

# STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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July 13, 2012

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Merit Board Member  
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The State Universities Civil Service System respectfully submits the Final Audit Report of the Biennial Institutional Compliance Audit conducted at Western Illinois University. The audit period tested was November 1, 2009 through October 31, 2011. This report is intended to communicate the final material findings, recommendations and corresponding institutional responses formulated through a comprehensive human resource compliance and operational audit.

On behalf of the audit staff, we thank Western Illinois University 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 call Lucinda M. Neitzel (217) 278-3150 ext. 239.

[REDACTED]  
Lewis T. (Tom) Morelock  
Executive Director

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# Western Illinois University Final Audit Report

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## State Universities Civil Service System Compliance Audit

July 13, 2012

Audit Period

November 1, 2009 to October 31, 2011

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Prepared by:



Lucinda M. Neitzel  
Audit and Advisory Services Manager

**Western Illinois University**  
**Final Audit Report**

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**Introduction**

**PURPOSE**

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 purpose of the State Universities Civil Service System is to establish a sound program of personnel administration for its constituent employers (110 ILCS 70/36b(2)). To achieve this purpose, the Merit Board has been given a broad range of statutory powers and duties, which include the power to make rules to carry out the purpose of the State Universities Civil Service System and to appoint an Executive Director to administer the Act (110 ILCS 70/36d(11) and (12)).

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

This report communicates the final outcome of a comprehensive human resource operational audit, which included an on-site evaluation that was conducted February 21-24, 2012. An Exit conference was conducted on June 25, 2012 and provided an opportunity for the Employer to discuss both the Material and Non-Material findings contained in the initial Draft Audit Report. Upon completion of the exit conference and submission of the Institutional Corrective Action Plan, a Final Audit Report (Material Findings only) is sent to the Employer, and a Supplemental Report (Non-Material Findings) is sent to the campus/agency Human Resource Office for internal use.

**OVERVIEW**

The following Human Resource activities were reviewed and utilized in identifying the Material (Final Audit Report) and Non-Material Findings (Supplemental 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 Principal Administrative Appointments (PAA)**

The Auditor completes a review of the employment protocols and assigned responsibilities for Principal Administrative Appointments. This review is conducted to assure compliance with 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.

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

**Lucinda Neitzel, Audit and Advisory Services Manager**

**Jeff Brownfield, Manager of Operations Division**

**Marchant Martinelli, Human Resource Associate**

**Paula Mitchell, Human Resource Assistant**

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**Executive Summary**  
**YEAR ENDED -- FY2012**

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

**SUMMARY OF MATERIAL FINDINGS**

<b><u>Number of</u></b>	<b><u>This Report</u></b>
Findings	1
Repeated findings from previous audit®	1®

**SCHEDULE OF MATERIAL FINDINGS**

<b><u>Item Number</u></b>	<b><u>Page</u></b>	<b><u>Description</u></b>
WIU FY12-01	7	FINDINGS (STATE UNIVERSITIES CIVIL SERVICE ACT) Exemption Authorization Applied to Positions That Match Civil Service Classification Specifications

**Western Illinois University**  
**Final Audit Report**

**Material Findings, Recommendations, Institutional Corrective Action  
Plan, and Additional Auditor Comments**

**ENGAGEMENT:** Western Illinois University

**FINDING:** Exemption Authorization Applied to Positions That Match Civil Service  
Classification Specifications

**MATERIAL**          X          **NON-MATERIAL**      \_\_\_\_\_

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

- 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 1.1 Overview*
- 4) *Exemption Procedures Manual, Section 3.1 Principal Administrative Appointments*
- 5) *Exemption Procedures Manual, Section 6.3 System Office Review*
- 6) *Exemption Procedures Manual, Section 8.2 Changing an Exempt Position to a Civil Service Position*

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

Periodic job description review and update procedures may indicate that a position originally identified as a Principal Administrative Appointment (PAA) may have incorrectly been classified or may have changed to the point whereby a department now must convert this position, and any employee currently occupying these positions, to an identified and appropriate Civil Service classification.

