

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*

October 1, 2020

Ms. Zaldwaynaka "Z" Scott
President
Chicago State University

Ms. Lindsay Hamilton
Chief Culture and Talent Officer
Designated Employer Representative
Chicago State University

Ms. Natalie Covello
Chief Internal Auditor
Chicago State University

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

Ms. Andrea Zopp
Merit Board Representative
State Universities Civil Service System

The State Universities Civil Service System submits the outcome of the FY2020 Governance, Risk, and Compliance Audit of the Office of Human Resources at Chicago State University, covering the period of **November 1, 2014 – October 31, 2019**. This report communicates the overall assessment of human resource practices during that period, documents risk assessment category findings and provides recommendations to rectify compliance issues discovered through this comprehensive human resource operational audit.

As you will observe in this Final Audit Report, there are fifteen (15) individual audit findings presented. The result of this compliance audit at Chicago State University is indeed serious and of significant concern. A consistent theme with many of these findings was the lack of conceptual understanding regarding many of the principles outlined in the State Universities Civil Service Act (Act) (110 ILCS 70/36b(3)), as well as insufficient record-keeping processes and documentation needed to verify basic civil service employment transactions. These deficiencies undoubtedly hindered the Employer's efforts to effectively implement personnel actions; in particular, the employment of candidates through the register referral process, the accurate calculation of seniority, and the proper administration of reemployment rights.

Compliance audits are retrospective, so when compliance issues are discovered at any of our employment locations, the University System, in its regulatory capacity, must fulfill its obligation to appropriately

document and report audit findings. However, the University System is also charged with serving in a consultative capacity with HR professionals and campus administrators to build strategic partnerships, evaluate processes and performance, provide direct guidance and support services, and implement flexibilities that meet the needs of each Employer consistent with regulatory requirements. This approach to compliance is best articulated in the Audit Charter, approved by the Merit Board in August 2016.

In this respect, it is important to note that during the audit period of **November 1, 2014 – October 31, 2019**, Chicago State University was experiencing significant administrative level personnel changes. A new President and Director of Human Resources were appointed; and further, most of the Board of Trustee members currently serving were appointed toward the end of the audit period. Despite these challenges, President Z. Scott, former Board of Trustee Member Miriam Mobley-Smith, and now current Chicago State University Board of Trustee Chair, Andrea Zopp, have each conveyed to our office, their commitment to ensuring that current audit findings are remedied and that future compliance will be achieved. In this respect, the University opted to take additional measures in response to the findings and formulate a plan going forward.

Consistent with Section 250.140(b) of the Illinois Administrative Code, it states that “The Executive Director is authorized to delegate to the Employer, and to members of the University System staff, such duties and responsibilities as, in his/her judgment, are appropriate and effective for the efficient administration of the service of the System to its constituent institutions and agencies.” This delegation of authority is provided by the Executive Director to the Designated Employer Representative (DER) at Chicago State University, along with other places of employment as previously noted. At the time this Final Audit Report is published, the Executive Director of the University System is suspending delegated authority to the Designated Employer Representative (DER) at Chicago State University in three human resource areas. These areas include aspects of the employment process, exemptions from the Act, and the use of Extra Help appointments. The specific restrictions related to these areas will be provided under separate cover to the Employer and the administration. This suspension of delegated authority will continue until such time as training is completed and the Human Resource Office can successfully operate in compliance with regulatory requirements on an on-going and consistent basis. In this respect, the University System will oversee some of the operational aspects of the employment process while also ensuring that a consistent level of compliance is adequately maintained.

It should be understood that the suspension of delegated authority from the DER at Chicago State University is not a punitive measure. In conjunction with providing training, listed below, the University System intends to utilize suspension of authority as an additional approach to ensuring compliance going forward. Rather than permitting the university to make potential errors without oversight in preparation for the next audit, the University System contends that removing delegated authority temporarily is warranted in this instance. The University System believes that this formalized oversight is necessary and that the temporary removal of delegated authority will allow Chicago State University to more quickly return to full compliance with the Act and Code. Consistent with this premise, the University System will, in addition to in-depth training, engage in weekly meetings with CSU HR Staff in order to normalize communication with our office when issues arise that could impact Civil Service employees on campus.

Upon receipt of the Draft Audit Report, issued on May 13, 2020, Chicago State University retained outside counsel, Ms. Heather Becker of Laner Muchin, Ltd., to facilitate a response to the audit, correct problems, develop processes, implement a schedule for meeting task objectives, and seek assistance from the University System concerning training and development for human resource staff. This context is important to consider when weighing the outcomes of each finding with the significant measures taken

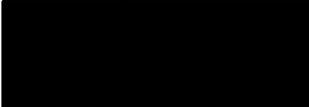
at this point to correct deficiencies and ensure future compliance. Therefore, as the University System outlines the root causation of each finding within this report, it should be noted that proactive steps have already been taken to establish open channels of communication, educate and further develop HR staff on campus, and implement tools that ensure compliance in preparation for the next audit scheduled in November 2021.

