

STATE UNIVERSITIES CIVIL SERVICE SYSTEM

*Sunnycrest Center
1717 Philo Road, Suite 24
Urbana, Illinois 61802-6099*



*James D. Montgomery
Merit Board Chair
Jeff Brownfield
Executive Director*

March 17, 2017

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Southern Illinois University

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Director of Human Resources
Designated Employer Representative
Southern Illinois University Carbondale

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Executive Director of Audits
Southern Illinois University Carbondale

Mr. James D. Montgomery
Merit Board Chair
State Universities Civil Service System

Dr. Donna Manering
Merit Board Member
State Universities Civil Service System

The State Universities Civil Service System respectfully submits the Governance, Risk, and Compliance Audit of the Office of Human Resources at Southern Illinois University Carbondale, covering the period of October 1, 2013 through June 30, 2016. This report is intended to communicate positive human resource practices observed, as well as document the risk assessment category findings, and provide recommendations to rectify issues formulated through a comprehensive human resource compliance and operational audit.

On behalf of the Legal and Compliance Services Division, we thank Southern Illinois University Carbondale and their 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 David L. DeThorne, Legal and Compliance Services Manager and Legal Counsel or Lucinda M. Neitzel, Assistant Director of Legal and Compliance Services at (217) 278-3150.

A handwritten signature in black ink, appearing to read "Jeff Brownfield".

Jeff Brownfield
Executive Director

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March 17, 2017

Ms. Jennifer Watson
Director of Human Resources
Designated Employer Representative (DER)
Southern Illinois University Carbondale
Carbondale, IL 62901-6520

Dear Jennifer:

As you are aware, the State Universities Civil Service System was created 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 University System Office is charged with establishing "a sound program of personnel administration for its constituent employers (110 ILCS 70/36b(2))".

As part of this statutory authority, 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 purpose and intent of the Governance, Risk, and Compliance (GRC) Audit program is to assist Employers in complying with these governing regulations.

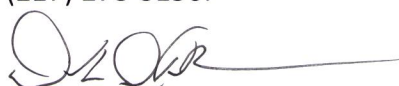
This communication serves to formally outline these regulatory requirements and to further demonstrate our commitment to transparency with respect to the FY2017 Governance, Risk, and Compliance Audit for Southern Illinois University Carbondale. Prior to the on-site visit, your office was provided with the Audit Charter, approved by the Merit Board on August 17, 2016, as well as a detailed audit scope statement and associated risk assessment evaluation for each area or program being evaluated.

The Legal and Compliance Services Division is the unit responsible for enforcing and making determinations as to whether an existing personnel program is consistent with governing regulations and procedural standards. However, in conjunction with that requirement, it is our goal to assist Employers in meeting the needs and expectations of administrators and civil service employees alike, identify problems and propose solutions, and provide staff assistance

and guidance where needed. We believe that a collaborative approach through open communication provides the necessary avenue to which compliance is best achieved.

The following report communicates the final outcome of the Governance, Risk, and Compliance Audit, which included an extensive evaluation of data outcomes, questionnaires, and an on-site evaluation conducted September 28-30, 2016. A formal Exit Conference was offered to the Employer to discuss the specific findings contained in the Draft Audit Report, however, the offer was declined. The Employer stated their understanding of the report and its contents and submitted their formal administrative response, which is contained in this report.

If there are any questions with respect to this report or its contents, please contact our office at (217) 278-3150.

A handwritten signature in dark ink, appearing to read 'D. DeThorne', with a long horizontal flourish extending to the right.

David L. DeThorne

Legal Services Manager and Legal Counsel

STATE UNIVERSITIES CIVIL SERVICE SYSTEM



Governance, Risk and Compliance Audit Report (Final)

March 17, 2017

SOUTHERN ILLINOIS UNIVERSITY CARBONDALE

Audit Time Frame:
October 1, 2013 – June 30, 2016

On-Site Visit:
September 28 – 30, 2016

Prepared by:

Lucinda M. Neitzel

Assistant Director, Legal and Compliance Services

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

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State Universities Civil Service System
Legal and Compliance Services
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Overview of Specific Areas Subject to Review

Prior to selecting the audit criteria for any Employer, the following Human Resource topic areas were reviewed when identifying the Audit Objective and Scope, Risk Assessment Categories, and Findings identified in this report:

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 position audit process and corresponding determinations.

Compensation Programs

The Auditor completes an analysis of the Employer's use of pay rates and pay ranges, as 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, security, and register management.

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 Positions Exempt from Civil Service Guidelines

The Auditor completes a review of the employment protocols and assigned responsibilities for Principal Administrative Appointments. This review is conducted to assure compliance with recognized exemption authorization procedures. The Employer's exemption forms and related position descriptions are reviewed and selected incumbent interviews are conducted for validation of approved exemptions. 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 topics.

