Adviser Series (Financial Aid Adviser III or IV)
3383	Coordinator, Recreation Services	Intramural and Recreation Coordinator
2992	Assistant Director, Alumni Relations	Assistant Director of Alumni Relations
1618	Specialist, Computer Support	Microcomputer Support Specialist or Information Technology Support Associate
831	Assistant to Director, Social Science Instructional Tech.	Local Area Network (LAN) Support Series or Information Technology Technical Associate
2404	Coordinator, Public Service Programs	Library Series (Library Specialist)
3445	Program Coordinator, Public Service	Events Administrator Series

Cause (i.e., why deficient condition occurred):

According to the Employer, 'standard' PAA titles approved for use by the System Office were applied to the majority of the exempted positions.

Effect (i.e., impact of the problem):

A failure to establish appropriate classification plan management protocols that properly update, analyze and evaluate PAA position descriptions leads to inappropriate exemption authorizations, the failure to follow prescribed civil service employment protocols, and non-compliance with the Act, Code and Procedures. Consequently, positions are improperly identified and appropriate Civil Service protocols circumvented, significantly increasing the possibility of various employment complaints and corresponding employment issues.

Finding from Previous Audit:

The Auditor identified three 36e(3) PAA positions that appeared to be performing duties and responsibilities comparable to those found in Civil Service classification(s) in FY2006. [Finding Code FY06, pages 12-14]

Recommendation:

In accordance with the statutory intent and basic premise contained in <u>Section 36e</u> of the Act and other related procedures, the assignment of positions to Civil Service classifications when the position description matches appropriate classification specifications must take precedence over the use of PAA exemptions through the <u>Standard Titles</u>.

We recommend that the Employer complete an in-depth review of the position descriptions listed above to further determine if they meet the specifications of the recommended Civil Service classifications. If it is determined that these positions match the specifications of the recommended Civil Service classifications, they should be transitioned to a Civil Service appointment as soon as possible, but no later than at such time that these positions become

vacant again. We refer the Employer to the <u>Principal Administrative Appointments Procedures Manual</u>, Section 1.8, Changing a <u>Principal Administrative Appointment (PAA to a Civil Service Position)</u>, for guidance should they decide to move any of these positions immediately.

The Employer may also utilize the Pilot Program classification designations and transition the positions to be reviewed to one of these classifications if appropriate. These <u>Pilot Program</u> classifications utilize more flexible employment protocols and would offer a more transparent transition.

<u>Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice President for Human Resources</u>

We agree, and Illinois State University will flag these positions and conduct a thorough review of them at the time they become vacant to determine proper classification.

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-05 Non-Compliance with Extra Help Employment and Position Limitations

Criteria/Standards (i.e., what should exist):

- 1) Illinois Administrative Code (Code), Section 250.70(g) Extra Help Appointments
- 2) Employment and Separation Procedures Manual, Section 2.10 Extra Help Appointments

Guidelines for Extra Help positions and Extra Help appointments are contained in the Illinois Administrative Code. An Extra Help appointment may be made, by an employer to any position for work which the employer attests to be casual or emergent in nature, and which meets the following conditions:

- A) the amount of time for which the services are needed is not usually predictable;
- B) payment for work performed is usually made on an hourly basis; and
- C) the work cannot readily be assigned either on a straight-time or on an overtime basis to a status employee.

"An Extra Help position may be utilized for a maximum of 900 hours of actual work in any consecutive 12 calendar months. The employer shall review the status of the position at least every three calendar months. If at any time it is found that the position has become an appointment which is other than Extra Help, the employer shall terminate the Extra Help appointment. If an Extra Help position has accrued 900 consecutive hours, the position shall not be reestablished until six (6) months time has elapsed from the date of the termination of the position."

For Extra Help employees, "Upon working 900 hours, an Extra Help employee cannot resume employment in any Extra Help appointment at a place of employment until thirty (30) calendar days have elapsed."