To that end, and to assist Chicago State University with compliance with the Act and Administrative Rules (Rules), Ill. Adm. Code Part 250, and to prepare adequately for the next audit, the University System is currently developing and presenting training modules for the CSU HR staff. The following training module topics have been identified and are currently being developed and implemented into the Chicago State University HR Staff development plan:

Module 1:	Civil Service 101: The Basic Concepts	September 10, 2020
Module 2:	Register Management and Maintenance	Conducted July 29, 2020
Module 3:	Position Description Development and Maintenance	Scheduled October 7, 2020
Module 4:	Documenting Employment Transactions	TBD
Module 5:	Compensation and Pay Administration	TBD
Module 6:	Examinations and Security of Test Instruments	TBD
Module 7:	Non-Status Appointments and Other Transactions	TBD
Module 8:	Exemption Determination and Accountability	TBD

The University System is committed to this educational and process improvement approach to achieve and maintain future compliance by developing training programs that connect the concepts in a manner that focuses on cause and effect. This approach is especially necessary given the ever-changing employment demands and challenges ahead that all of our constituent employers will face as we continue to maneuver through business operations in the midst of a global pandemic. It is our hope and expectation that Chicago State University remains engaged moving forward, and as long as that continues, the University System will take the lead in assisting Chicago State University become compliant with the Act, Code, and Procedures in preparation for the next audit and lay the groundwork for compliance in future audits.

Please note that all final audit reports are published at the University System website once they are issued. On behalf of the Legal and Compliance Services Division, please convey our appreciation to the human resources staff for engaging in the audit process and expressing their commitment to addressing the findings. If there are any questions or a personal briefing on any item is desired, please contact Gail Schiesser, Legal Counsel, Legal and Compliance Services Manager and/or Lucinda M. Neitzel, Assistant Director of Legal and Compliance Services at (217) 305-6604.



Jeff Brownfield
Executive Director

STATE UNIVERSITIES CIVIL SERVICE SYSTEM

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*Julie Annette Jones
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October 1, 2020

Ms. Lindsay Hamilton, Esq.
Chief Culture and Talent Officer
Designated Employer Representative (DER)
Chicago State University
9501 South King Drive, ADM 203
Chicago, IL 60628-1598

Dear Lindsay:

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.

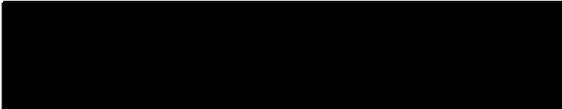
This communication serves to formally outline these regulatory requirements and to further demonstrate our commitment to transparency with respect to the FY2020 Governance, Risk, and Compliance Audit for Chicago State University. Prior to the on-site visit, your office was provided with the Audit Charter, 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, an on-site evaluation

conducted January 21-24, and an additional follow-up visit required on February 5, 2020. The Auditor provided you with a Preliminary Observation Report and engaged in a post-audit conference on February 7, 2020, which outlined specific follow up items and additional documentation requirements that your office was instructed to complete. A Draft Audit Report was issued on May 13, 2020, with a formal Exit Conference conducted on June 8, 2020. During the formal Exit Conference, your office staff stated their understanding of the audit scope, risk assessments, the draft audit report and its contents, engaged in several follow-up activities, 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.



Gail Schiesser
Legal Services Manager and Legal Counsel

STATE UNIVERSITIES CIVIL SERVICE SYSTEM



Governance, Risk and Compliance Audit Report (Final)

October 1, 2020

CHICAGO STATE UNIVERSITY

Audit Time Frame:
November 1, 2014 – October 31, 2019

On-Site Visit:
January 21-24, 2020 and February 5, 2020

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
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 concerning 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 the 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 Chicago State University included a comprehensive evaluation of employment designations and/or category of status, non-status, and exempt appointments, position audits and description review for Civil Service and Exempt appointments; compensation rates/ranges; admission of applicants to examinations and register referrals/maintenance; compliance with the Extra Help 900-hour limitation and time frame requirements for Temporary Upgrade Assignments; Civil Service transactional documentation reviews; 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 Chicago State 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, Layoff Transactions, Specialty Factor Designations, 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.**

Chicago State University
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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>
Category 1 Findings	14
Category 2 Findings	1
Repeated findings from previous audit®	3

REPORT SCHEDULE OF AUDIT FINDINGS

<u>Item Number</u>	<u>Page</u>	<u>Description</u>
<u>RISK ASSESSMENT CATEGORY 1 FINDINGS</u>		
CSU FY20-01	6	Deficiencies in Maintaining Reemployment Registers
CSU FY20-02	13	Deficiencies in Basic Records Management and Business Processes®
CSU FY20-03	18	Unauthorized Compensation Overrides Paid to Civil Service Employees
CSU FY20-04	25	Exemption Authorization Applied to Positions that Correspond to Civil Service Classification Specifications®
CSU FY20-05	30	Non-Compliance with Open and Continuous Testing Program
CSU FY20-06	36	Non-Compliance with Security of Examination Materials
CSU FY20-07	40	Non-Compliance with Extra Help Employment and Position Limitation®
CSU FY20-08	44	Employees Paid Outside of Approved Salary Ranges
CSU FY20-09	46	Non-Compliance with Triennial Review of Exempt Position Descriptions
CSU FY20-10	52	Non-Compliance with Cyclic Review Standards for Civil Service Position Descriptions
CSU FY20-11	56	Identification of Errors in Payroll and HRIS Systems
CSU FY20-12	60	Erroneous Practices Related to Permissive Removal of Names from Registers

<u>Item Number</u>	<u>Page</u>	<u>Description</u>
		<u>RISK ASSESSMENT CATEGORY 1 FINDINGS</u>
CSU FY20-13	65	Failure to Confirm Validity of Assigned and Approved Specialty Factors
CSU FY20-14	68	Non-Compliance with Auditor Request to Conduct Civil Service Employee Desk Audit
		<u>RISK ASSESSMENT CATEGORY 2 FINDING</u>
CSU FY20-15	72	Inaccurate Exemption Authorization Applied