Audit Objective and Scope

Objective: As stated in the Governance, Risk, and Compliance Audit Charter for the State Universities Civil Service System, and approved by the Merit Board on August 17, 2016, the primary objective and purpose of the audit program is 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 FY2017 Audit Cycle for Southern Illinois University Carbondale included a comprehensive evaluation of employment designations and/or category of status, non-status, and exempt appointments, register maintenance, compliance with the 900-hour limitation with respect to Extra Help Appointments, time frame requirements for Temporary Upgrade Assignments, an update regarding previously cited audit findings, and personnel file reviews.

Risk Assessment Categories

Topics of Specific Focus by Risk Assessment Category: Prior to 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/or 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

While subject to change, audit findings are typically issued and defined 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 FY2017 Governance, Risk, and Compliance Audit at Southern Illinois University Carbondale, the following risk assessments and areas of focus were communicated to the Employer prior to 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, 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 in the Act, Code, and System Procedures.

While not a definitive conclusion, documented findings depend on the severity of the issue and whether it is related to a violation of the Act, Code, or Procedure.

Southern Illinois University Carbondale
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Executive Summary
YEAR ENDED—FY2017

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

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

REPORT SCHEDULE OF POSITIVE OBSERVATIONS AND AUDIT FINDINGS

<u>Item</u>	<u>Page</u>	<u>Description</u>
		<u>POSITIVE OBSERVATIONS</u>
SIUC FY17-01	5	Effective Maintenance of Specialization Certification Records
SIUC FY17-02	8	Effective Maintenance of Historical Civil Service Position Control Records
		<u>RISK ASSESSMENT CATEGORY 1 FINDINGS</u>
SIUC FY17-03	10	Exemption Authorization Applied to Positions that Correspond to Civil Service Classification Specifications®
SIUC FY17-04	17	Non-Compliance with Extra Help Employment and Position Limitations®
SIUC FY17-05	22	Extended Utilization of Temporary Upgrade Assignments

Southern Illinois University Carbondale
Final Audit Report

Positive Observation and Auditor Comments

SIUC FY17-01	EFFECTIVE MAINTENANCE OF SPECIALIZATION CERTIFICATION (SPECIALTY FACTOR) RECORDS
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CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), 70/36d., Powers and Duties of the Merit Board*
- 2) *Illinois Administrative Code (Code), Section 250.30 Class Specifications*
- 3) *Classification Plan Management Procedures Manual, Section 2.1 Employer Responsibilities*
- 4) *Classification Plan Management Procedures Manual, Section 4.1 - 4.5, Specialized Positions*
- 5) *Classification Plan Management Procedures Manual, Section 5.1 Position Control, Definition*

According to the State Universities Civil Service Act, “the Merit Board shall have power to delegate to its Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.” The Illinois Administrative Code (Code), Section 250.30(b)(1) Class Specifications, provides that “The System shall maintain written specifications, as approved by the Merit Board, for each class in the classification plan. Such specifications shall include the class title, function of position, characteristic duties and responsibilities, minimum acceptable qualifications, including any special licenses or certificates required by state or federal laws, and additional desirable qualifications.”

The Classification Plan Management Procedures Manual states that “for the majority of positions classified in the University System, the Minimum Acceptable Qualifications (MAQs), as specified in the class specifications, are appropriate for testing, referral, and certification purposes. However, the duties and responsibilities associated with some positions are such that incumbents, or candidates for vacancies in these positions, must necessarily possess certain other job-related qualifications *in addition to, or more specific than*, those defined in the class specification. Without these necessary additional qualifications, or requirements, incumbents or candidates for these vacant positions could not be expected to satisfactorily perform in the position. The specific additional qualification(s) required for such positions are called ***specialty factor(s)***.”

In certain instances, and in accordance with other defined employment protocols, employers are specifically empowered to assign specialty factors to positions within designated custom

classifications. Formal authorization from the University System Office is not required in these particular instances. Consequently, those specialty factor designations authorized by the Employer are subject to audit review. Employers are not required to secure formal authorization to assign specialty factors to positions in the following classifications:

Accounting Associate
Human Resource Associate
Business/Administrative Associate
Information Technology Technical Associate
Information Technology Support Associate
Program/Student Advisor
Grants and Contracts Associate
Information Technology Manager/Administrative Coordinator

CONDITIONS/FACTS:

During the on-site portion of the audit, the Auditor selected a random sampling of eight (8) Civil Service position control records to determine whether appropriate specialty factor documentation was properly tracked and maintained. Based on this review, it was observed that very detailed position history information was contained, as well as the position's associated specialty factor, in an electronic position control database format that was easily retrievable upon request. The following position control records were inspected pursuant to the criteria/standards previously noted:

Information Technology Support Associate (N7594)
Information Technology Technical Associate (N10207.002)
Information Technology/Administrative Coordinator (N10629)
Administrative Aide (N5146)
Nurse Practitioner (N10540)
Tree Surgeon (N10545)
Grill Cook (N10474)
Program Coordinator (N10341)

As a matter of information and follow up from the on-site audit visit, the Employer submitted a listing of positions with specialty factors previously assigned and approved by the University System Office that are no longer required. The following positions have been updated to reflect and appropriately remove assigned specialty factors pursuant to the Employer's request:

Driver (N9659 and N1764)
Nurse Practitioner (N10540)
Speech Pathologist (N10591)
Communications Technician III (N10682)
Communications Technician III (N10683)
Child Care Assistant (N9375)

Clerical Assistant (N8809)
Child Development Associate (N9162)

AUDITOR COMMENTS:

The Auditor commends the Human Resource Office staff for their excellent maintenance of electronic records with respect to maintaining specialty factor information within their position control process. Documents contained in the records sampling were quickly and easily retrievable, exceptionally well maintained, and included all pertinent information related to job content/descriptions and specialty factor designations, especially related to custom classifications. These recordkeeping efficiencies provided the Auditor and Employer with significant time savings while performing the on-site audit visit.