In this respect, biennial compliance audits of University System employers will include, but not be limited to:

- Comprehensive review of position descriptions
- Compliance with statutory and procedural criteria for exemptions

- Adequacy and thoroughness of related employment procedures
- Adequacy of internal review and approval processes
- Thoroughness and accuracy of quarterly reporting requirements
- Any other associated special interest items

When it has been determined and established that the job responsibilities and duties of a position do not meet the criteria for a PAA exemption under Section 36e(3), the Employer may be required to change the position from an exempt appointment to an appropriate Civil Service appointment in a recognized classification.

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

Through a review of approximately eighty (80) position descriptions, including on-site interviews with various exempted employees, it was determined that forty (40) exempted positions listed in **Appendix A** were performing duties matching the specifications for various Civil Service classifications. The cited positions simply do not contain the duties or level of authority and responsibility that would typically fall outside the specifications of standard professional or technical Civil Service classifications.

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

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

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

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

**Finding from Previous Audit:**

During the FY2010 compliance audit, through a review of approximately fifty (50) position descriptions, including on-site interviews with various exempted employees, it was determined that six (6) exempt positions were performing duties matching the specifications for various Civil Service classifications. Additionally, during the FY2008 compliance audit, through a review of approximately fifty (50) position descriptions, including on-site interviews of various exempted employees, it was determined that four (4) of the exempt positions were performing duties matching the specifications for various Civil Service classifications. *[Finding Code WIU FY10-01, pages 5-8 and Finding Code WIU FY08-01, pages 4-5].*

**Recommendation:**

The Illinois Administrative Code, Section 250.30(a) specifically 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*, approved by the Merit Board in June 2009. By definition, a PAA is “...an employee who is charged with high level administrative responsibilities, whose decisions are based on administrative policies, and who exercises discretion and independent judgment. In addition, a PAA can be defined as an employee who is in a position requiring knowledge of an advanced type in a field of science or learning customarily acquired by a prolonged course of specialized intellectual instruction and study...and which requires the consistent exercise of discretion and judgment, e.g., physician, attorney, engineer, architect.”

In accordance with the statutory intent and basic premise contained in these standards, the assignment of positions to Civil Service classifications when the position description matches appropriate classification specifications must take precedence over the use of exemptions through utilizing general titles. Improper exemptions from Civil Service regulations can lead to a fundamental breakdown of several interrelated human resource functions; including employment status, position classification, seniority, recruitment, compensation, performance, and benefit administration.

We recommend that the Employer complete an in-depth review of the position descriptions for the positions listed in **Appendix A** to further determine if they meet Civil Service classification specifications. *Specifically, 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 Civil Service classification specifications, 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. 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.

### **Institutional Corrective Action Plan—provided by Pamela L. Bowman, Director of Human Resources**

The State Universities Civil Service System (SUCSS) protocols, rules and procedures in the establishment of these positions have been followed. In addition, through our triennial review

and internal protocols, we provide additional scrutiny to determine the appropriate classification.

Of the 80 position descriptions under review by SUCSS, 40 positions were identified as meeting civil service classification specifications and of those 40, seven of the incumbents were interviewed by SUCSS.

- We agree, in part, with 11 of the 40 positions identified. Upon vacancy, we will review these positions to determine if they meet classifications as identified in our analysis, and if so, we will convert the position to the appropriate civil service classification.
- As for the remaining 29 positions, and indicated during the teleconference, the suggested civil service classifications do not encompass the scope or capacity in which the positions function and we disagree with the evidence supporting the finding and/or the findings and recommendation.

We will continue our internal review protocols. If at any point during our review the University finds a position should be classified as civil service, the University will convert the position upon vacancy.

**Additional Auditor Comments:**

At the Employer's request, a formal Exit Conference was conducted on June 25, 2012 and secondary review of several positions cited in **Appendix A**, specifically the twenty-nine (29) positions listed above, was proposed. To facilitate this request, additional position audit documentation and/or job analysis data was required in order to more comprehensively analyze these positions. The Employer only submitted a short narrative of each of the 29 positions identified as being of concern. It seems that the only argument presented was based merely on a disagreement with the specific Civil Service classification specification recommendations identified, and not on a thorough job analysis of these positions. The Auditor did not receive any additional position audit notes or job analysis documentation.