Chicago State University
Final Audit Report

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

CSU FY20-01 DEFICIENCIES IN MAINTAINING REEMPLOYMENT REGISTERS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36b(2); and*
- 2) *Illinois Administrative Code (Code), Section 250.140 Delegation of Authority and Responsibilities, and*
- 3) *Illinois Administrative Code (Code), Section 260.60 Eligible Registers and*
- 4) *Employment and Separation Procedures, Section 1.4 Establishment of Registers, Maintenance of Registers, and Certification from Registers.*

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

As stated in Section 250.140 of the Code, “Delegation of Authority and Responsibilities”:

- a) “Delegation to the Executive Director. The Executive Director is delegated the authority and responsibility to effectively administer the State Universities Civil Service System in accordance with the Act and this Part. The Executive Director may be further delegated the authority and responsibility to act on behalf of the Merit Board by specific authorization or direction of the Merit Board.”
- b) “Delegation by the Executive Director. The Executive Director is authorized to delegate to the employer, and to members of the University System staff, such duties and responsibilities as, in his/her judgment, are appropriate and effective for the efficient administration of the service of the System to its constituent institutions and agencies.”
- c) “Conduct of Audits. The Executive Director shall conduct ongoing audit programs of all Civil Service operations at all places of employment for the purpose of assuring compliance with the Act and this Part and for improving the programs of personnel administration of its constituent employers and shall prepare, distribute, and follow up on audit reports in accordance with Merit Board direction.”

In this respect, the Governance, Risk, and Compliance Audit of University System employers will include, but not be limited to:

- A 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

Accurate maintenance and proper use of registers are a fundamental requirement and an essential element in the standardized civil service employment process. This responsibility has been delegated to the DER and is reviewed through the audit process. All register maintenance components are required to be documented and maintained in order to validate employment activities. Specific electronic register maintenance components are required to be maintained in the electronic E-test System.

Certification is the act of referring candidates from a register for consideration for employment when a vacancy occurs and the date of certification is established (closing of the registers).

- a. Candidates on the Reemployment register, one at a time, shall be referred first and offered employment on the basis of seniority.
- b. Once the Reemployment register has been processed, the Promotional register shall be processed and then the Original Entry register.
- c. In the absence of a Reemployment register, an employing department shall have the choice of the candidates possessing the top three available scores.

BACKGROUND/CONTEXT:

As with any audit, source documents are required as evidence that specific employment transactions occurred and necessary to demonstrate compliance. Section 250.140 of the Illinois Administrative Code provides the authority and jurisdiction for the University System to conduct and implement specific processes for the conduct of the Governance, Risk, and Compliance Audit.

General record-keeping standards are evaluated as an overall observation in relation to other business processes that directly impact the Civil Service employment environment and are reviewed under the purview of a Category 1 Risk Assessment. These vital record-keeping standards are fundamental to any employment process and have a direct impact on the Auditor's ability to adequately perform compliance activities. As a practical matter, this category of importance indicates that the topic is audited for compliance during every cycle at each Employer location.

CONDITIONS/FACTS:

Upon receipt of the Draft Audit Report, which was issued May 13, 2020, the Employer's legal representative contacted the Auditor to discuss the specifics of the audit, communicate the commitment from the university in addressing the audit findings, obtain clarity regarding next steps in the audit process, and extend the due date for submission of the Employer's Administrative Response. The Auditor recommended that the Employer request a Formal Exit Conference to review each of the findings pursuant to standard audit processes.

This Formal Exit Conference occurred on June 8, 2020. During the conference, the Auditor reviewed and explained each finding listed in the Draft Audit Report. With respect to the finding entitled “Noncompliance With Open and Continuous Testing Provisions” (which is referenced later in this report), the Employer expressed questions about developing an ongoing testing program since Chicago State University still had former employees on layoff. In response to this question, the Auditor initiated a follow-up request for any documentation of reemployment registers for former employees who had been laid off during the audit period.

The Employer submitted the reemployment register documentation to the Auditor on June 11, 2020. The Auditor then compared the reemployment register submitted to the list of new hires provided at the beginning of the audit and prior to the on-site visit. The following is a summary of deficiencies discovered by the Auditor that required immediate correction by the Employer:

1. Errors in classification assignment resulting from changes-in-title requirements effective May 1, 2019 in the Clerk and Office Support series classifications;
 - a. Errors in seniority calculations, both in total by classification and by the method of calculation, resulting in additional errors in how former employees were ranked on the register;
 - b. Errors in accounting for leaves of absence, disability, and disciplinary suspensions in the calculation of seniority, resulting in inaccurate seniority calculations and rankings;
 - c. Errors in layoff dates in eleven of sixteen instances – May 1, 2005, versus May 1, 2015, resulting in additional inaccuracies regarding seniority calculations and rankings;
 - d. Errors in the employment of new candidates in entry-level classifications within the Office Support Series when there were former employees on the reemployment register with seniority, at levels higher in the promotional line, who were not contacted for recall;
2. Former employees listed on the reemployment register that had otherwise previously resigned or retired (██████████);
3. When requested by the Auditor, the Employer was unable to find substantiating documentation to support employment decisions (evidence of former employee contacts, responses, etc.), or properly manage the reemployment register when vacancies occurred;

Upon notification of these errors, the Auditor scheduled an immediate conference with the Employer in an attempt to determine the impact of these inaccuracies; specifically, which former employees were denied their seniority rights, and which current employees, if any, had been employed in error. In order to maneuver through the complexity of managing the reemployment register in this regard, the Auditor provided the Employer with a series of questions that requested documentation in supporting employment decisions consistent with requirements in the Act and Code. Further, the Employer was instructed to correct the reemployment register and adjust seniority calculations as appropriate.