Southern Illinois University Carbondale
Final Audit Report

Positive Observation and Auditor Comments

SIUC FY17-02	EFFECTIVE MAINTENANCE OF HISTORICAL CIVIL SERVICE POSITION CONTROL RECORDS
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CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), 70/36d., Powers and Duties of the Merit Board*
- 2) *Illinois Administrative Code (Code), Section 250.30 Class Specifications*
- 3) *Classification Plan Management Procedures Manual, Section 2.1 Employer Responsibilities*
- 4) *Classification Plan Management Procedures Manual, Section 5.1 Position Control, Definition*
- 5) *Classification Plan Management Procedures Manual, Section 5.2 Position Control, Position Identification*

According to the State Universities Civil Service Act, “the Merit Board shall have power to delegate to its Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.” The Illinois Administrative Code (Code), Section 250.30(b)(1) Class Specifications, provides that “The System shall maintain written specifications, as approved by the Merit Board, for each class in the classification plan. Such specifications shall include the class title, function of position, characteristic duties and responsibilities, minimum acceptable qualifications, including any special licenses or certificates required by state or federal laws, and additional desirable qualifications.”

The Classification Plan Management Procedures Manual, Section 5.1 states that “Civil Service position control is a management tool concerned with the continuing record of the histories of positions. The focal point with respect to position control and what drives the class plan is the historically detailed actions regarding positions.” In addition, Section 5.2 states that “position control numbers are based on the position, and not on the incumbent holding that position or to any budget line item. Position numbers, assigned by the Employer on a continuing numerical basis as needed, remain with the individual position until canceled. The reclassification, reallocation, or administrative title change of a position does not affect the civil service position number.”

CONDITIONS/FACTS:

During the on-site portion of the audit, the Auditor selected a random sampling of eight (8) Civil Service position control records to determine whether appropriate specialty factor

documentation was properly tracked and maintained. As part of this review, an overall spot-check assessment of the Employer's position control records was conducted. Based on this review, it was observed that very detailed position history information was contained in an electronic position control database format that was easily retrievable upon request. The following position control records were inspected pursuant to the criteria/standards previously noted:

Information Technology Support Associate (N7594)
Information Technology Technical Associate (N10207.002)
Information Technology/Administrative Coordinator (N10629)
Administrative Aide (N5146)
Nurse Practitioner (N10540)
Tree Surgeon (N10545)
Grill Cook (N10474)
Program Coordinator (N10341)

AUDITOR COMMENTS:

The Auditor commends the Human Resource Office staff for their excellent maintenance of electronic records with respect to their position control process. Documents contained in the records sampling were quickly and easily retrievable, exceptionally well maintained, and included all pertinent information related to job content/descriptions, desk audit notes/determinations, reclassification and reallocation transactions, and specialty factor designations. These recordkeeping efficiencies provided the Auditor and Employer with significant time savings while performing the on-site audit visit.

Southern Illinois University Carbondale
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation, Administrative Response, and Additional Auditor Comments

SIUC FY17-03	EXEMPTION AUTHORIZATION APPLIED TO POSITIONS THAT CORRESPOND TO CIVIL SERVICE CLASSIFICATION SPECIFICATIONS
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CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36e Coverage*
- 2) *Illinois Administrative Code (Code), Section 250.30(a) Coverage*
- 3) *Exemption Procedures Manual, Section 3.1, Principal Administrative Appointments*

All employees of 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 shall be covered by the University System described in Sections 36b to 36q, inclusive, of this Act, except the following persons:

- (1) The members and officers of the Merit Board and the board of trustees, and the commissioners of the institutions and agencies covered hereunder;
- (2) The presidents and vice-presidents of each educational institution;
- (3) Other principal administrative employees of each institution and agency as determined by the Merit Board;
- (4) The teaching, research and extension faculties of each institution and agency;
- (5) Students employed under rules prescribed by the Merit Board, without examination or certification.

Exemptions are authorized in accordance with current procedures, requiring verification of exemption authorization through the comprehensive development and ongoing review of accurate position descriptions when standard titles are used. Accordingly, a periodic review and update of position descriptions are required to confirm that positions originally exempted from Civil Service designations continue remain valid. Periodic job description reviews, updated procedures, and ongoing classification plan changes may indicate that a position originally

identified as a Principal Administrative Appointment (PAA) may have been revised or changed, and may now fall within civil service classification plan parameters, requiring a review by the department. Consequently, this may require the department and/or the Human Resource Office to transition a specific position, and any employee currently occupying the position, to an identified and appropriate Civil Service classification.

