

STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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



*Julie Annette Jones
Merit Board Chair
Jeff Brownfield
Executive Director*

June 2, 2020

Dr. David M. Glassman
President
Eastern Illinois University

Mr. Paul McCann
Interim Vice President of Business Affairs
Eastern Illinois University

Ms. Linda Holloway
Interim Director of Human Resources
Designated Employer Representative
Eastern Illinois University

Ms. Leigh C. Moon
Director of Internal Auditing
Eastern Illinois University

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

Mr. Joseph Dively
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 Eastern Illinois University, covering the period of December 1, 2014 through November 30, 2019. This report is intended to communicate positive human resource practices, document risk assessment category findings, and provide recommendations to rectify issues formulated through this comprehensive human resource compliance and operational audit.

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

Jeff Brownfield
Executive Director

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June 2, 2020

Ms. Linda Holloway
Interim Director of Human Resources
Designated Employer Representative (DER)
Eastern Illinois University
Room 2031 Old Main
600 Lincoln Avenue
Charleston, IL 61920

Dear Linda:

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 and ensure that 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 FY2020 Governance, Risk, and Compliance Audit for Eastern Illinois University. 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 February 10 – 13, 2020. The Auditor provided a Preliminary Observation Report to the Employer and engaged in a post-audit conference on February 17, 2020, which provided specific instructions in rectifying minor concerns. A Draft Audit Report was issued on April 10, 2020, with no formal Exit Conference being requested by the Employer. The Employer stated their understanding of the draft audit report and its contents and submitted their formal administrative response, which is contained herein.

If there are any questions with respect to this report or its contents, please contact our office.

A handwritten signature in black ink that reads "Gail Schiesser / sr". The signature is written in a cursive, flowing style.

Gail Schiesser

Legal Services Manager and Legal Counsel

STATE UNIVERSITIES CIVIL SERVICE SYSTEM



Governance, Risk and Compliance Audit Report (Final)

June 2, 2020

EASTERN ILLINOIS UNIVERSITY

Audit Time Frame:
December 1, 2014 – November 30, 2019

On-Site Visit:
February 10 – 13, 2020

Prepared by:

Lucinda M. Neitzel

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
Final Audit Report

Overview of Specific Areas Subject to Review

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

Assignment of Positions to 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 classification. 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 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 Civil Service employment cycle, utilization and monitoring of non-status appointments, probationary and status employment transactions, and separation programs.

Administration and Employment Protocols of Positions Exempt from Civil Service Regulations

The Auditor completes a review of the employment protocols and assigned responsibilities related to those positions categorically exempt from Civil Service regulations to ensure compliance with the Act and recognized procedures. The Employer's method of exemption, administrative procedures, and related position descriptions are reviewed; and selected incumbent interviews are conducted for validation of approved exemptions.

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.

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 FY2020 Audit Cycle for Eastern Illinois University 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, civil service desk audits, personnel transaction reviews, 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 FY2020 Governance, Risk, and Compliance Audit at Eastern Illinois University, the following risk assessments and areas of focus were communicated to the Employer prior to conducting the audit examination:

Category 1: 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.**

Eastern Illinois University
Final Audit Report

Executive Summary
YEAR ENDED—FY2020

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	1
Category 1 Findings	2
Category 2 Findings	2
Category 3 Findings	1
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>
EIU FY20-01	5	Transition of Exempt Positions to Appropriate Civil Service Classifications
		<u>RISK ASSESSMENT CATEGORY 1 FINDING</u>
EIU FY20-02	8	Exemption Authorization Applied to Positions That Correspond to Civil Service Classification Specifications®
EIU FY20-03	14	Non-Compliance with Temporary Upgrade Provisions®
		<u>RISK ASSESSMENT CATEGORY 2 FINDING</u>
EIU FY20-04	18	Non-Compliance with Extra Help Employment and Position Limitations
EIU FY20-05	22	Employees Paid Outside of Approved Salary Ranges
		<u>RISK ASSESSMENT CATEGORY 3 FINDING</u>
EIU FY20-06	24	Classification of Positions – Non-Compliance with Request for Desk Audit

Eastern Illinois University
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Positive Observation and Auditor Comments

EIU FY20-01	TRANSITION OF EXEMPT POSITIONS TO APPROPRIATE CIVIL SERVICE CLASSIFICATIONS
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CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36e Coverage; and*
- 2) *Illinois Administrative Code (Code), Section 250.30(a) Coverage; and*
- 3) *Exemption Procedures Manual, Section 2, Administrator Exemptions.*

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.

The current Exemption Procedures Manual was approved by the Merit Board and became effective on October 1, 2018. These procedures contain the guidelines and criteria to be used in properly designating and validating exempt positions, and employees in those positions, as exempt from the Act, as categorically defined above.