Following the Employer’s responses to these questions, the Auditor reviewed the Office Support Series reemployment register with the DER and outside counsel on July 13, 2020. It was during this initial

meeting that the Auditor explained the evolution of the reemployment register, describing how classification changes impact the seniority of former employees on the register, as well as the order of precedence in which callbacks should have occurred before new employees were placed into positions.

CAUSE/SOURCE OF CONDITION:

Employment records and associated personnel transactions related to reemployment registers for former employees with seniority rights listed on those registers were not properly maintained or documented. In some instances, the Employer was unable to demonstrate that former employees who had been laid off were contacted when employment opportunities in their classifications became available in the months/years following their layoff. In two instances, there were employees on the reemployment register that had otherwise retired or separated voluntarily from the university and should have been removed.

With several classifications being utilized as Extra Help and exceeding the 900-hour limitation in several instances, as referenced later in this report, it is inconceivable that there would not be any consideration for former employees on layoff with employment rights to status positions given the apparent need for them. The reemployment register submitted to the Auditor contained outdated classifications, specifically in the Clerk and Office Support Series that were merged on May 1, 2019, which would have required the seniority calculations for employees in those classifications to be updated and revised, with notification provided to the former employee impacted.

EFFECT/IMPACT:

The failure to establish and maintain a sound program of personnel administration concerning Civil Service employment has significant consequences and increased liability risk for the Employer. The Employer was unable to demonstrate the validity of their overall employment process or verify the employment register for both the sampled list of new employees (referenced in a finding later in this report) and those former employees with seniority rights listed on the reemployment register.

Without the ability to prove whether former employees listed on the reemployment register were offered positions eventually given to new hires, it is highly likely that they were merely bypassed, resulting in new hires with lower seniority being employed into status positions when formerly laid off employees listed on the reemployment register with more seniority were not given their basic and fundamental statutory rights. In this respect, the liability risk for the Employer is significant; to the extent that without documentation to the contrary, positions will need to be created and offered to those individuals who were denied their seniority rights in accordance with the Act.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION(S) TO THE EMPLOYER:

Consistent with other finding recommendations noted in this report, the Employer must immediately implement practices and procedures that strictly adhere to proper employment records maintained in accordance with basic statutory requirements. The inability to provide supporting documentation that demonstrates the intent and action of former employees who were laid off from their positions and subject to call back is a significant violation of the Act.

Due to the severity of this finding, the Employer is required to make corrections to the reemployment register and submit the documentation to the Auditor for review to ensure that former employees laid off from their positions are properly captured with their corrected seniority ranking by classification and classification series. Former employees listed on the reemployment register are given three opportunities to accept a Civil Service status position in either the classification from which they were laid off from; and/or at a lower level in the classification series in which accumulated seniority is rightfully theirs. If any formerly laid off employee is removed from the reemployment register, the rationale must be explained in the administrative response. If a former employee either requests, or agrees to, removal from the reemployment register, the Employer must provide formal notification to the individual (even if removal is at the former employee's request) and the action must be documented and submitted to the Auditor.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

Please know that Chicago State University is committed to complying with the State Universities Civil Service System rules, policies and procedures. As we discussed during the Formal Exit Conference, this is one of the areas where our employees whose job duties involve maintenance of the reemployment registers would benefit from training provided by your team so that we can make all necessary corrections to the current reemployment register and ensure that proper policies and procedures are in place so that future errors are prevented and recordkeeping is proper and complete going forward.

The following employees would be part of that training: (1) Lindsay Hamilton; (2) Abbie Miles; (3) Charlie Grijalva; (4) Arbria Lee; (5) Lyla Rowe-Anderson; and (6) Heather Scott.

For each specific request from the Auditor, the Employer's responses are as follows:

1. [REDACTED] effective hire date for the full-time status position of Building Service Worker is January 18, 2011. Attached is a copy of his original offer letter, which confirms his start date of employment. *****The Employer provided the Auditor with a copy of the Banner entry which confirms [REDACTED] start date within the CSU system as January 18, 2011.***
2. [REDACTED] has been removed from the reemployment register. [REDACTED] retired effective May 1, 2010. *****The Employer provided the Auditor with a copy of the SURS documentation confirming [REDACTED] retirement.***
3. For positions requiring specialty factors, the Employer provided screenshots which include electronic time stamp proof from PeopleAdmin (CSU's position management system) that the specialty factor for the position exists in the position control record and within the job description.
4. [REDACTED] has been removed from the reemployment register. *****The Employer attached a copy of the SURS documentation indicating [REDACTED] termination/separation from employment.***
5. After reviewing [REDACTED] employment file and researching electronic communication, the University was unable to locate evidence that [REDACTED] was or was not offered appointment prior to new hires being made within the Office Support Series classifications.

6. The task of Reconstruction of the Office Support Series Reemployment Register will be completed no later than July 10, 2020 as requested by the Auditor.
7. The University will review the reemployment register to fill extra help vacancies prior to offering the position to an employee not on the register. The University will document the declination of offers of extra help. The University will routinely review the use of extra help and direct departments to fill permanent status positions for job duties previously conducted by extra help employees (as deemed appropriate).