CONDITIONS/FACTS:

Consistent with the targeted audit sampling method as previously described, the Auditor reviewed sixty (60) position descriptions, including on-site interviews with various exempted employees, and identified twenty-nine (29) positions that appeared to be performing duties responsibilities comparable to those found in Civil Service classifications. As demonstrated in the table below, it should be noted that the majority of these positions directly correspond to Civil Service classification specifications in the Admissions, Communications/Marketing, Program Management, and Information Technology general occupational areas. The basic areas of concern are identified below, with specifics regarding these positions being provided to the Employer under separate cover.

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Principal Administrative Appointments Cited By General Occupational Area</i>		
<i>General Occupation Area</i>	<i>Number of Positions</i>	<i>Civil Service Job Function Comparison</i>
<i>Admissions</i>	<i>5</i>	<i>Admissions Counseling</i>
<i>Communications/Marketing/Recruitment</i>	<i>5</i>	<i>Marketing, Advertising, Recruiting</i>
<i>Data Coordination</i>	<i>1</i>	<i>Institutional Research</i>
<i>Editorial</i>	<i>2</i>	<i>Textual Editing</i>
<i>Special Events</i>	<i>2</i>	<i>Coordinator and Facilitator/Campus Events</i>
<i>Financial Aid</i>	<i>1</i>	<i>Financial Aid Advising</i>
<i>Health Education</i>	<i>1</i>	<i>Coordinator of Health and Wellness</i>
<i>Information Technology</i>	<i>3</i>	<i>IT Support/Technical Associate</i>
<i>Instructional Design</i>	<i>1</i>	<i>Instructional/Faculty Support</i>
<i>Program Coordination/Counseling</i>	<i>4</i>	<i>Coordination of Programs</i>
<i>Project Management</i>	<i>1</i>	<i>Construction Project Coordination</i>
<i>Public Affairs</i>	<i>2</i>	<i>Public and Sports Information</i>
<i>Student Conduct</i>	<i>1</i>	<i>Student Judicial Rights</i>
<i>Total Positions Cited</i>	<i>29</i>	

Notes:

1. The percentage of positions cited during this audit was approximately 50% of the total sample.
2. The salary range of all of the positions cited was \$25,000 - \$63,000 annually; with one (1) Information Technology position compensated at the high end.

The Auditor performed a holistic review of the position description documents for each position sampled, utilizing the following basic analysis process:

- The first component is the comparison between the position description documents and the classification specifications outlined in the Civil Service class plan. This basic principle is most consistent with the Act and Code in this respect, and includes a review of the position's scope and purpose, as well as an analysis of the duties and responsibilities assigned for the work to be performed, in conjunction with those duties contained within the applicable Civil Service classification specifications.
- A secondary component is an evaluation and measurement of several abstract job variables associated with the exemption definition, and referenced through the job duties and responsibilities contained in the position description, such as discretion, autonomy, independent judgment, complexity, etc. These measurements are used to further determine and validate the accuracy of the Employer's initial assessment in exempting a particular position.

CAUSE/SOURCE OF CONDITION:

As previously referenced in this report and according to the Employer's payroll records, 'standard' titles approved for use by the System Office were applied to these positions to form the basis for exemption from Civil Service regulatory guidelines. In addition, there were approximately ten-twelve (10-12) position descriptions that did not appear to be authenticated between the supervisor and incumbent.

EFFECT/IMPACT:

Appropriate classification plan management protocols that properly update Civil Service classification specifications are essential in validating exemption authorizations consistent with regulatory guidelines. In addition, and of equal consequence, is the comprehensive analysis and evaluation of individual position descriptions with respect to adhering to Civil Service regulatory guidelines, in which to prevent the inappropriate identification and designation of positions, inaccurate exemption authorizations, and potential violations of the Act, Code, and Procedures.

FINDING(S) FROM PREVIOUS AUDIT(S) PART A:

During the last three Biennial Compliance Audit cycles, FY2010, FY2012, and FY2014, the Auditor selected a sample of Principal Administrative Appointment (PAA) position descriptions and determined that there were many positions performing matching the specifications for various Civil Service classifications. Further specifics regarding these report findings may be reviewed at the following web link:

<http://www.sucss.illinois.gov/documents/audit/reports/default.aspx?osm=c51>

FINDING(S) FROM PREVIOUS AUDIT(S) PART B:

As part of the previous FY2014 Biennial Compliance Audit, the Auditor reviewed the exempted positions cited during the FY2012 audit to determine if vacancies had in fact occurred since its completion, or if the positions had been accurately flagged and if so, whether the positions had been appropriately analyzed before being exempted again. Based on this review, it was determined that four (4) positions were cited during the FY2012 Biennial Compliance Audit, became vacant, were refilled with new employees, and again exempted during the current FY2014 Biennial Compliance Audit time frame.

