

STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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September 2, 2008

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The State Universities Civil Service System respectfully submits the Final Audit Report of the Biennial Institutional Compliance Audit conducted at Western Illinois University. The audit period tested was July 1, 2005 through October 31, 2007. 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 (217) 278-3150 ext. 236.

Lewis T. (Tom) Morelock
Executive Director

Western Illinois University Final Audit Report



State Universities Civil Service System Compliance Audit

September 2, 2008

Audit Period

July 1, 2005 to October 31, 2007

Prepared by:

Jeff Brownfield
Assistant Director

Western Illinois University
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Appendix A: *Review of Exempted (PAA) Positions*

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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 purposes 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\(c\)](#)). The Act and Code are hereinafter referred to as the Statute and Rules.

This report communicates the final outcome of a comprehensive human resource operational audit, which included an on-site evaluation that was conducted from February 19-22, 2008. An exit conference conducted July 22, 2008 provided the opportunity for the Draft Audit Report to be discussed with the Employer. Upon completion of the exit conference, the draft report was revised and mailed to Pam Bowman on July 25, 2008. This Final Report reflects the audit Findings and an Institutional Corrective Action Plan which was submitted by the Employer.

OVERVIEW

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

- **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.

- **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
Roger Frick, Human Resource Officer
Paula Mitchell, Human Resource Assistant

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September 2, 2008

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 Procedure Manuals](#), applicable University/agency policies/procedures, and auditing standards.

SUMMARY OF MATERIAL FINDINGS

<u>Number of</u>	<u>This Report</u>
Findings	2
Repeated findings®	2®

SCHEDULE OF MATERIAL FINDINGS

<u>Item Number</u>	<u>Page</u>	<u>Description</u>
WIU FY08-1	4	FINDINGS (STATE UNIVERSITIES CIVIL SERVICE ACT) Exemption Authorization Applied to Positions that match Civil Service Classification Specifications
WIU FY08-2	6	FINDINGS (ILLINOIS ADMINISTRATIVE RULES) Non-compliance with Extra Help Employment and Position Limitations

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**Material Findings, Recommendations, Institutions Corrective Action Plans
and Additional Auditor Comments**

WIU FY8-01 Exemption Authorization Applied to Positions that match Civil Service Classification Specifications

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

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 Appointment 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."

A review of approximately fifty (50) position descriptions, including approximately ten (10) on-site interviews of various exempted employees, discovered that four (4) of the exempt positions were performing duties matching the specifications for various Civil Service classifications. These positions are listed in Appendix A.

According to the University, 'standard' titles approved for use by the System Office were applied to the majority of the exempted positions. In addition, the University indicated that due to staff turnover there were some position descriptions that needed to be reviewed and updated to meet the triennial review standards.

A failure to establish appropriate classification plan management protocols that properly update, analyze and evaluate position descriptions leads to unauthorized exemption authorizations, utilization of inappropriate employment protocols, and non-compliance with Act, Code and

Procedures. Consequently, positions are improperly identified and appropriate Civil Service protocols circumvented, significantly increasing the possibility of employment issues.

This was a repeat finding from the previous audit conducted October 11-14, 2005. [*Finding Code FY06, pages 17-19*]

In accordance with the statutory intent and basic premise contained in [Section 36\(e\)](#) 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 exemptions through the [Standard Titles](#).

We recommend that the University establish a timeline to complete an in-depth review of the position descriptions for the four (4) positions identified in Appendix A 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 Agency to the SUCSS [Principal Administrative Appointments Procedures Manual, Section 1.8, Changing a Principal Administrative Appointment \(PAA to a Civil Service Position\)](#), for guidance should the Agency decide to move any of these positions immediately.

The University may also assign the Pilot Program classification designations, when appropriate, to the four (4) positions to be reviewed. These [Pilot Program](#) classifications utilize more flexible employment protocols and would offer a more transparent transition.

Institutional Corrective Action Plan—provided by Pam Bowman, Director of Human Resources

The suggested civil service classifications do not meet the department's need or the University's classification structure at this time.

The University reviews job descriptions triennially and upon vacancy. If upon review these positions meet the specifications of the civil service classifications as suggested, the University will transition these positions upon vacancy.

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WIU FY08-02 Non-compliance with Extra Help Employment and Position Limitations

- 1) [Illinois Administrative Code \(Code\), Section 250.70\(g\) Extra Help Appointments](#)
- 2) [Employment and Separation Procedures Manual, Section 2.10 Nonstatus Appointment](#)

Guidelines for Extra Help positions and Extra Help employees are contained in the Administrative Rules. "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 have 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 Rule is that they "... 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.

The Auditor tested approximately 446 Extra Help appointments for compliance and determined that 20 positions were outside of established guidelines and exceeded the 900 hour limitation, [Section 250.70\(g\)](#) of the Code.

The University utilizes extra help to fill in for employees on medical leaves, workers' compensation leave, for project work, for temporary departmental needs, and to provide coverage until a status position is approved. Many of these situations last much longer than what the 900 hours can cover.

Current University position management practices in this respect make it difficult to determine whether or not an Extra Help position has exceeded employment limitations and should be terminated. Positions and employees are utilized longer than allowed, impacting the overall employment relationship, which is inconsistent with Statute and Rules.

This was a repeat finding from the previous audit conducted October 11-14, 2005. *[Finding Code FY06, page 31]*

We recommend that the University identify and implement additional position management protocols that will adequately monitor and regulate Extra Help positions and Extra Help employees in accordance with [Section 250.70\(g\)](#) of the Code. To possibly reduce the frequency of these findings, the University may be able to utilize [Extra Help Extensions](#), when applicable.

It is also noted that in some instances the position was converted to a status appointment and/or the employee who occupied the position obtained a status position.

Institutional Corrective Action Plan—provided by Pam Bowman, Director of Human Resources

While some Extra Help Appointments have worked beyond 900 hours, the appointments accommodated employees on military leave, medical leave, and/or assisted the University in meeting its operational needs.

However, as noted in the previous SUCSS audit, the University will review internal procedures for managing Extra Help Appointments taking operational needs into consideration. Additionally, the University will explore the feasibility of requesting extensions for certain extra help positions which appear to meet the standards recently established by SUCSS.

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Appendix A

Review of Exempted (PAA) Positions (Statute 36(e), Rule 250.30(a))

	Position Reviewed	Number	Suggested Civil Service Classification
¹	Educational Technology Specialist	50172	Instructional Communication Technical Operator Series / Instructional Media Systems Series
²	Assistant to the Dean College of Education	50179	Administrative Assistant
³	Microsoft Server Desktop and Security Specialist	50342	Applications Programmer Series / IT Technical Associate
⁴	Technology Security Specialist	50351	Applications Programmer Series / IT Technical Associate