The employer's responsibility as noted in the Code is that the "...employer shall review the status of the position at least every three calendar months. If at any time it is found that the position has become an appointment which is other than Extra Help, the employer shall terminate the Extra Help appointment." Understanding the need for continued temporary assistance, Extra Help extensions are allowed in specific instances in accordance with procedural guidelines.

Conditions/Facts (i.e., what actually exists):

The Auditor reviewed 1,857 Extra Help appointments and corresponding information provided by the Employer. Following an initial review of the payroll documents, it was determined that 378 of these Extra Help appointments were duplicate entries. Of the remaining 1479 Extra Help

appointments, it was determined that 331 entries could not be properly analyzed for position utilization due to the failure to provide position numbers for these appointments. Therefore, it appears that, in these instances, Extra Help positions could have been utilized for far more than the 900 hour limitation within the prescribed 12-month period.

As documented in Appendix B, it was determined that eleven (11) individual employees were also found to have worked beyond the 900 hour Extra Help limitation without the required 30-day break in service.

As documented in Appendix C, it was also determined that thirty-five (35) Extra Help positions were utilized for more than 900 hours of actual work within a 12 month period without a six month lapse. While twenty-seven (27) of these positions listed had one incumbent assigned to a specific number, the remaining eight (8) positions frequently had several incumbents employed through them at the same time.

As documented in Appendix D, fifteen (15) Extra Help employees were listed in the Employer's payroll document as working an improbable number of hours for the designated time frame. This information was not identified or sorted by any pay code other than 'hours worked' and could only be interpreted to indicate that these positions and employees were utilized beyond the 900 hour limitation.

Cause (i.e., why deficient condition occurred):

Based on a thorough review of the Employer's payroll documents, it is evident that, in several instances, Extra Help appointments and positions were not properly managed and monitored. Most importantly, it also appears that the required six month lapse before a position can be reestablished has not been followed, resulting in the extended use of positions beyond the 900 hour restriction.

Regarding the employees listed in Appendix D who worked an improbable number of hours during the designated time frame, the Employer's response was that some of these employees were interpreters assigned to the Office of Disability Concerns who were compensated for mileage/travel by converting those reimbursements into actual 'hours worked' and processed through the hourly payroll process.

Effect (i.e., impact of the problem):

The Employer's current position management practices in this respect made it difficult to determine whether or not an Extra Help employee has exceeded employment limitations and should be terminated. In many instances, Extra Help positions were utilized longer than allowed, impacting the overall employment environment, which is inconsistent with the Code and Employment and Separation Procedures Manual.

With regard to the Extra Help appointments listed in Appendix D, reimbursing an employee for travel/mileage, or other types of reimbursements, through an hourly payroll process results in an inability to properly document 'actual' hours worked, leading to a determination of over-utilization for these Extra Help employees/positions and a failure to meet specific requirements

under the <u>Illinois Administrative Code (Code)</u>, <u>Section 250.70(g) Extra Help Appointments</u> and <u>Employment and Separation Procedures Manual</u>, <u>Section 2.10 Extra Help Appointments</u>.

Though outside the scope of this audit process, there is some concern regarding the practice of converting and reimbursing a mileage/travel payment through the hourly payroll process. It would seem that basic recordkeeping practices and regulations under the Fair Labor Standards Act (FLSA), the Internal Revenue Service (IRS), and other state procurement and travel laws would apply in these instances. We are aware that various regulations require proper records to be maintained and processes followed, including properly identifying information about employees, precisely capturing specific data regarding hours worked and wages earned, and appropriately designating and disbursing funds from budget line items designated for specific purposes. It would seem that converting and processing mileage/travel reimbursements through an hourly payroll process, and possibly subjecting all hours to withholding requirements, may pose some inconsistency with various regulations in this regard. According to the Employer representative, there is not a campus policy regarding the conversion of a recognized mileage or travel reimbursement to a payroll processing option. This practice certainly created a dilemma with respect to the Extra Help guidelines contained in our Code and Procedures.