The corrective action plan submitted by the Employer during the FY2014 Biennial Compliance Audit indicates that they agreed with the recommendations provided by the Auditor. These recommendations included the transition of re-exempted positions at the next contract renewal date to an appropriate Civil Service appointment. The Employer stated in their administrative response that “previously exempted positions will continue to be monitored by the Employer as updated positions are submitted for review and approval.”

Prior to initiating the current FY2017 Governance, Risk, and Compliance Audit, and as a matter of determining current and future risk assessments regarding previously cited position exemptions, the Auditor informed the Employer that a historical review of audit findings in this topic area would be conducted. Consequently, an analysis of the exempt position payroll document as of the end of the current audit time frame of June 30, 2016 was performed to determine whether the previous FY2014 Biennial Compliance Audit findings related to inappropriate exemptions were adequately addressed and resolved. The Auditor performed with an in-depth review in this respect to assess whether the Employer’s corrective actions were fulfilled in providing a subsequent foundation for future compliance.

In the table below, the Auditor determined that ten (10) specific exempt positions cited during the FY2014 Biennial Compliance Audit became vacant and were exempted again, with the same position number and job title, through the employment of a different incumbent during the current FY2017 Governance, Risk, and Compliance Audit time frame:

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Previously Cited FY2014 Principal Administrative Appointments</i>		
<i>Position Title</i>	<i>Position Number</i>	<i>Civil Service Classification Recommendation</i>
<i>Admissions Coordinator</i>	<i>C.AP.1942.000</i>	<i>Admissions & Records Series or Program/Student Advisor</i>
<i>Coordinator, Hispanic Resource/Service Center</i>	<i>C.AP.114.001</i>	<i>Program Coordinator Series</i>
<i>Director of New Student Programs</i>	<i>C.AP.968.000</i>	<i>Program/Student Advisor</i>
<i>Assistant Director of Corporate Support</i>	<i>C.AP.1117.001</i>	<i>Publicity/Promotion Specialist</i>

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Previously Cited FY2014 Principal Administrative Appointments (Continued)</i>		
<i>Coordinator of Group Sales and Special Events</i>	<i>C.AP.1232.001</i>	<i>Events Administrator Series</i>
<i>Coordinator, First Scholars Program</i>	<i>C.AP.1899.000</i>	<i>Program/Student Advisor or Program Coordinator Series</i>
<i>Coordinator for Wellness Programming (Outreach Programs)</i>	<i>C.AP.621.001</i>	<i>Health Education Coordinator</i>
<i>Distance Education Regional Coordinator (Chicago Region)</i>	<i>C.AP.1982.000</i>	<i>Publicity/Promotion Specialist, Program/Student Advisor, or Program Coordinator Series</i>
<i>Coordinator of Arena Operations</i>	<i>C.AP.1468.000</i>	<i>Athletic Business Manager or Business/Administrative Associate</i>
<i>Assistant Director, Transfer Relations</i>	<i>C.AP.1181.001</i>	<i>Admissions and Records Series or Program/Student Advisor</i>

RECOMMENDATION(S) TO THE EMPLOYER:

The Illinois Administrative Code, Section 250.30(a) provides that the Merit Board has the authority to determine Principal Administrative Appointments (PAA) at each institution or agency. Specifically, it states that “The Director shall publish guidelines for such exemptions, as approved by the Merit Board.” We refer the Employer to these guidelines located in the Exemption Procedures Manual, Section 3.1, Principal Administrative Appointments and Section 4.1, Teaching, Research, and Extension Faculty Appointments, approved by the Merit Board in June 2009. The Designated Employer Representative (DER) of each university and affiliated agency has the responsibility to develop and maintain protocols consistent with the statutory and procedural guidelines related to this important delegated authority. ***The Auditor recommends that the Employer again review these standards, provide an outlined job analysis procedure for review by the System Office, and develop a plan regarding the positions referenced in this finding and review for possible conversion to an appropriate Civil Service classification either immediately or upon vacancy.***

As the System Office has historically emphasized, the cornerstone of position control management lies with the proper administration and maintenance of the position description. With respect to the FY2017 Governance, Risk, and Compliance Audit, it should be noted that while the listed duties and responsibilities contained in the position descriptions were thoroughly documented, some were not properly authenticated between the supervisor and incumbent. ***The Auditor recommends that the Employer enforce and communicate stronger standards to campus departments regarding the proper update and authentication of exempt position descriptions.***

With respect to the ten (10) exempt positions cited during the FY2014 Biennial Compliance Audit that became vacant and were exempted again during the current audit time frame, there

does not appear to be evidence to indicate that these positions were properly analyzed, prior to refilling the position. We again recommend that they be transitioned at the next contract renewal date to an appropriate Civil Service appointment as previously recommended. Additionally, we recommend that the Employer complete an in-depth review of the position descriptions for the positions provided under separate cover to the Employer to further determine if they meet the specifications of the recommended Civil Service classifications. ***The Auditor requests that the Employer provide proper evidence that the positions exempted again were analyzed through a standard job analysis process consistent with the Employer's policies and through assurances given to the Auditor during the previous FY2014 Biennial Compliance Audit.***