Pursuant to the Employer's request however, the Auditor again reviewed the position descriptions for the twenty-nine (29) positions identified as being of concern. As a result of this secondary review, the Auditor's recommendations have been modified to include additional Civil Service classification options for these positions. The Civil Service classification plan is designed to provide broad flexibility in this respect and must be utilized consistent with statutory requirements. The Employer may select a recommended classification listed in **Appendix A**, or an alternate Civil Service classification if the analysis of the position description more appropriately meets that criteria. However, our analysis still confirms that these positions should be classified as civil service appointments.

The Employer is reminded that a class specification is a general definition of a job class and is not intended to provide the level of specificity as a position description, but rather provide

broad information about the scope of work, general duties, and minimum qualifications. This framework provides the necessary flexibility to properly designate positions within the assigned classification plan and insure that vital human resource functions are fairly and equitably implemented and maintained. The Employer is also reminded that according to the Exemption Procedures Manual, ***“if a position description matches the specifications for any Civil Service classification, the position must be designated as Civil Service”***.

As discussed in the exit conference, the Employer is now required to utilize the Custom Classification designations and may transition positions to be reviewed into one of these classifications if appropriate. Additionally, the positions noted in this finding will be included in the Auditor’s review during the next audit period. *Again, it is strongly recommended that these positions be moved immediately, or at the next employment contract renewal date if applicable.*

***Note: “Custom Classifications” refer to the former Pilot Program designations of Accounting Associate, Human Resource Associate, Business/Administrative Associate, Information Technology Manager/Administrative Coordinator, Information Technology Technical Associate, and Information Technology Support Associate.***

**State Universities Civil Service System  
Western Illinois University  
FY2012 Biennial Compliance Audit**

**Appendix A**

***Principal Administrative Appointments  
Position Descriptions Matching Civil Service Specifications***

Employee Name	Title	Monthly Salary	Position Number	Recommended Civil Service Classification
Bradt, Kyle A.	Assistant Media Services Director	\$2,711.00	50126	Sports Information Director Series
Casteel, Dawn G.	Assistant Director, International Student Admissions	\$4,434.00	50132	Admissions and Records Series or Program Adviser
Coeur, Vivian J.	Health Education Specialist	\$3,768.00	50204	Health Education Coordinator or Medical Social Services Series
Cumbie, Diane M.	Assistant Director of Student Activities for Programming	\$3,291.00	50119	Assistant Program Director, Program Adviser or Program Coordinator Series
Eastman, Candace J.	Assistant Director of Development, WQPT	\$3,402.00	50397	Development Officer
Easton, Tyler C.	Admission Counselor	\$3,007.00	N/A	Admissions and Records Series or Program Adviser
Forman, Marlene S.	Assistant to Vice President/Provost	\$4,965.00	50011	University Budget Officer Series, Administrative Assistant Series, or Business/Administrative Associate
Foulk, Stephanie S.	Assistant Director, Development	\$3,161.00	50408	Radio Station Production Supervisor or Development Officer
Hankins, Chad W.	Research and Instructional Consultant	\$3,607.00	50401	Information Management Series, Microcomputer Support Specialist Series, Information Technology Technical Associate or Information Technology Support Associate
Hannen, Peter J.	Go West Transit Coordinator	\$3,535.00	50383	Program Coordinator Series
Howe, Michelle C.	Assistant Director of Career Services	\$2,837.00	50100	Program Coordinator Series or Program Adviser
Hudson, Rica R.	Assistant Director, Equal Opportunity and Access	\$4,630.00	50409	Equal Opportunity Officer Series
John, Brandon G.	Instructional Technology Systems Manager - Help Desk	\$2,958.00	50346	Microcomputer Support Specialist Series or Information Technology Support Associate
Johnson, Justine A.	Interpersonal Violence Prevention Coordinator	\$2,667.00	Unknown	Program Coordinator Series
Jones, Michael	Director of Development for Honors College, International Studies, and University Libraries	\$4,167.00	50358	Development Officer or Business/Administrative Associate
Katz, Nicholas B.	Assistant Director of Student Activities for Greek Life Programs	\$3,366.00	50120	Assistant Program Director, Program Adviser, or Program Coordinator Series
Lange, Jamie L.	Director of Development, WQPT	\$4,061.00	50396	Development Officer
Lankford, Chad E.	Research and Instructional Consultant (Support Technician)	\$2,632.00	50319	Instructional Media Systems Series, Information Technology Management Series, Information Technology Technical Associate, or Information Technology Support Associate
Lutz, Anthony J.	Assistant Director of Marketing and Communications, Housing & Dining Svcs.	\$3,834.00	50413	Public Information Series or Publicity-Promotion Specialist
Lytle, Sara M.	Supervision Field Specialist	\$3,220.00	50364	Graduate Placement Officer
McDonough, Sean	Assistant Director of Athletics for Development	\$5,068.00	50096	Development Officer