The Merit Board permits the Designated Employer Representative (DER) at each of the universities and agencies to make an initial determination as to whether a position qualifies as an exemption pursuant to section 36e of the Act. This authority is granted and may be revoked, in whole or in part, at the sole discretion of the Merit Board.

Exemptions are authorized in accordance with current procedures, requiring verification of exemption authorization through the comprehensive development and ongoing review of accurate position descriptions. Accordingly, it is extremely important that employers maintain an updated, accurate, and complete position description for all positions. A routine and regular position review program is necessary to properly assign classification designations and accurately validate exemption status.

Periodic job description reviews, updated procedures, and ongoing classification plan changes may indicate that a position originally identified as exempt from the Act has been revised or changed, and may now fall within civil service classification plan parameters, requiring 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.

BACKGROUND/CONTEXT:

Typically, positions categorically exempt from Civil Service regulations are sampled and reviewed under the purview of a Category 1 Risk Assessment to determine proper designation and exemption from the Act. For this audit, the targeted sample of exempt positions focus primarily on new appointments in the months leading up to the new procedural effective date of October 1, 2018, or after its formal implementation. The Auditor also evaluates this topic area based upon the extent to which an Employer's history related to this specific audit topic impacts the current sampling method and depth of review.

As part of the new GRC Audit Process, the Auditor provides the Designated Employer Representative (DER) with a Pre-Audit Questionnaire prior to requesting materials from which to select an audit sample. As part of this questionnaire, the Employer was required to provide their policy and procedure for exempting positions from Civil Service regulatory guidelines, which was provided to the Auditor in the response indicated below:

The Employer's Policy for the Exemption of Positions and Ongoing Review of Position Descriptions:

1. *"To the extent that [we] are aware of a position opening, [we] review new job descriptions for any new openings. We assume that the position is civil service until we cannot classify in a civil service position and/or if it meets any of the allowable exempted positions."*
2. *"Every VP Office, as well as the President's Office, are held accountable for ensuring that updated job descriptions exist in A & P files. This is something EIU's internal auditor tests for, as do external auditors."*

CONDITIONS/FACTS:

Consistent with the targeted audit sampling method previously described, on January 30, 2020, the Auditor requested a small sample of **forty-five (45)** exempt position descriptions the Employer identified through payroll documents as categorically exempt under 36e(3) or 36e(4) of the Act.

Prior to the on-site audit visit dated February 10-13, 2020, the Employer provided information to the Auditor with a listing of positions included in the sample that were already under review by the Employer for conversion to Civil Service. Prior to issuing this Draft Audit Report, the Auditor received

information from the Employer that these positions were in fact transitioned to Civil Service on or before April 1, 2020. These **fifteen (15)** positions are included below in **Table 1:**

Exempt Appointments
Sampled Positions Transitioned to Civil Service Classification Specifications

Table 1:

Employee Name	Title	Date of Employment	Date of Appointment in Position	Position Number	Annual Salary
██████████	Museum Education Coordinator	6/1/2018	6/1/2018	A00500	\$45,450
██████████	Interim Sound Engineer	8/15/2016	7/1/2019	A99150	\$40,000
██████████	Unit Director	7/7/2008	7/7/2008	A0842A	\$33,185
██████████	Coordinator, International Students	9/24/2018	9/24/2018	A07950	\$35,350
██████████	Interim Director, Campus Recreation	8/1/2005	8/1/2005	A0433A	\$62,606
██████████	Assistant Director, New Student Programs	8/10/2015	5/14/2018	A05430	\$40,400
██████████	Student Standards Specialist	5/19/2015	8/1/2016	A98350	\$40,061
██████████	Director, Engagement and Volunteerism	12/1/2010	1/18/2016	A98840	\$53,045
██████████	Director of Development Services	5/7/2001	10/10/2001	A06800	\$56,106
██████████	Director, Student Disability Services	8/13/2018	8/13/2018	A07630	\$65,448
██████████	Compliance Coordinator	5/14/2018	5/14/2018	A05640	\$45,301
██████████	Unit Director	7/16/2018	7/16/2018	A01400	\$48,480
██████████	Coordinator	4/2/2018	4/2/2018	A02040	\$50,500
██████████	Interim Director of Greek Life	8/16/2013	1/12/2015	A0801A	\$48,965
██████████	Director of Orientation	1/3/2018	1/3/2018	A01020	\$63,246

AUDITOR'S COMMENTS:

Based on the Employer's review of the fifteen (15) positions noted above and the Auditor's review and interview of various employees, the Auditor concurs that these positions correspond to various standard and/or custom Civil Service classification specifications that contain flexible structures in the professional, semi-professional, technical, and managerial occupational areas.

The Auditor commends the Employer for their prompt attention to compliance in this matter consistent with statutory requirements and Merit Board procedures.