Finding from Previous Audit:

The Auditor reviewed 1,018 Extra Help Appointments utilized within the time span of the audit. Nine appointments did not meet compliance standards. [Finding Code FY06, page 10]

Recommendation:

We recommend that the Employer identify and implement additional position management protocols that will adequately monitor and regulate Extra Help positions, and employees assigned to those positions, in accordance with the Illinois Administrative Code (Code), Section 250.70(g) Extra Help Appointments and Employment and Separation Procedures Manual, Section 2.10 Extra Help Appointments. It is also recommended that the Employer review their policy and practice of paying mileage/travel reimbursements through the standardized hourly payroll process, incorporating procedures that will adequately monitor and determine the level of utilization for Extra Help employee/positions being reimbursed in this fashion.

To reduce the frequency of these findings, the Employer may also be able to utilize Extra Help Extensions, when applicable, and/or conduct an operational analysis to determine if there is a need for the creation of status appointments in instances where there is a long term extensive use of these positions for similar job assignments.

<u>Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice President for Human Resources</u>

We agree and recognize the importance of the 900-hour rule, and we will adhere to that limit in the future. We will provide supervisors with reports on number of hours worked for extra help employees in their departments. Each supervisor will be informed when hiring an extra help employee of the 900 hour rule.

With regard to the extra help interpreters, Illinois State University is simply following the process established for payment by our Comptroller's Office. The process was established in 2003. The Comptroller's Office determined that mileage reimbursement cannot be deducted on a tax return, so it is considered compensation and, therefore, a taxable income. We have been recording and paying mileage for the extra help interpreters since then. With the new HRIS system that Illinois State University has purchased, we expect that the actual working hours can be separated from the mileage hours for future audits.

Material Findings, Recommendations, and Institutional Corrective Action Plan

ISU FY09-06

Unauthorized Transition of Civil Service Employees/Positions to Principal Administrative Appointments Within the Same Organizational Unit

Criteria/Standards (i.e., what should exist):

 Principal Administrative Appointments Procedures Manual, Section 1.2 Position Standards

Exemption from civil service standards are allowed in accordance with the <u>Principal Administrative Appointments Procedures Manual, Section 1.2 Position Standards</u>. These guidelines provide that System Office approval is required prior to the transition of any civil service position (vacant or encumbered) to a principal administrative appointment within the same organizational unit or when a current Civil Service employee is to be employed in an exempt Principal Administrative Appointment (PAA) position in the same organizational unit.

Conditions/Facts (i.e., what actually exists):

It was determined that the following three (3) civil service employees/positions were converted to an exempt PAA within the same organizational unit prior to obtaining System Office approval.

Position #	Original Civil Service Classification	PAA Title
1827	Business Administrative Associate	Director, Fiscal Management and Planning
708	Networking Manager	Director, Telecommunications
3309	MC Support Specialist III	Coordinator, Computer User Service

System Office approval for these conversions was not secured as required. This procedure is one aspect of the campus PAA exemption authorization process that is inconsistent with System Office requirements.

Cause (i.e., why deficient condition occurred):

According to the Employer, standard employment processes are followed for PAA vacancies within the same organization.

Effect (i.e., impact of the problem):

Failure to follow System procedures may result in unauthorized conversions and is considered a technical compliance violation. In situations where the vacant civil service position is either not filled or deleted, the results are a decrease in total Civil Service employee count and an increase in total PAA employee count. In these isolated inner-departmental PAA exemptions, the

Employer has not been extended the final authority to conduct these transactions. The continued movement of positions/incumbents may lead to improper position management and the failure to apply appropriate statutory employment obligations.

Finding from Previous Audit:

No findings in this topic area were made during the last operational audit in FY2006.

Recommendation:

If Civil Service employees and/or positions are being converted to exempt PAA status in the same operating unit, the Employer is required to seek authorization through the System Office prior to implementing this personnel transaction, in accordance with current System procedures. The Employer is asked to follow these guidelines in future transactions of this nature.

<u>Institutional Corrective Action Plan—provided by Ira Schoenwald, Associate Vice President for Human Resources</u>

We agree and will follow the appropriate guidelines established in the future.