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**Appendix A**

***Principal Administrative Appointments  
Position Descriptions Matching Civil Service Specifications***

Employee Name	Title	Monthly Salary	Position Number	Recommended Civil Service Classification
Menifee, Delorean J.	Admission Counselor	\$3,333.00	N/A	Admissions and Records Series or Program Adviser
Morgan, Charles K.	Assistant Director	\$5,387.00	50402	Information Technology Management Series or Information Technology Technical Associate
Mueller, Jessica L.	Assistant Director of Student Judicial Programs	\$2,837.00	50414	Student Judicial Advisor
Musick, Micheal	Cultural Events Coordinator	\$4,791.00	50117	Program Coordinator, Program Adviser or Special Events Facilitator
Null, Catherine R.	Assistant to the Dean of Fine Arts and Communication	\$5,141.00	50309	Publicity-Promotion Specialist or Special Events Facilitator
Oleson-Tracey, Kathy	Instructional Technology Systems Manager - Resource Assistant	\$2,987.00	50349	Instructional Media Systems Series, Information Technology Management Series, Information Technology Technical Associate, or Information Technology Support Associate
Pedigo, Clinton W.	Microsoft Server, Desktop, and Security Specialist	\$5,050.00	50289	Information Technology Management Series or Information Technology Technical Associate
Reynolds, Christie S.	Counselor	\$3,968.00	50398	Mental Health Counselor Series or Medical Social Services Series
Schmidt, Sonja E.	Health Education Specialist	\$3,335.00	50237	Health Education Coordinator or Medical Social Services Series
Severs, Ryan B.	Instructional Technology Systems Manager	\$2,503.00	50085	Video Post-Production Supervisor or Video Production Assistant
Sheridan, Timothy P.	Director of Student Judicial Programs	\$5,917.00	50072	Director of Student Judicial Programs
Sikes, Kimberly N.	Associate Director, Center for the Application of Information Technology	\$6,537.00	50320	Information Technology Manager/Administrative Coordinator of Information Technology Management Series
Smith, John W.	Assistant Director	\$4,477.00	50315	Assistant Director of Clinical Support Operations
Sundaram, Ramesh K.	Microsoft Server, Desktop, and Security Specialist	\$5,050.00	50342	Information Technology Management Series or Information Technology Technical Associate
Thompson, Michael R.	Associate Director for Television	\$4,663.00	50092	Television Director-Producer
Tingley, Larry G.	Assistant Director of Admissions Processing	\$3,861.00	50093	Admissions and Records Series
Van Sloten, Dustin	Assistant Director	\$3,876.00	50099	Intramural and Recreation Coordinator
Williams, Curtis M.	Assistant Director, Quad Cities Admissions	\$4,622.00	50121	Admissions and Records Series or Program Adviser
Wochner, Shawn M.	Admission Counselor	\$3,415.00	N/A	Admissions and Records Series or Program Adviser