Eastern Illinois University
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation and Administrative Response

EIU FY20-02	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; and*
- 3) *Exemption Procedures Manual, Section 2, Administrator Exemptions.*

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.

The current Exemption Procedures Manual was approved by the Merit Board and became effective on October 1, 2018. These procedures contain the guidelines and criteria to be used in properly designating and validating exempt positions, and employees in those positions, as exempt from the Act, as categorically defined above.

The Merit Board permits the Designated Employer Representative (DER) at each of the universities and agencies to make an initial determination as to whether a position qualifies as an exemption pursuant to section 36e of the Act. This authority is granted and may be revoked, in whole or in part, at the sole discretion of the Merit Board.

Exemptions are authorized in accordance with current procedures, requiring verification of exemption authorization through the comprehensive development and ongoing review of accurate position descriptions. Accordingly, it is extremely important that employers maintain an updated, accurate, and complete position description for all positions. A routine and regular position review program is necessary to properly assign classification designations and accurately validate exemption status.

Periodic job description reviews, updated procedures, and ongoing classification plan changes may indicate that a position originally identified as exempt from the Act has been revised or changed, and may now fall within civil service classification plan parameters, requiring 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.

BACKGROUND/CONTEXT:

Typically, positions categorically exempt from Civil Service regulations are sampled and reviewed under the purview of a Category 1 Risk Assessment to determine proper designation and exemption from the Act. For this audit, the targeted sample of exempt positions focus primarily on new appointments in the months leading up to the new procedural effective date of October 1, 2018, or after its formal implementation. The Auditor also evaluates this topic area based upon the extent to which an Employer's history related to this specific audit topic impacts the current sampling method and depth of review.

As part of the new GRC Audit Process, the Auditor provides the Designated Employer Representative (DER) with a Pre-Audit Questionnaire prior to requesting materials from which to select an audit sample. As part of this questionnaire, the Employer was required to provide their policy and procedure for exempting positions from Civil Service regulatory guidelines, which was provided to the Auditor in the response indicated below:

The Employer's Policy for the Exemption of Positions and Ongoing Review of Position Descriptions:

1. *"To the extent that [we] are aware of a position opening, [we] review new job descriptions for any new openings. We assume that the position is civil service until we cannot classify in a civil service position and/or if it meets any of the allowable exempted positions."*
2. *"Every VP Office, as well as the President's Office, are held accountable for ensuring that updated job descriptions exist in A & P files. This is something EIU's internal auditor tests for, as do external auditors."*

CONDITIONS/FACTS:

Consistent with the targeted audit sampling method previously described, the Auditor requested a small sample of **forty-five (45)** position descriptions the Employer identified as categorically exempt under 36e(3) or 36e(4) of the Act.

In addition to the positions previously referenced in this report and contained in **Table 1**, the Auditor reviewed the remaining sampled positions, including on-site interviews with various employees, and identified **seven (7)** positions that appeared to be performing duties and responsibilities consistent with those found in Civil Service classification specifications. These positions are included in **Table 2** below:

Exempt Appointments

Position Descriptions Matching Civil Service Classification Specifications

Table 2:

Employee Name	Title	Date of Employment	Date of Appointment in Position	Position Number	Annual Salary	Recommended Civil Service Classification Options
██████	Associate Director, Housing and Dining Business Operations	3/26/2018	3/26/2018	A00440	\$75,750.00	Housing Administration Series, Housing Maintenance Supervisor, Superintendent of Building and Grounds
██████	Director	9/5/2007	8/16/2008	A99320	\$54,094.56	Program Director
██████	Interim Associate Director, Housing and Dining	3/10/2014	3/10/2014	A0191A	\$65,852.46	Housing Administration Series, Housing Maintenance Supervisor, Superintendent of Building and Grounds
██████	Director, Purchasing	8/14/2010	8/14/2010	A08520	\$88,880.00	Procurement Officer Supervisor
██████	Assistant Director, Illinois Higher Education Center	3/1/2019	8/5/2019	A98830	\$38,000.00	Grants and Contracts Associate or Health Education Coordinator
██████	Interim Assistant Director, Registrar's Office	10/22/2007	10/22/2007	A0798A	\$47,124.00	Administrative Aide, Program Coordinator, Program Director
██████	Associate Director, Recruiting, Campus Visits, and Special Events	8/16/2011	9/1/2013	A0429A	\$44,496.00	Program Coordinator, Program Director, Events Administrator Associate

CAUSE/SOURCE OF CONDITION:

All universities and agencies differ in their organizational structures. Within each institution, the administrative offices, colleges, and various departments all differ in many respects in terms of size and scope. As a result, institutions must utilize an internally developed process for properly analyzing positions and determining exemptions consistent with the Act, Code, and Exemption Procedures Manual.