*Please be reminded that positions determined to be inappropriately exempted and flagged through the compliance audit process must be reviewed as a matter of standard protocol at the next contract renewal date. 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. It is strongly recommended that positions designated to be transitioned to Civil Service appointments be moved as soon as possible, preferably at the next employment contract renewal date, but certainly no later than at such time that these positions become vacant again. We refer the Employer to the Exemption Procedures Manual, Section 8.2, Changing an Exempt Position to a Civil Service Position for guidance in transitioning these positions to appropriate Civil Service Appointments. ***Again, please note that positions designated for transition through the audit process will be reviewed in the next biennial audit process and must be monitored by the Employer periodically.****

SYSTEM OFFICE ACTIONS:

The majority of the positions cited in this finding can be easily designated and utilized within very flexible Civil Service position classification structures already contained in the professional, semi-professional, technical, and managerial occupational areas. The flexibilities provided within the Custom Classifications include broad banding scoring variables and credential assessment (resume review) examination components; and Specialized Position Certifications (Specialty Factors) are authorized and approved for these positions at the campus Human Resources level, which when defined appropriately for the position to be utilized can actually minimize the time frame for recruitment, selection, and employment of the most qualified candidate to assume the duties and responsibilities of that position.

The System Office has been in the process of reviewing and modernizing current Custom Classification structures, as well as expanding these innovative principles to include many other occupational groups. This will provide additional flexibilities within the Civil Service classification plan and provide Employers with more options, narrow the position designation gap between Civil Service and exempted Principal Administrative Appointments, attempt to reduce the number of position audit citations, and provide overall improvements within our classification plan for system wide utilization. Additionally, with the recent changes to the 'Out of State' residency requirements for professional, semi-professional, and managerial

occupational areas and changes to the interpretation of the 'Rule of Three', many of the previous barriers to Civil Service employment have been virtually eliminated or significantly diminished.

The University System Office will continue in its efforts to provide Employers with current and relevant position classifications for use state-wide. Suggestions from Employers are always welcomed and recommended in order to maintain our Civil Service classification plan, consistent with fulfilling our statutory obligation to establish and provide "a sound program of personnel administration".

ADMINISTRATIVE RESPONSE - PROVIDED BY JENNIFER WATSON, DIRECTOR OF HUMAN RESOURCES:

The employer will work collaboratively with the System Office to develop and implement a more detailed and comprehensive job analysis procedure for exempting positions which will also communicate to campus departments in writing. We also agree that the identified positions from the FY 2014 and FY 2016 Biennial Compliance Audits will be evaluated through this new process and the System Office will be provided the details of those reviews. While the employer accepts the auditor's finding significant concerns in the exemption process, the development and implementation of this more detailed review will be a significant challenge for our office during this time of severe under staffing. The employer will be looking to the System Office to help develop this process.

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Recommendation, Administrative Response, and Additional Auditor Comments

SIUC FY17-04	NON-COMPLIANCE WITH EXTRA HELP EMPLOYMENT AND POSITION LIMITATIONS
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CRITERIA/STANDARDS:

- 1) *Illinois Administrative Code (Code), Section 250.70(f) Extra Help Appointments*
- 2) *Employment and Separation Procedures Manual, Section 2.5 Extra Help Appointments*

Guidelines for Extra Help positions and Extra Help employees 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 that 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 have elapsed from the date of the termination of the position."

For Extra Help employees, the Code requires that "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 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 that 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:

During the FY2017 Governance, Risk, and Compliance Audit, the Auditor reviewed two-thousand, two-hundred twenty-four (2,224) Extra Help employee appointments encompassing two-thousand, four-hundred sixty (2,460) Extra Help positions utilized during the audit time frame. As documented in *Table 1.1* below, **twenty-seven (27) employees** appear to have worked beyond the 900-hour limitation without the required 30-day or 6-month break in service:

Table 1.1

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Extra Help Employees Exceeding the 900-Hour Limitation</i>		
<i>Employee Name</i>	<i>Position Number</i>	<i>Total Number of Hours Worked</i>
██████████	C.CS. EH12774	912.00
██████████	C.CS.EH10691	1,771.50
██████████	C.CS.EH13055	903.00
██████████	C.CS.EH11720	903.75
██████████	C.CS.EH6409 & C.CS.EH8639	1,138.69
██████████	C.CS.EH11733	912.55
██████████	C.CS.EH12618 & C.CS.EH12639	987.76
██████████	C.CS.EH10895	901.50
██████████	C.CS.EH10669	907.50
██████████	C.CS.EH11972	912.50
██████████	C.CS.EH6399 & C.CS.EH8621	1,313.07
██████████	C.CS.EH9879	982.50
██████████	C.CS.EH12158	912.50
██████████	C.CS.EH6275 & C.CS.EH6452	1,642.50
██████████	C.CS.EH6371 – C.CS.EH8622 – C.CS.EH9125	1,803.27
██████████	C.CS.EH11202	937.68
██████████	C.CS.EH10076 – C.CS.EH6892 – C.CS.EH6895	1,829.48
██████████	C.CS.EH13135 & C.CS.EH16008	942.03
██████████	C.CS.EH12215	902.50
██████████	C.CS.EH10992	935.00
██████████	C.CS.EH11773	953.00
██████████	C.CS.EH12210	905.25
██████████	C.CS.EH12542 & C.CS.EH12512	1,651.25
██████████	C.CS.EH6414 & C.CS.EH8623	926.31
██████████	C.CS.EH13272	922.50
██████████	C.CS.EH10114 & C.CS.EH6396	2,314.65
██████████	C.CS.EH13009	922.80