Appendix A

Employees Paid Outside of Approved Salary Ranges

Position Number	Employee's Name	Employee's Name Class Code Classification Title		Current Rate	Range Minimum	Range Maximum	Effective Date
2408	Park, Angela M.	759	Chief Clerk	\$ 11.54	\$ 11.89	\$ 22.09	01-Jul-07
2401	Kosur, Heather M.	4901	Library Assistant	\$ 11.54	\$ 11.89	\$ 21.78	01-Jul-07
420	Kabungame, Sherry L.	24	Food Sanitation Laborer	\$ 10.12	\$ 10.42	\$ 15.39	01-Jul-07
1993	Mirch, Teresa M.	846	Office Support Associate	\$ 9.76	\$ 10.05	\$ 17.91	01-Jul-07
4	Call, Jill D.	58	Administrative Aide	\$ 5,012.00	\$ 2,639.00	\$ 5,003.00	01-Jul-07
180	Hammons, Janice K.	58	Administrative Aide	\$ 5,043.00	\$ 2,639.00	\$ 5,003.00	01-Jul-07
465	Meadors, Russell T.	185	Broadcasting Program Assistant	\$ 2,339.00	\$ 1,964.00	\$ 2,259.00	01-Oct-06
1521	Davenport, Janet L.	747	Administrative Clerk	\$ 4,337.00	\$ 2,182.00	\$ 4,299.00	01-Jul-07
1922	Rust, Kari B.	965	Costumer	\$ 3,197.00	\$ 1,994.00	\$ 3,190.00	01-Jul-07
460	Mangina, Gary A.	1035	Deputy Director	\$ 7,418.00	\$ 4,425.00	\$ 7,082.00	01-Jul-07
462	Ryburn, Benjamin T.	1119	Assistant Director Of Physical Plant	\$ 8,174.00	\$ 4,935.00	\$ 7,896.00	01-Jul-07
626	Lebovitz, Marc	1122	Coordinator Of Public Information	\$ 6,474.00	\$ 3,222.00	\$ 6,410.00	01-Jul-07
2820	Stowers, Cathy R.	1164	Police Telecommunicator	\$ 16.74	\$ 11.82	\$ 16.58	01-Jul-06
672	Wheatley, Lewis A.	1391	Network Engineer V	\$ 7,232.00	\$ 4,425.00	\$ 7,169.00	01-Jul-07
2800	Coyne, Richard L.	1795	Refrigeration Mechanic Foreman	\$ 38.98	\$ 36.83	\$ 36.83	01-May-06
2807	Strawser, Robert W.	1828	Pipefitter Foreman	\$ 38.98	\$ 36.83	\$ 36.83	01-May-06
2711	McClure, Randy B.	2160	Building Inspector	\$ 26.88	\$ 24.88	\$ 24.88	01-May-06
718	Radka, Tami L.	2375	Business Manager I	\$ 5,008.00	\$ 2,912.00	\$ 4,958.00	01-Jul-07
2672	Van-Ostrand, Robert W.	2632	Refrigeration Mechanic	\$ 36.10	\$ 34.10	\$ 34.10	01-May-06
2804	Berchtold, Ricki O.	2632	Refrigeration Mechanic	\$ 36.10	\$ 34.10	\$ 34.10	01-May-06
3274	Maquet, David L.	2632	Refrigeration Mechanic	\$ 36.10	\$ 34.10	\$ 34.10	01-May-06