Consistent with the review of position description documents in the requested sample, the Auditor again observed missing components in many of the documents reviewed. It was noted during the current FY2020 Audit, and conveyed to the campus during previous audits, that educational

requirements, knowledge, skills, or abilities were notably absent from the majority of position descriptions. While position designation and classification are based primarily on the duties of a given position, it is difficult to justify an exemption from Civil Service regulations when those standard components are absent.

EFFECT/IMPACT:

The Merit Board permits the Designated Employer Representative (DER) at each university and agency to make an initial determination as to whether a position qualifies as an exemption pursuant to section 36e of the Act. However, this authority is granted and may be revoked, in whole or in part, at the sole discretion of the Merit Board. Therefore, the authority of the DER is an extension of the Merit Board, making the DER responsible for developing and maintaining position management protocols consistent with statutory and procedural guidelines related to this topic.

Exemption status is determined primarily by a thorough and comprehensive review of the position description. It is, therefore, extremely important that employers maintain an updated, accurate, and complete position description for all positions. As the University System implements changes to the Civil Service classification plan, individual positions at each university and agency also change and evolve over time. Therefore, a routine and regular position review program is necessary in order to properly assign classification designations and accurately validate exemption status.

The comprehensive analysis and evaluation of individual position descriptions is instrumental in preventing the inappropriate identification and designation of positions, inaccurate exemption authorizations, and potential violations of the Act, Code, and Procedures. Employees that occupy positions incorrectly designated as exempt from the Civil Service Act are being denied specific employment rights and protections under the Act.

FINDING(S) FROM PREVIOUS AUDIT(S):

During the FY2015 Biennial Compliance Audit, the Auditor reviewed approximately one-hundred (100) exempt position descriptions and identified **twenty (20) positions** that were performing duties comparable to those found in various Civil Service classification specifications.

Similarly, during the FY2013 Biennial Compliance Audit, the Auditor selected a sample of one-hundred (100) exempt position descriptions and determined that **twenty-eight (28) positions** were performing duties matching the specifications for various Civil Service classifications. *[Finding Codes EIU FY15-01, pages 4-6 and EIU FY13-01, pages 4-8].*

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, Sections 1 through 5, approved by the Merit Board and effective October 1, 2018. The Designated Employer Representative (DER) of each university and affiliated agency has the responsibility of developing and maintaining protocols consistent with the statutory and procedural guidelines related to this important delegated authority. The Auditor recommends that the Employer again review their policies with

respect to exempting positions consistent with the Exemption Procedures Manual, Section 3.2 related to Internal Review and Accountability for exemption authorization.

The System Office has historically emphasized that the cornerstone of position control management lies with the proper administration and maintenance of the position description. As mentioned previously in this finding, and consistent with the review of position description documents in the requested sample, the Auditor observed missing components in many of the documents reviewed. These missing components include educational and experience requirements, as well as specific knowledge, skills, and abilities considered necessary for satisfactory performance and completion of the duties in a given position. While position designation and classification are based primarily on the duties, it is difficult to justify an exemption from Civil Service regulations when those standard fundamental components are absent.

Therefore, with respect to the majority of positions referenced in this finding, it is requested that the Employer provide the Auditor with updated position descriptions that contain these standard components to determine the appropriate position designation. Following that process, if the Employer maintains that the positions should remain exempt, the Exemption Procedures Manual, Section 3.3, Accountability for Exemption Authorization outlines specific interactive steps, outcomes, and/or the timeframe for individual position appeals if necessary.

The Employer is reminded that the University 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. 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 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”.

EMPLOYER’S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDA HOLLOWAY, INTERIM DIRECTOR OF HUMAN RESOURCES:

The University agrees with recommendation. Employer concurs with the initial basis of the finding. The employer wishes to note that the review of Administrative Professional positions is on-going and some of the positions noted are already currently in review. The initial conversion included positions, if you will, considered low hanging fruit that were easily identifiable either by prior audits and/or employer knowledge of the position responsibilities. As we continue to review position descriptions, determinations will continue to be made to comply with the Civil Service procedural rules.

ADDITIONAL AUDITOR COMMENTS:

The Employer provided updated position descriptions consistent with Auditor recommendations. The Employer is also reminded that the Exemption Procedures Manual, Section 3.3, Accountability for Exemption Authorization, provides instructions regarding the conversion of exempt positions to Civil Service when inappropriate exemptions are discovered during the audit process. The Employer will have the choice to convert the position/incumbent to the appropriate Civil Service classification:

1. Immediately upon agreement with the employee, or
2. When the current contract ends, which includes any institutional notice of non-reappointment period, or
3. By the end of the fiscal or academic year or similar timeframe, or
4. If the position becomes vacant.

NOTE: A position/incumbent must be converted within a maximum of 16 months from the University System's decision that the position should be designated as Civil Service.