As documented in *Table 1.2* below, **fifteen (15) positions** appear to have been utilized for more than 900 hours of actual work within a 12 month period without a six month lapse:

Table 1.2

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Extra Help Positions Exceeding the 900-Hour Limitation</i>		
<i>Position Number</i>	<i>Employee(s)</i>	<i>Total Number of Hours Worked</i>
C.CS.EH10076		1,164.00
C.CS.EH10759		1,120.00
C.CS.EH10875		940.00
C.CS.EH11715		920.00
C.CS.EH11956		904.00
C.CS.EH12619		1,322.63
C.CS.EH12627		1,704.50
C.CS.EH12650		1,197.20
C.CS.EH13060		931.50
C.CS.EH6275		1,499.00
C.CS.EH6304		962.54
C.CS.EH6399		1,164.83
C.CS.EH6409		1,199.27
C.CS.EH9125		1,284.25
C.CS.EH9154		1,150.56

*****It should be noted that the employing department for the eight (8) employees and seven (7) positions in red were employed via Extra Help in the School of Social Work. The Employer has indicated that monitoring Extra Help employment and hours in this department has been an ongoing problem for years. However, it should be noted that the Employer no longer manages the grant that the School of Social Work utilizes to employ many of these Extra Help employees. Consequently, the Employer does not foresee Extra Help violations in this area in the future.***

CAUSE/SOURCE OF CONDITION:

During both the FY2012 and FY2014 Biennial Compliance Audits, this topic was referenced separately in the Supplemental Audit Report as a Non-Material Finding. As a result of the FY2012 Biennial Compliance Audit, the Employer indicated in their Institutional Corrective Action Plan (ICAP) that an automated tracking system did not exist, however it was believed that the manual system in place, while labor intensive, provided a comprehensive monitoring mechanism and evaluation of the position(s).

Following the FY2014 Biennial Compliance Audit, the Employer indicated in their Institutional Corrective Action Plan (ICAP) that Human Resource staff will continue to work with departments that have long term grants, in finding appropriate permanent civil service

classifications that could be utilized. Further, the Employer indicated that they would continue to explore future enhancements that would allow for an automated system, but until then would continue to work toward a more efficient monitoring process.

Based on the evidence presented during the FY2017 Governance, Risk, and Compliance Audit, it does not appear that adequate protocols to efficiently and effectively monitor Extra Help limitations were properly developed or maintained. Additionally, the Employer indicated that for the purposes of entering hours by data control, the previous appointment's position number was re-utilized. Since this has been observed, the Employer has committed to pursuing a different process of assigning position numbers in order to better monitor this activity, similar to position control methods for permanent positions.

EFFECT/IMPACT:

Employer position management practices related to Extra Help appointments and executed during the audit time frame make it difficult to determine whether or not an Extra Help position, or employee, has exceeded employment limitations and should be terminated. Extra Help positions/people appear to be utilized longer than allowed, impacting the overall employment environment, which is inconsistent with the Code and Employment/Separation Procedures Manual.

FINDING(S) FROM PREVIOUS AUDIT(S):

During the FY2014 Biennial Compliance Audit, the Auditor determined that **twenty (20) employees** appeared to have worked beyond the 900-hour Extra Help limitation without the required 30-day break in service. Additionally, it was determined that **twenty-two (22) positions** were utilized for more than 900 hours of actual work within a 12-month period without a six month lapse.

During the FY2012 Biennial Compliance Audit, the Auditor determined that **five (5) employees** appeared to have worked beyond the 900-hour Extra Help limitation without the required 30-day break in service. Additionally, it was determined that **nineteen (19) Extra Help positions** were utilized for more than 900 hours of actual work within a 12 month period without a six month lapse. Many of the positions frequently had several incumbents employed through them at the same time. Based on a process review, the Auditor acknowledged that significant improvements had been made with respect to position monitoring processes implemented following the issuance of the FY2010 Biennial Compliance Final Audit Report issued on July 14, 2010.