The University will complete a review of all classification revisions since August 1990 and provide an updated seniority list. Given the magnitude of this review and the magnitude of deficiencies previously cited, the University was unable to comply with a deadline of June 17, 2020. The University is requesting a deadline of **September 1, 2020**, in order to ensure that the information is accurate and thoroughly reviewed by multiple levels of the Human Resources department. This will guarantee that the information is thorough and complete. The University is highly committed to having accurate employment records and documentation of personnel transactions.

The Office of Human Resources has the upmost intent on fully complying with State Universities Civil Service System rules, policies and procedures. CSU's Office of Human Resources looks forward to working with the State Universities Civil Service System to correct deficiencies and develop efficient, sustainable internal processes and procedures that will ensure compliance.

Auditor's Note: *Following the training conducted on July 29, 2020, the Employer submitted additional information that better clarifies information contained on the Office Support Series reemployment register:*

- *CSU hired three employees into the Office Administrator classification which is the highest classification in the series, therefore, it did not violate any bumping rights of any employees currently on the layoff register. We provided a resignation letter for [REDACTED].*
- *There was a final-status notice sent out on February 12, 2019. This resulted in a Change in Title for 3 employees: [REDACTED] (Chief Clerk to Office Support Specialist), [REDACTED] (Clerk to Office Support Associate), and [REDACTED] (Chief Clerk to Office Support Specialist). These three individuals have been added to the corresponding reemployment register.*
- *[REDACTED] (Office Support Assistant) was terminated during her probationary period. (Start Date 8/6/2018 - Term Date 11/30/2018)*

Moving forward, the employees on the Office Support Associate and Office Support Specialist reemployment registers shall be offered employment in any open, available positions in the Office Support Assistant classification based upon seniority, before hiring a new employee into that classification.

ADDITIONAL AUDITOR COMMENTS:

Due to the intricate aspects of this overall topic, further complicated by the lack of consistent records and documents, the Auditor was unable to conclusively determine whether the Act, Code, or Procedures were correctly followed during the audit period. The Employer is still conducting their review of the overall

topic, especially concerning former employees on the reemployment register in classifications other than the Office Support Series. If it is determined that former employees exist on any reemployment register with more seniority than current status employees occupying any Civil Service status positions, the Employer will be required to provide offers of employment to those on the reemployment register who were bypassed.

Overall, the University System remains concerned that adequate source documentation has not been maintained for each former employee, or that seniority has been calculated consistently across the board. The Auditor will again follow up with the Employer to ensure former employee rights have been properly administered and documented. As a result, the University System is suspending the authority of the Designated Employer Representative (DER) at CSU regarding this topic, and requests the Employer provide the updated and corrected reemployment register for ALL classifications. Given that layoffs have occurred within the last two months, this level of accountability is not only critical, but will ensure that former employee rights are protected.

In addition to the previous recommendations noted above, the University System is committed to providing concurrent training module sessions for HR Staff regarding several topics consistent with each step in the Civil Service employment process, including but not limited to, the designation of positions, maintenance of reemployment registers, calculation of seniority, and the recording of personnel transactions.

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CSU FY20-02 DEFICIENCIES IN BASIC RECORDS MANAGEMENT AND BUSINESS PROCESSES

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36b(2); and*
- 2) *Illinois Administrative Code (Code), Section 250.140 Delegation of Authority and Responsibilities, and*
- 3) *Illinois Administrative Code (Code), Section 260.60 Eligible Registers.*

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

As stated in Section 250.140 of the Code, “Delegation of Authority and Responsibilities”:

- a) “Delegation to the Executive Director. The Executive Director is delegated the authority and responsibility to effectively administer the State Universities Civil Service System in accordance with the Act and this Part. The Executive Director may be further delegated the authority and responsibility to act on behalf of the Merit Board by specific authorization or direction of the Merit Board.”
- b) “Delegation by the Executive Director. The Executive Director is authorized to delegate to the employer, and to members of the University System staff, such duties and responsibilities as, in his/her judgment, are appropriate and effective for the efficient administration of the service of the System to its constituent institutions and agencies.”
- c) “Conduct of Audits. The Executive Director shall conduct ongoing audit programs of all Civil Service operations at all places of employment for the purpose of assuring compliance with the Act and this Part and for improving the programs of personnel administration of its constituent employers and shall prepare, distribute, and follow up on audit reports in accordance with Merit Board direction.”

In this respect, the Governance, Risk, and Compliance Audit of University System employers will include, but not be limited to:

- A 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

BACKGROUND/CONTEXT:

As with any audit, source documents are required as evidence that specific employment transactions occurred and necessary to demonstrate compliance. Section 250.140 of the Illinois Administrative Code provides the authority and jurisdiction for the University System to conduct and implement specific processes for the conduct of the Governance, Risk, and Compliance Audit.

General record-keeping standards are evaluated as an overall observation in relation to other business processes that directly impact the Civil Service employment environment and are reviewed under the purview of a Category 1 Risk Assessment. These vital record-keeping standards are fundamental to any employment process and have a direct impact on the Auditor’s ability to adequately perform compliance activities. As a practical matter, this category of importance indicates that the topic is audited for compliance during every cycle at each Employer location.

CONDITIONS/FACTS:

Consistent with standard audit protocols for this FY2020 Governance, Risk, and Compliance Audit, a sample of employee personnel records were requested for review during the on-site portion of the audit. The purpose of this review is to determine whether the employment protocols utilized by the Employer are adequate to ensure compliance with the Act, Code, and System Procedures. Further, the Auditor must evaluate whether the Employer has established a sound program of personnel administration.