Eastern Illinois University
Final Audit Report

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

EIU FY20-03 NON-COMPLIANCE WITH TEMPORARY UPGRADE PROVISIONS

CRITERIA/STANDARDS:

- 1) *Illinois Administrative Code (Code), Section 250.100 Reassignments and Transfers; and*
- 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, "[u]pgrading 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."

BACKGROUND/CONTEXT:

The utilization of a Temporary Upgrade assignment is reviewed and analyzed under a Category 1 Risk Assessment to determine whether the duration of assignments do not exceed thirty (30) consecutive work days in duration. As a practical matter, this topic is audited during every cycle at each Employer location that routinely utilizes these assignments. For Eastern Illinois University, the total number of days in a Temporary Upgrade status reported during this audit time frame provides a level of compliance risk under Category 1/Serious Impact.

As a secondary part of the review of this topic, temporary upgrades that continue for an extended period of time, even though they may not exceed the thirty (30) day limitation in any one singular time frame or assignment, may convey the need for a permanent position at the upgraded classification.

CONDITIONS/FACTS:

Prior to the on-site audit visit, the Auditor requested materials from the Employer with respect to Temporary Upgrade assignments. As outlined in the Audit Request Material Checklist, sent to the Employer on December 23, 2019, this data request is referenced in Section IV (B), Employment and Separation Procedures, *Temporary Upgrade Assignments*. The data elements requested included employee name, classification, assigned upgrade classification, **specific days of upgrade assignment**, exam score, and date of exam. For the vast majority of upgrade assignments, the column headers did not contain specific dates within the pay periods listed, therefore, in the tables below, the Auditor was unable to provide the exact dates of upgrade.

Based on the report submitted by the Employer, the Auditor reviewed a listing of approximately eighty-eight (88) employees assigned temporary upgrades during the audit time frame, accounting for approximately four-thousand twenty-six (4,026) upgraded days.

As documented in **Table 3** below, four (4) employees appeared to exceed the 30-day temporary upgrade limitation:

Table 3:

<i>FY2020 Governance, Risk, and Compliance (GRC) Audit</i>		
<i>Temporary Upgrade Assignments Exceeding the 30-Day Limitation</i>		
<i>Employee Name</i>	<i>Upgrade Transaction and Timeframe</i>	<i>Total Number of Days Upgraded</i>
██████████	<i>Building Service Worker to Building Service Sub-Foreman 3/31/17 – 5/16/17</i>	33
██████████	<i>Brickmason to Brickmason Foreman 1/3/17 – 2/16/17</i>	33
██████████	<i>Brickmason to Brickmason Foreman 7/5/17 – 8/25/17</i>	42
██████████	<i>Painter to Painter Sub-Foreman 7/16/18 – 8/31/18</i>	36
██████████	<i>Painter to Painter Sub-Foreman 9/25/18 – 11/6/18</i>	31
██████████	<i>Building Service Worker to Building Service Sub-Foreman 9/3/17 – 10/16/17</i>	32

As documented in **Table 4** below, five (5) employees appeared to be improperly upgraded on a long term and consistent basis:

Table 4:

<i>FY2020 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>Police Officer to Police Sergeant</i>	400
██████████	<i>Brickmason to Brickmason Foreman</i>	161
██████████	<i>Police Officer to Police Sergeant</i>	323
██████████	<i>Painter to Painter Sub-Foreman</i>	170
██████████	<i>Tree Surgeon to Grounds Foreman</i>	220

CAUSE/SOURCE OF CONDITION:

The evidence provided by the Employer suggests that a determination was made not to fill upgraded positions with a permanent status employee or by promotion through a reclassification action and instead, the Employer continued in the overuse of the temporary upgrade provision, particularly for extended periods of time in excess of one-hundred days.

EFFECT/IMPACT:

The foundation of the Merit System and the primary concept of a classification plan management system is 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 Act and the Classification Plan Management system.

If a position is upgraded frequently, or is upgraded on a continual basis for an extended period of time, the employee should in effect be promoted, reclassified into the classification, or a new position posted and filled in the classification. Section 36d of the Act, under “Power and duties of the Merit Board” states the following:

§ 36d. Powers and Duties of the Merit Board. The Merit Board shall have the power and duty –

(8) To provide by its rules for promotions in the classified service. Vacancies shall be filled by promotion whenever practicable. For the purpose of this paragraph, an advancement in class shall constitute a promotion.

FINDING(S) FROM PREVIOUS AUDIT(S):

During the FY2015 Biennial Compliance Audit, the Auditor reviewed approximately one hundred thirteen (113) employees provided temporary upgrade assignments within the audit time frame. As documented in that report, it was discovered that four (4) employees exceeded the thirty-day temporary upgrade limitation. In addition, it was discovered that fifteen (15) employees were utilized in a temporary upgrade capacity for extended periods of time and/or appeared to be regularly upgraded on an extended and consistent basis. *[Finding Code EIU FY2015, pages 7-8]*

RECOMMENDATIONS TO EMPLOYER:

During the FY2015 Biennial Compliance Audit, this topic was cited as a material finding. At that time the Employer indicated in their Institutional Corrective Action Plan that they remained neutral in the citation of this audit issue. This response indicated that there was a difference in interpretation between the Auditor and the Employer regarding the implementation of the Temporary Upgrade provision. However, the Employer committed to reviewing this topic, review the manner in which Temporary Upgrades were utilized, and then make an adjustment in order to achieve future compliance.