Appendix A

Employees Paid Outside of Approved Salary Ranges

Position Number	Employee's Name	Class Code	Classification Title	Current Rate	Range Minimum	Range Maximum	Effective Date
3276	Clark, David A.	2632	Refrigeration Mechanic	\$ 36.10	\$ 34.10	\$ 34.10	01-May-06
3012	Summers, Charles E.	3081	Police Sergeant	\$ 30.11	\$ 27.66	\$ 29.66	01-Jul-06
2832	Ronnfeldt, Derek K.	3081	Police Sergeant	\$ 30.68	\$ 27.66	\$ 29.66	01-Jul-06
2818	DeVore, Bonnie C.	3081	Police Sergeant	\$ 31.16	\$ 27.66	\$ 29.66	01-Jul-06
1895	Thacker, Jr., Carl V.	3558	Musical Instrument Technician III	\$ 4,445.00	\$ 2,639.00	\$ 4,412.00	01-Jul-07
318	Moraleda, Patrick H.	3570	Pharmacist Supervisor	\$ 8,954.00	\$ 3,970.00	\$ 8,215.00	01-Jul-07
1921	Mays, Dennis R.	3981	Instructional Materials Technician II	\$ 3,855.00	\$ 2,331.00	\$ 3,729.00	01-Jul-05
3831	Camp, Stanley E.	4220	Senior Machinist Welder	\$ 36.10	\$ 34.10	\$ 34.10	01-May-06
24	Papuga, Richard W.	4566	Internal Auditor V	\$ 7,436.00	\$ 4,425.00	\$ 7,082.00	01-Jul-07
2841	Burns, Robert F.	4689	Parking Services Agent II	\$ 12.33	\$ 11.30	\$ 11.94	01-Jul-06
3680	Loscar, Adam E.	4689	Parking Services Agent II	\$ 12.33	\$ 11.30	\$ 11.94	01-Jul-06
2356	Rich, Ann E.	4900	Library Clerk	\$ 15.80	\$ 8.74	\$ 14.89	01-Oct-05
2377	McCannon, Betty J.	4903	Library Senior Specialist	\$ 25.98	\$ 11.20	\$ 23.43	01-Oct-05
36	Bahnsen, Jo E.	5000	Accounting Associate	\$ 8,270.00	\$ 3,524.00	\$ 8,029.00	01-Jul-06
21	Queen, Ronda	5010	Business/Administrative Associate	\$ 6,038.00	\$ 2,870.00	\$ 5,690.00	01-Jul-06
114	Jenson, Julie B.	5020	Human Resource Associate	\$ 6,861.00	\$ 3,175.00	\$ 6,661.00	01-Jul-06
19	Beach, Pamela J.	5030	IT Manager/Admin Coordinator	\$ 8,700.00	\$ 3,778.00	\$ 8,510.00	01-Oct-04

Appendix B

Extra Help Appointments Exceeding the 900-Hour Rule

Employee Name	Position Number	Empl Department	Beginning Pay Period Date	Ending Pay Period Date	Total Hrs. for Person	
Apple, Joyce A.	31777	Comptroller's Office	6/30/07	1/31/08	901.00	
Bradley, Kai T.	adley, Kai T. 31273 University High School		9/30/06	6/15/07	1181.25	
Ganieany, James M.	Ganieany, James M. 31445 University Housing Se		3/31/07	9/30/07	990.03	
Johnson, Jennifer	Unknown	Office of Disability Concerns	3/31/07	Unknown	218.50	
			9/15/07	12/15/07	1048.00	
			2/29/08	Únknown	81.00	
					1347.50	
Kissel-Wilkinson, Karen J.	31184	Registrar	10/15/06	5/31/07	900.50	
Love, Sharon L.	31217	Special Education	11/15/06	4/30/08	1314.50	
Marshall, Andrea E.	31375	Superintendence	1/31/07	10/15/07	1107.60	
Morris, Tanner J.	Unknown	University High School	4/30/07	4/30/08	903.70	
Norfleet, Belinda	31246	Janitorial	10/15/06	5/15/07	903.50	
Okanu, Ejike 31355 Universit		University Housing Services	1/31/07	8/31/07	1075.00	
Wills, Ranella	32452	Development-Fundraising	8/31/06	12/15/07	986.50	

Appendix C

Position Number	Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hrs.
31136	Childs, Channelle C.	8/31/06	12/15/06	Janitorial	525.50
		1/31/07	5/31/07		650.00
		7/31/07	8/15/07		79.30
					1254.80
31184	Kissel-Wilkinson, Karen J.	10/15/06	5/31/07	Registrar	900.50
		7/31/07	2/29/08	74	900.00
					1800.50
31215	Goodman, James E., Sr.	8/31/06	5/15/07	Parking & Transportation	498.35
		6/30/07	4/30/08		664.50
					1162.85
31224	Diaz, Graciela	10/15/06	4/15/07	Janitorial	898.00
		5/31/07	11/15/07		900.00
		1/31/08	4/30/08		539.00
					2337.00
31226	Lanham, Mary L.	10/15/06	4/15/07	Janitorial	884.00
		5/31/07	9/30/07		618.12
		11/15/07	12/15/07		202.50
					1704.62
31228	Brown, Steven R., Jr.	10/15/06	4/30/07	Janitorial	899.50
		7/31/07			2.00
					901.50