The Auditor requested a sample review of **eighteen (18)** personnel records for employees appointed within the audit time frame, and **six (6)** additional personnel records for employees reclassified from other classifications. In general, employment records and associated documents were either incomplete or simply did not exist. In this respect, the following discrepancies were noted:

- The Employer was unable to locate the employment registers for **twelve (12)** new employees appointed during the audit time frame. **(66%)** As a result, the Auditor was unable to confirm in each instance whether the proper candidates, consistent with statutory provisions regarding the ‘Rule of Three’, were referred to departments for an interview at specific points in time. These records included:

██████████	Program/Student Advisor
██████████	Office Administrator
██████████	Program Assistant
██████████	Office Support Assistant
██████████	Grounds Worker
██████████	Events Administrator
██████████	Properties Technician
██████████	Accounting Associate
██████████	Budget Analyst I
██████████	Program Assistant

██████████ Assistant Payroll Manager
██████████ Graphic Designer

- In addition to the inability to produce employment registers as noted above, the Employer was unable to provide or verify examination dates and/or examination scoring information for the following **five (5)** employees in the identified classifications below:

██████████ Parking Services Agent I
██████████ Properties Technician
██████████ Accounting Associate
██████████ Budget Analyst I
██████████ Program Assistant

- Of the **six (6)** reclassification/reallocation transactions reported by the Employer and required for audit review invalidating the 30-day timeliness completion standard, the Employer was unable to provide the date the desk audit was requested, when the position description was given to Human Resources, and could not locate desk audit notes and/or examination scoring information for the following **five (5)** employees:

██████████ Admissions and Records Specialist I to Graduate School Specialist
██████████ Human Resource Assistant to Benefits Officer
██████████ Mail Messenger to Distribution Clerk
██████████ Distribution Clerk to Assistant Distribution Services Supervisor
██████████ Budget Technician Specialist to Budget Analyst II

- Of the **eighteen (18)** new employee personnel records reviewed, the Auditor was unable to locate the probationary evaluations of **ten (10)** employees.
- Of the **two (2)** new employees awarded veteran's preference points, the Employer was unable to locate or provide the source documentation to justify the addition of points to the examination score for **one (1)** employee, ██████████.

CAUSE/SOURCE OF CONDITION:

Employment records and their associated personnel actions were not properly established, maintained, or documented. In the majority of the sample, Civil Service employment records and documentation is either significantly inadequate or simply unavailable.

EFFECT/IMPACT:

The failure to establish and maintain a sound program of personnel administration concerning Civil Service employment has significant consequences and increased liability risk for the Employer. The Employer was unable to demonstrate the validity of their overall employment process or verify the employment registers for the sampled list of new employees. These poor record-keeping practices resulted in the inability to demonstrate whether candidates were properly referred and/or employed within fundamental statutory requirements.

FINDING(S) FROM PREVIOUS AUDIT(S):

During the FY2013 Biennial Compliance Audit, the Auditor requested the review of **thirty-six (36)** personnel records for those employees hired within the audit time frame, and **three (3)** additional personnel records for employees reallocated from other classifications. At the time of the previous audit, generally speaking, the employment records and associated documents were either incomplete or simply non-existent. [*Finding Code CSU FY13-01, pages 4-7*].

RECOMMENDATION(S) TO THE EMPLOYER:

The Employer needs to immediately implement practices and procedures that strictly adhere to proper employment records maintenance to ensure that all candidates have completed the required examination and have been properly referred and/or employed in accordance with basic statutory requirements. The inability to provide supporting documentation that demonstrates how candidates are referred to departments on the date an employment register was frozen, or provide validation of examination information and veteran's preference points, or demonstrate the final step in the examination process through documented probationary evaluation information is clearly inadequate and fails to demonstrate compliance.

The Employer's records must be properly maintained to validate statutory compliance in every employment and examination action taken.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. As discussed during the Audit Exit Conference, the University requests training for its designated team members from the State Universities Civil Service System ("SUCSS") on proper file maintenance, including training in the areas of:

- Managing the Reemployment Register
- The differences between the three types of registers
- What fields should be added to the Office of Human Resources' tracking spreadsheets
- Proper documentation for the close out file
- Evaluating the credentials to test
- Managing the Rule of 3 process
- Documenting the referral process
- Quarterly reporting requirements
- Reclassification documentation

In accordance with the Auditor's proposed recommendation, CSU has no objection to submitting employment registers to the Auditor for review for a designated period.

ADDITIONAL AUDITOR COMMENTS:

The Employer needs to revise or correct the systemic issues that resulted in this finding. The University System remains concerned that, as an overall topic, adequate source documentation has not been properly maintained; whether it is related to register referrals, desk audit notes, veteran's documentation, etc. As a result, the University System is suspending the authority of the Designated

Employer Representative (DER) at CSU regarding this topic until such time as delegated authority is returned to the DER. Additionally, the University System will provide instruction as to the documentation that must be maintained to validate each employment transaction.

In addition to the previous recommendations noted above, the University System is committed to providing concurrent training module sessions for HR Staff regarding several topics consistent with each step in the Civil Service employment process, including but not limited to, the designation of positions, maintenance of reemployment registers, calculation of seniority, and the recording of personnel transactions.