While the Auditor understands that employees are appropriately compensated during a Temporary Upgrade, those employees do not accrue seniority in the upgraded classification and are not provided the opportunity for continued compensation beyond the Temporary Upgrade period. 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 is requesting additional detail from the Employer with respect to the report submitted for review for this audit. This includes providing the Auditor with specific dates of upgrade as initially requested no later than **May 8, 2020**.

The Auditor requests that Temporary Upgrades on an extended basis be discontinued and that these specific transactions are monitored consistent with the Code. In addition, employees referenced in this finding should be reclassified to the appropriate classification.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDA HOLLOWAY, INTERIM DIRECTOR OF HUMAN RESOURCES:

The University neither agrees or disagrees with the foundation of this finding.

While the University makes every effort to comply with Civil Service rules or intent of the rules, during the audit period the University experienced unprecedented times with the State of Illinois Budget Impasse, along with Eastern Illinois University's declining enrollment. The combination of these critical activities prevented the University from making business decisions that we potentially could not support for the long term.

With reference to the upgrade findings, please note the following updated information:

1. [REDACTED] has been permanently placed in the Brick-mason Foreman position.
2. [REDACTED] has been permanently placed in the Painter Foreman position.
3. [REDACTED] has been permanently placed in the Police Sergeant position.
4. [REDACTED] has been permanently placed in the Police Sergeant position.

ADDITIONAL AUDITOR COMMENTS:

The Employer provided updated Temporary Upgrade report information related to the specific dates of upgrade consistent with Auditor recommendations.

NOTE: A secondary review was conducted of this updated report and changes have been made to the data points contained in the original finding as a result. These changes do not affect the overall risk assessment of issues related to this topic.

The Auditor recognizes the challenges associated with the budget impasse and the significant impact this had on University System Employers. However, the rules are clear regarding the 30-day limitation, the intent behind the temporary nature of the rule provision is apparent, and the documents provided by the Employer indicate what the facts of the transactions are. Again, it should be noted that employees working in a temporary upgraded status for an extended period of time do not receive seniority rights to the higher classification while upgraded. Even though they are being compensated monetarily, employees utilized in this manner are still being harmed due to the inability to accumulate seniority at the higher classification, which could result in negative consequences in the event of a future layoff.

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Risk Assessment Category 2 Finding
Recommendation, Administrative Response, and Additional Auditor Comments

EIU FY20-04	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; and*
- 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 "[u]pon 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.

BACKGROUND/CONTEXT:

The utilization of Extra Help appointments and positions are typically reviewed and analyzed as a Category 1 Risk Assessment to determine whether both components of the 900-hour limitation were adhered to in accordance with the Illinois Administrative Code. As a practical matter, this category of

importance indicates that the topic is audited during every cycle at each Employer location that routinely utilizes these appointments.

However, since this topic was not cited at Eastern Illinois University during the FY2015 audit time period, the Auditor selected a fractional time period sample of Extra Help appointments utilized from December 1, 2017, through November 30, 2019, which accounts for only part of the five (5) year compliance audit time frame.

CONDITIONS/FACTS:

The Auditor reviewed **three hundred fifty-six (356)** Extra Help appointments, which encompassed one-hundred eighty-nine (189) employees and two-hundred sixty-eight (268) positions.

As documented in *Table 5* below, **four (4) employees** appear to have worked beyond the 900-hour limitation without the required 30-day break in service:

Table 5:

<i>FY2020 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>
██████████	T07901	1,242.50
██████████	T90102	902.50
██████████	T91402	1,004.00
██████████	T91401	1,255.50

As documented in *Table 6* below, **five (5) 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 6:

<i>FY2020 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>
T04503	██████████	1,006.00
T05916	████████████████████	1,000.75
T09804	████████████████████	959.00
T91002	██████████	924.75
T91101	██████████	1,172.00

CAUSE/SOURCE OF CONDITION:

During the FY2011 and FY2013 audits, the Auditor worked collaboratively with the Employer to allow new processes to be implemented regarding Extra Help position control monitoring protocols. Once those new processes were implemented, the Auditor reviewed this topic again during the following FY2015 Biennial Compliance Audit. At that time, it was shown that those new protocols resulted in significant improvement in the Employer's monitoring of this employment activity during the FY2015 Biennial Compliance Audit time frame, ultimately resulting in no findings for this topic area during that audit.