Appendix C

Position Number	Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hrs. for Position
31230	Almanza, Miguelina	10/15/06	4/15/07	Janitorial	878.60
		5/31/07	11/15/07		894.50
		1/31/08	4/30/08		562.10
					2335.20
31246	Norfleet, Belinda	10/15/06	5/15/07	Janitorial	903.50
		8/31/07	9/30/07		219.00
					1122.50
31269	Gbabu, Delphin	10/31/06	4/30/07	Janitorial	892.50
		7/15/07	12/15/07		712.50
					1605.00
31290	Johnson, Jerry	11/15/06	5/31/07	Janitorial	900.00
		7/15/07	12/15/07		830.50
					1730.50
31292	Brinkman, Todd A.	11/30/06	4/30/07	University Recycling	787.50
		6/15/07	11/30/07		835.50
		1/15/08	4/30/08		577.50
					2200.50
31300	Junghanel, Allen L.	11/15/06	5/15/07	Janitorial	892.50
		6/30/07	9/30/07		540.00
					1432.50

Appendix C

Position Number	Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hrs.
31302	Person, Melvin L.	11/30/06	5/31/07	Janitorial	865.70
		7/15/07	12/15/07		815.90
					1681.60
31375	Marshall, Andrea E.	1/31/07	6/30/07	Superintendence	732.60
		1/31/07	10/15/07		1107.60
		8/15/07	10/15/07		375.00
					2215.20
31458	Cooley, Gregory D.	3/15/07	9/30/07	Superintendence	896.18
		1/31/08	4/30/08		206.60
					1102.78
31496	Laub, Barbara L.	8/31/06	2/28/07	Comptroller's Office	408.00
		4/15/07	3/31/08		690.00
					1098.00
31511	Hill, Preston J.	3/31/07	11/15/07	Golf Course	819.00
		4/15/08	4/30/08		127.50
					946.50
31514	Puente, Gilberto	8/31/06	9/30/06	Parking & Transportation	126.50
		11/15/06	6/15/07		795.75
		7/31/07	12/15/07		756.75
		1/31/08	4/30/08		487.75
					2166.75

Appendix C

Position Number	Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hrs.
31518	Bekope-Beyelo, Mputu	3/31/07	8/15/07	Janitorial	720.00
		10/15/07	12/15/07		322.50
					1042.50
31536	Cordero, Manuel	8/31/06	11/30/06	Bone Student Center	434.00
		1/15/07	5/31/07		691.00
		7/15/07	12/15/07		805.50
		1/31/08	4/30/08		533.00
					2463.50
31588	Morton, John W.	8/15/07	1/31/08	University Recycling	762.50
		3/15/08	4/30/08		315.00
					1077.50
31621	Molck, Erin M.	5/15/07	11/30/07	Registrar	900.00
		1/15/08	4/30/08		556.51
					1456.51
31645	Wasilewski, Cory A.	5/31/07	1/31/08	Superintendence	630.77
		5/31/07	2/15/08	University Housing Services	669.44
					1300.21
31786	George, David G.	9/15/07	12/15/07	School of Theatre	451.00
		1/31/08	4/30/08		460.00
					911.00