RECOMMENDATION TO EMPLOYER:

The Employer is again reminded that Extra Help appointments are intended to address a need that is 'emergent and casual in nature', and are to be utilized to assist during position vacancies, leaves of absence, and during peak work periods in accordance with established regulatory guidelines and procedures. Compliance with Extra Help appointment and position guidelines must be validated by adequately demonstrating the proper management of this

employment activity, and by adhering to time frame limitations. ***The Auditor recommends that the Employer conduct an operational analysis to determine if there is a need for the creation of additional status appointments to address the long term extensive use of Extra Help appointments and positions in this respect.***

We strongly recommend that the Employer conduct an in-depth internal review of their procedures to identify deficiencies with respect to the Extra Help monitoring process and implement stricter protocols that will adequately monitor and regulate Extra Help positions, and employees assigned to those positions, in accordance with Section 250.70(f) of the Code. While the Human Resource staff continues to work with departments that have long term grants, or in finding appropriate permanent civil service classifications that can be utilized in other areas, ***the Auditor recommends additional enforcement processes from campus administrators should be developed to properly address this topic and alleviate future findings this respect.***

ADMINISTRATIVE RESPONSE - PROVIDED BY JENNIFER WATSON, DIRECTOR OF HUMAN RESOURCES:

We continue to monitor extra help hours closely and will evaluate a different process of assigning position numbers for extra help. However, if we eliminate the School of Social Work employees/positions, SIUC has actually made some progress in reducing our numbers over 900 hours from the 2014 audit review. We see this as an accomplishment given the fact it was done in a time of continually diminishing resources both to HR and the university as a whole. During this difficult time, the university departments look to the EH appointment to bridge the gap until we have more information regarding our budget situation. While we continue to take responsibility, we ask that the System Office develop some type of “term” appointment that will address some of our extra help appointments that have specialized needs.

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SIUC FY17-05 EXTENDED UTILIZATION OF TEMPORARY UPGRADE ASSIGNMENTS

CRITERIA/STANDARDS:

- 1) *Illinois Administrative Code (Code), Section 250.100 Reassignments and Transfers*
- 2) *Employment and Separation Procedures Manual, Section 4.2 Temporary Downgrading and Upgrading Assignments*

According to Section 250.100(b)(3) of the Illinois Administrative Code, "...temporary upgrading and downgrading assignments must not be for more than 30 consecutive work days duration."

The Employment and Separation Procedures Manual, Section 4.2 states, "...upgrading assignments shall be limited to filling vacancies due to absence of incumbents or when it is necessary because of agreements which require a supervisory employee for a special work assignment or project." Further, "Upgrading is not required when the employee performs only certain duties and/or assumes only partial responsibility for the overall duties of the position to which assigned."

CONDITIONS/FACTS:

The Auditor reviewed approximately two-hundred ten (210) employees that were employed in temporary upgrade positions during the current audit time frame. As documented in the table below, ten (10) employees appeared to be temporarily upgraded on a long term and consistent basis:

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Extended Utilization of Temporary Upgrade Assignments</i>		
<i>Employee Name</i>	<i>Upgrade Transaction</i>	<i>Total Number of Days Upgraded</i>
██████████	<i>Carpenter to Carpenter Foreman</i>	<i>597</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>574</i>
██████████	<i>Carpenter to Carpenter Foreman</i>	<i>517</i>

<i>FY2017 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Extended Utilization of Temporary Upgrade Assignments (Continued)</i>		
<i>Employee Name</i>	<i>Upgrade Transaction</i>	<i>Total Number of Days Upgraded</i>
██████████	<i>Electrician to Electrician Foreman</i>	<i>600</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>586</i>
██████████	<i>Carpenter Foreman to Construction Project Coordinator II</i>	<i>575</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>542</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>434</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>427</i>
██████████	<i>Building Service Worker to Building Service Worker Sub-Foreman</i>	<i>389</i>

CAUSE/SOURCE OF CONDITION:

It appears a determination was made by the Employer not to fill these positions with a permanent status employee or through a reclassification action and instead, continued in the overuse of the temporary upgrade provision.

EFFECT/IMPACT:

The foundation of the Merit System and the primary concept of a classification plan management system are that employees be placed in job classifications based on the prominence of actual duties and level of responsibility. The practice of creating a new job assignment through an overextended upgrade is inconsistent with the intent and purpose of the classification plan management system. If a position is upgraded consistently, or is upgraded on a continual basis for an extended period of time, the employee should in effect be reclassified into the classification or a new position posted and filled in the classification.

RECOMMENDATION TO EMPLOYER:

As previously stated, if a position is upgraded on a continual basis for an extended period of time, the employee should in effect be reclassified into the classification or a new position posted and filled in the classification. The intent of the Code was never to allow for these extended periods of performing higher level duties without providing the opportunity of a permanent classification assignment and accruing the appropriate level of seniority in the class. ***The Auditor recommends the discontinuation of temporary upgrades in this fashion and that the employees referenced in this finding be reclassified to the appropriate classification.***

ADMINISTRATIVE RESPONSE - PROVIDED BY JENNIFER WATSON, DIRECTOR OF HUMAN RESOURCES:

While we do not disagree with the evidence, these temporary upgrades were done in observance of the rule. The decisions to use the temporary upgrades over an extended period of time were due to significant fiscal constraints and a desire to avoid bumping when/if the higher level employee returned to work. We agree that this approach has its drawbacks as well and we will put mechanisms in place to cease this practice of extended use of temporary upgrades.