While these improvements have been implemented and observed by the Auditor, it does appear that the 900-hour limitation was exceeded during the current FY2013 Biennial Compliance Audit period in some instances. The current FY2020 Governance, Risk, and Compliance Audit outcome related to this topic indicates that the processes and protocols implemented during previous audit periods likely need to be further communicated and reinforced at the department level to adequately monitor and regulate Extra Help positions, and employees assigned to those positions, in accordance with Section 250.70(f) of the Code.

EFFECT/IMPACT:

Employer position management practices related to Extra Help appointments during this 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 appointments appear to be utilized longer than allowed in some instances, impacting the overall employment environment, which is inconsistent with the Illinois Administrative Code and Employment/Separation Procedures Manual.

Administrative Note: For any employee with an approved extra help extension, the Auditor was unable to determine, based on the pay period data submitted by the Employer, the specific dates worked by any of the cited employees or positions that may have warranted the extension. If dates and/or hours worked exceed the approved extension time frame, it becomes an audit finding under limitation requirements outlined in the Code.

FINDING(S) FROM PREVIOUS AUDIT(S):

No findings in this topic area were made during the last operational audit in FY2015. Please refer to previously noted observations above for further information related to FY2013 and FY2011.

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 requirements must be validated by adequately demonstrating the proper management of this employment activity, and by adhering to strict time frame limitations.

Due to the low quantity of Extra Help employee and position violations during the specific audit period of December 1, 2017, through November 30, 2019, this topic is being reported as a Category 2 Risk Assessment. The risk of additional non-compliance during the next audit may become elevated if additional accountability measures are not implemented at the department level at this time. We recommend that the Employer conduct an internal review of their procedures to identify and rectify

deficiencies with respect to the Extra Help monitoring process and potentially implement stricter accountability standards. If necessary, additional reinforcement provided by campus administrators may be required to properly address specific instances where the risk of non-compliance is the greatest in order to alleviate future findings in this respect.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDA HOLLOWAY, INTERIM DIRECTOR OF HUMAN RESOURCES:

University agrees with the recommendation.

Eastern Illinois University
Final Audit Report

Risk Assessment Category 2 Finding
Recommendation and Administrative Response

EIU FY20-05	EMPLOYEES PAID OUTSIDE OF APPROVED SALARY RANGES
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CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d(3) Powers and Duties of the Merit Board;*
- 2) *State Universities Civil Service Act (Act), Section 70/36k(1) Regional Compensation and Registers; and*
- 3) *Pay Administration Procedures Manual, Sections 1 – 3 Procedures.*

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 Salary Data System, as described in the Pay Administration Procedures Manual, is the instrument by which pay rates and ranges are submitted and authorized. This reconciliation process captures those employees being paid outside of approved salary ranges, provides the Employer with reports as needed, and allows the Auditor to generate an Exception Report of ranges that require update. These Exception Reports are then provided to the appropriate Employer for review and action.

BACKGROUND/CONTEXT:

The update of salary ranges are typically reviewed and analyzed under the purview of a Category 3 Risk Assessment. Ordinarily, upon notification, the Employer will make necessary corrections promptly and efficiently to prevent the risk of undercompensating or overcompensating employees. It is also important to note that classifications are not authorized for use until a range is established in the University System Salary Data System. As a practical matter, this category of importance indicates that the topic is audited during every cycle at each Employer location that does not routinely update their classification ranges.

CONDITIONS/FACTS:

The Auditor reviewed Civil Service payroll documents submitted by the Employer to determine whether Civil Service employee salary rates were paid within established salary ranges. Upon initial review, it appeared that approximately one-hundred ninety-seven (197) employees either did not have an established rate/range, or they were compensated outside the established rate/range as utilized and approved in both open range and negotiated classifications.

On February 10, 2020, prior to the on-site audit visit, the Employer was notified of these discrepancies and was instructed to correct the information for those employees whose salary rates/ranges were inconsistent with regulatory standards. On February 17, 2020, the Auditor provided the Employer with

the Preliminary Observation Report, which contained a list of remaining flags to be cleared no later than March 6, 2020. As of the date of this report, according to live data contained in the Salary Data System, there are thirty-nine (39) employees whose ranges that require updating, many of which appear to be paid below the minimum of the established range.

CAUSE/SOURCE OF CONDITION:

Many salary rate/range adjustments were not routinely updated through the Salary Data System during the audit time frame to maintain and reconcile approved salary components in accordance with designated procedures.

EFFECT/IMPACT:

Inaccurate salary information within the Salary Data System negatively impacts the credibility and integrity of published ranges utilized by the entire system in their compensation management programs. The Employer risks significant financial liability in the overpayment or underpayment of employees, as well as non-compliance with the Act and its corresponding procedures.