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Recommendation, Administrative Response, and Additional Auditor Comments

CSU FY20-03 UNAUTHORIZED COMPENSATION OVERRIDES PAID TO CIVIL SERVICE EMPLOYEES

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.100 Reassignments and Transfers; and*
- 3) *Employment and Separation Procedures Manual, Section 4.2 Temporary Downgrading and Upgrading Assignments; and*
- 4) *Pay Administration Procedures Manual, Section 1.1 Introduction.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(1) To approve a classification plan prepared under its direction, assigning to each class positions of substantially similar duties. The Merit Board shall have power to delegate to its Executive Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.

(2) To prescribe the duties of each class of positions and the qualifications required by employment in that class.

(3) To prescribe the range of compensation for each class or to fix a single rate of compensation for employees in a particular class; and to establish other conditions of employment which an employer and employee representatives have agreed upon as fair and equitable. The Merit Board shall direct the payment of the "prevailing rate of wages" in those classifications in which, on January 1, 1952, any employer is paying such prevailing rate and in such other classes as the Merit Board may thereafter determine. "Prevailing rate of wages" as used herein shall be the wages paid generally in the locality in which the work is being performed to employees engaged in work of a similar character.

As a matter of operating policy, the Merit Board has historically interpreted Section 36d(3) of the State Universities Civil Service Act (Act) to require the payment of wages to all employees which are generally comparable to the wages paid in the locality, or recruiting area, to employees engaged in work of a similar character. *Prior to implementation by an employer, all rates or ranges must be submitted to the University System Office, with substantiation, for approval.*

(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.

The Employment and Separation Procedures Manual, Section 4.2 refers to transactions known as Temporary Upgrades, and 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." 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."

BACKGROUND/CONTEXT:

Compensation for Civil Service employees are typically reviewed and analyzed as a Category 3 Risk Assessment to ensure that employees are paid within the range established by the Employer and approved by the University System. Employees found to be paid outside of the range may indicate that the Employer has not updated ranges within the Salary Data System or properly maintained appropriate salary levels among its employees. Standard audit procedures used by the University System is to request that pay rates and ranges be updated and corrected relatively easily so that they do not have a significant impact on employees, unless there are rates paid below the range minimum. Typically, Employers simply need to adjust or update ranges consistent with other variables, such as updates to collective bargaining agreements or range compression at the maximums due to employee longevity.

To ensure that employees are fairly and equitably compensated for performing or engaging in work of similar character, this topic is routinely audited during every cycle at each Employer location. While the Employer sets compensation based on their discretion, the topic is subject to review by the University System, and in instances where employees are paid below the range minimum, retroactive pay for those employees impacted may be necessary. Other fluctuations in compensation could be attributed to reclassification or reallocation actions, employees working in intern appointments, temporary upgrade assignments, temporary exempt appointment (PAA) duties, or stipends for performing different work in a separate appointment. Each of these personnel transactions are reviewed separately by the Auditor under a Category 1 Risk Assessment; therefore, issues that arise in any of these other areas are cited separately depending on the severity of non-compliance.

CONDITIONS/FACTS (PART 1):

The Civil Service classification plan contains hundreds of specifications that capture duties and responsibilities at various levels. Each classification specification consists of a function summary, a list of duties typically performed in that class, minimum acceptable qualifications required for appointment in the class, and knowledge, skills, and abilities needed for satisfactory performance within the class. Many classifications consist of more than one level; where the minimum acceptable qualifications often indicate that employees assigned to higher level classifications within a series are expected to, when necessary, perform the functions and duties of lower level classifications. Additional duties may be assigned at the same or lower classification that would be considered inherent to an employee's classification.

Conversely, the Act/Code/Procedures authorizes and contains rules that govern the manner in which Civil Service employees are compensated for performing duties at higher levels inside or outside of an employee's assigned promotional line, or when assuming duties of a temporary nature in an exempt (PAA) role. Consistent with routine audit activities, and prior to the on-site audit visit at Chicago State University, the Auditor requested a report from the Employer with respect to **Temporary Upgrade Assignments**; which was outlined in the Audit Request Material Checklist, Section IV (C), Employment and Separation

Procedures. The Employer’s response to this request was that Temporary Upgrade Assignments were not utilized during the five-year audit time frame, despite the fact that during previous audits, the Employer reported data regarding their routine use of Temporary Upgrades. Therefore, as a result of the Employer’s inability to provide Temporary Upgrade data for the current audit time frame, the Auditor was prompted to request additional compensation information.

On November 18, 2019, the Auditor submitted a follow up request to the Employer regarding the payment of additional compensation to Civil Service employees referred to as an “Override”, with the notion that many of these amounts would fall under standard regulatory provisions in the Illinois Administrative Code and technically defined as Temporary Upgrade Assignments. As referenced in the Criteria/Standards section of this finding, the Temporary Upgrade provision in the Code contains time frame limitations that are quite specific; and are not intended to be utilized on a long-term basis. A long-term need would demonstrate that a vacancy in that classification technically exists.

Pursuant to the Auditor’s request, the Employer provided a spreadsheet listing override transactions conducted during the audit time frame for Civil Service employees. This report included start and end dates of the override transactions, the amount paid, and the purpose of the override. The Employer indicated that the payments were given “in lump sum either as a total or monthly payment.” The Auditor further inquired regarding any compensation that would have resulted in employees being paid outside of the established range. The Employer stated that “on average, employees were not paid outside of the reported salary range. However, there may have been a few employees that may have exceeded the reported salary range. Further details would need individual analysis and research.”