Appendix C

Position Number	Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hrs. for Position
31858	Askeland, Tristan J.	8/31/06	1/15/07	University Housing Services	476.08
		2/28/07	8/31/07		895.10
					1371.18
31865	Croff, William R.	8/31/06	11/15/06	Golf Course	247.50
a, scenn constitutivise		4/30/07	10/31/07		677.00
					924.50
32452	Wills, Ranella	8/31/06	12/15/07	Development-Fundraising	986.50
		1/31/08	4/30/08		469.50
					1456.00
31025	Multiple Incumbents			John Green Bakery	1631.24
31257	Multiple Incumbents			Various	3422.88
31463	Multiple Incumbents			Superintendence	1381.56
31680	Multiple Incumbents			Public Service	2533.54
31877	Multiple Incumbents			Various	4935.60
31878	Multiple Incumbents			Various	3731.66
31883	Multiple Incumbents			Various	2348.09
31916	Multiple Incumbents			Various	14547.41

Appendix D

Extra Help Employees Paid Beyond Limitations and Available Hours

Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hours
Ames, Shana M.	8/31/06	12/15/06	Office of Disability Concerns	2698.00
	1/31/07	5/15/07	316	2771.50
	8/31/07	4/30/08	"	5668.00
Ellison, Rene L.	8/31/06	12/15/06	Dean of Students	2866.50
	1/31/07	5/15/07	"	3004.00
	8/31/07	12/15/07	"	2991.25
	1/31/08	4/30/08	п	2596.25
Feree, Alicia C.	4/30/07		Office of Disability Concerns	499.75
	8/31/07	12/15/07	и	2990.75
Habegger, Cali R.	8/31/06	12/15/06	Dean of Students	4287.51
	1/31/07	5/15/07	9110	4462.00
	6/15/07	12/15/07		4789.04
	1/31/08	3/15/08		2437.00
	3/31/08	4/30/08	u u	2078.00
	1/31/07	12/15/07	Office of Disability Concerns	9251.04
	1/31/08	4/30/08	u	4515.00
Holley, Beverly J.	8/31/07	12/15/07	Dean of Students	2570.00
	1/31/08	4/30/08	"	2153.50
	8/31/06	12/15/06	Disability Concerns Accom	2229.50
	1/31/07	5/15/07	n .	4582.00
Morge, Mia A.	8/31/06	11/30/07	Office of Disability Concerns	9301.52

Appendix D

Extra Help Employees Paid Beyond Limitations and Available Hours

Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hours
Olejnik, Heidi S.	8/31/07	12/15/07	Office of Disability Concerns	4382.00
Poindexter, Lynne M.	8/31/07	4/30/08	Office of Disability Concerns	4198.00
Smith, Anna J.	8/31/06	12/31/06	Office of Disability Concerns	3279.50
	2/15/07	5/15/07	TH)	2983.50
	8/31/07	12/15/07	Ü	3198.75
	1/31/08	4/15/08	3113	1455.00
Telander, Susan L.	8/31/06	11/30/06	Office of Disability Concerns	1753.50
	1/31/07	5/15/07	"	1102.50
	9/15/07	12/15/07	TI .	1655.25
Trueblood, Linda M.	8/31/06	12/15/06	Office of Disability Concerns	1055.50
	5/15/07	6/30/07	"	948.50
	8/31/07	12/15/07	"	993.00
	1/31/08	4/30/08	u	860.00
Vespa, Shanna L.	8/31/07	12/15/07	Office of Disability Concerns	5039.00
	1/31/08	4/30/08	n .	3644.00
Waltz, Katherine C.	8/31/06	12/15/06	Office of Rehab Services	2882.50
	1/31/07	6/15/07	"	4583.50
	8/31/07	12/15/07	n'	4524.50
	1/31/08	4/30/08	"	3227.75

Appendix D

Extra Help Employees Paid Beyond Limitations and Available Hours

Employee Name	Beginning Pay Period Date	Ending Pay Period Date	Department	Total Hours
Wiegand, Janel E.	8/31/06	6/15/07	Office of Disability Concerns	1706.00
	7/31/07	12/15/07	in.	2850.51
	1/31/08	4/30/08	**	2642.50
Zeitler, Brenda L.	8/31/06	12/15/06	Office of Disability Concerns	3970.00
	1/31/07	5/15/07	XII.	3077.50
	8/31/07	12/15/07	n	2634.00
	1/31/08	4/30/08	"	2546.50