FINDING(S) FROM PREVIOUS AUDIT(S):

No findings in this topic area were made during the last operational audit in FY2015.

RECOMMENDATION TO EMPLOYER:

As previously noted in this finding, the Employer has provided updates to several employee ranges; however, it appears that there are employees still paid outside the established rate/range. With respect to any negotiated rates/ranges, it is imperative that salary modifications are promptly entered at the conclusion of the collective bargaining process to accurately reflect any rate/range changes.

The Auditor requests that the Employer continue to submit salary range adjustments as soon as possible to the System Office to alleviate discrepancies. The Auditor further recommends that proper business protocols regarding routine salary reconciliation activities be implemented and followed, by reviewing Salary Data System Reports and making salary rate adjustments accordingly as they occur.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDA HOLLOWAY, INTERIM DIRECTOR OF HUMAN RESOURCES:

Employer agrees with recommendation.

Human Resources staff has now made necessary and requested adjustments that were in question. SUCSS data system has also been updated.

Eastern Illinois University
Final Audit Report

Risk Assessment Category 3 Finding

Recommendation, Administrative Response, and Additional Auditor Comments

**EIU FY20-06 CLASSIFICATION OF POSITIONS – NON-COMPLIANCE WITH REQUEST FOR
DESK AUDIT**

CRITERIA/STANDARDS:

- 1) *Illinois Administrative Code (Code), Section 250.30(b)(1) Class Specifications; and*
- 2) *Classification Procedures Manual, Section 2.1 Employer Responsibilities.*

The Illinois Administrative Code (Code), Section 250.30(b)(1) Class Specifications, provides that “[t]he 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.”

Positions are then allocated to an appropriate classification based on a review of the position description. In accordance with the Classification Procedures Manual, Section 2.1 Employer Responsibilities, the Executive Director has delegated to each Employer the authority to assign positions to Civil Service classifications, subject to post-action audit or review by the University System Office.

BACKGROUND/CONTEXT:

Consistent with the standards outlined in this finding, the classification of a Civil Service position is reviewed and analyzed under the purview of a Category 3 Risk Assessment. During the on-site visit, the Auditor reviews several Civil Service positions, interviews various employees in those positions, and provides instructions to the Employer regarding a desk audit if a change in classification is recommended. Upon completion of the desk audit, the Employer submits their findings to the Auditor for consideration in determining whether a finding regarding this topic will be cited. As a practical matter, this risk assessment category indicates that a resolution to any findings under this topic area are easily rectified.

CONDITIONS/FACTS:

While on-site, it was determined that one (1) Civil Service employee listed below, may be misclassified. Review of the position description and on-site interview with the employee suggests a move to the recommended classification. During the on-site outbrief and Preliminary Observation Report conference, the Auditor requested a desk audit be conducted for the following employee with a deadline of March 6, 2020, for response to the Auditor:

Employee

██████████

Current Classification

Payroll Specialist I

Recommended Classification

Payroll Specialist II

During the audit outbrief, the Auditor conveyed to the Employer that an employee, [REDACTED], Senior Library Specialist, requested a desk audit be conducted of her position to the Library Operations Associate classification. This request was conveyed during the Auditor's meeting with the EIU Staff Senate.

CAUSE/SOURCE OF CONDITION:

According to the Employer, the work in the position reviewed by the Auditor has evolved with the employee and needs of the department. At the time of the on-site audit visit, department representatives and/or employees had not requested desk audits for this position.

EFFECT/IMPACT:

Inaccurate assignment of positions to classes negatively affects the overall classification plan management process, resulting in inaccuracies related to job content, work assignments, and compensation components. For example, salary survey information is tainted by those positions that are not accurately assigned.

FINDING(S) FROM PREVIOUS AUDIT(S):

No findings in this topic area were made during the last operational audit in FY2015.

RECOMMENDATION TO EMPLOYER:

It is recommended that the Office of Human Resources review these positions for proper classification assignment and report their findings to the System Office no later than **May 8, 2020**.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDA HOLLOWAY, INTERIM DIRECTOR OF HUMAN RESOURCES:

In regards to [REDACTED], the university disagrees that the employee currently performs functions equal to that of a Payroll Specialist II. The university believes the position description inaccurately reflected the true duties of the employee and that the position description over-stated responsibilities. The University does acknowledge this was due to an inappropriate review of the job description as submitted and will work with the employee to construct an accurate job description.

In regards to [REDACTED], a desk audit has still not been requested by the department. The University will work with the department to ensure that [REDACTED] is correctly classified.

ADDITIONAL AUDITOR COMMENTS:

The Auditor is not disputing the accuracy of the position description, but rather, is requesting that a desk audit be conducted for the position to determine proper classification. As a follow up, once an accurate position description is completed, it is requested that the desk audit documentation be submitted to the Auditor for review as soon as possible, but not later than **June 30, 2020**.