CONDITIONS/FACTS (PART 2):

As documented in **Appendix A**, and based on the spreadsheet of information provided by the Employer, there were **sixty-seven (67)** instances where Civil Service employees were paid an override, at times in large amounts, when other statutory provisions should have been followed and were under obligation to be reported to the Auditor. The total amount paid in overrides for these Civil Service employees listed in **Appendix A** was **\$311,755.03**, and does not include those lump sum payments made to employees teaching courses to students, faculty employees, or other employees categorically exempt from the Act.

The Auditor reviewed the report provided and documented the following specific examples of significant concern below, which are also part of **Appendix A**:

- A. The following overrides were given to employees, capturing the same time period, for **performing duties at lower levels** in the assigned promotional line:

██████ ██████	Payroll Manager	5/1/2019	10/31/2019	\$15,000.00	60% of Payroll Specialist II Duties Due to Resignation
██████ ██████	Assistant Payroll Manager	5/1/2019	10/31/2019	\$10,000.00	40% of Payroll Specialist II Duties Due to Resignation
██████ ██████	Network Engineer I	6/15/2018	6/24/2019	\$5,000.00	Assumed Various Telecommunication Activities

B. In another example, sizeable overrides were given to employees for **performing duties inherent** to those typically representative of the assigned classification:

██████ ██████	Account Technician III	6/5/2019	7/31/2019	\$2,400.00	Handling Travel Reimbursements/Reporting
██████ ██████	Executive Secretary	9/1/2017	12/15/2017	\$2,500.00	Coordinated Fall 2017 Commencement Activities
██████ ██████	Executive Secretary	9/16/2016	8/30/2017	\$10,000.00	Performed Additional Duties per the President

C. In yet another example, sizeable overrides were given to employees for **performing higher level duties** that would otherwise be defined as a Temporary Upgrade Assignment and governed by the 30-day limitation outlined in the Illinois Administrative Code:

██████ ██████	Procedures System Analyst	2/16/2017	12/15/2017	\$10,000.00	Assumed Temporary Director Duties for Office of Undergraduate Admissions
██████ ██████	Police Officer	7/1/2015	12/31/2015	\$750.00	CSU Police Department Detective
██████ ██████	Police Sergeant	7/1/2015	12/31/2015	\$750.00	CSU Police Department Detective

D. **2015 – June 30, 2016 for the negotiation of fuel contractors and energy savings.** Simply stated, it would be inappropriate for a Civil Service employee to receive this level of compensation for a twelve-month period of time outside of statutory requirements under the State Universities Civil Service Act, such as through promotion or temporary upgrade.

██████ ██████	Assistant Chief Plant Operating Engineer	7/1/2015	6/30/2016	\$24,999.96	Negotiation of Fuel Contractors and Energy Savings
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While the Auditor was unable to confirm specific details with respect to this override payment, it does appear that it could meet specific bidding criteria under 30 ILCS 500, the Illinois Procurement Code.

Note: The Auditor did not request a listing of overrides for those employees categorically exempt from the Act, i.e., AP employees. However, given what is observed in the report provided by the Employer for Civil Service employees, and outlined in the examples above, it is suspected that the total amount of exempt employee overrides would be significant and greatly exceeds those given to Civil Service employees.

CAUSE/SOURCE OF CONDITION:

Evidence provided by the Employer suggests that a determination was made not to fill positions with permanent status employees or by promotion through a reclassification action and instead, the Employer provided lump sum compensation that was just simply easier, and arbitrary, for them to implement.

Additionally, various employees provided feedback to the Auditor that many employees will, in effect, “demand an override” for performing additional duties, even when those duties are consistent with their assigned classification or at lower levels in their assigned promotional line. Finally, the failure to utilize the Temporary Upgrade provision consistent with requirements in the Code to provide compensation for performing higher level duties of a classification is not only a material violation, but most likely resulted in significant monetary overpayment.

At the time of the original audit and initial follow-up, the Auditor was concerned that the Human Resource Department at Chicago State University lacked the knowledge and experience necessary to properly administer the various statutory requirements outlined in the Act, Code, and System Procedures for the recruitment, employment, and human resource management of Civil Service employees. Additionally, campus policy regarding the payment of overrides is inconsistently applied and Temporary Upgrade assignments, when necessary, are simply non-existent. The Employer has made strides to correct the lack of knowledge, however, the Auditor remains concerned about this topic, and others.

Based on the purpose statement provided by the Employer for each override given, the following statutory provisions required by the Act appear to be merely discounted:

- Powers and Duties of the Merit Board: Section § 36d(8) of the Act states, “**Vacancies shall be filled by promotion whenever practicable**...an advancement in class shall constitute a promotion.” Under a merit-based system, this concept is accomplished through open and continuous testing, reclassification, reallocation, reassignment, or recruitment for a new position based on a need to fill the position.
- Powers and Duties of the Merit Board: Section § 36d(1) of the Act requires the Merit Board to “approve a classification plan prepared under its direction, **assigning to each class positions of substantially similar duties**. The Merit Board shall have power to delegate to its Executive Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.” Section § 36d(2) of the Act requires the Merit Board “prescribe the duties of each class of positions and the qualifications required by employment in that class.”
- Section 250.100(b)(3) of the Illinois Administrative Code states, “...temporary upgrading and downgrading **assignments must not be for more than 30 consecutive work days duration**.” Temporary Upgrades must be utilized when short term assignment of duties are performed at a higher level within or outside of the employee’s assigned promotional line.

EFFECT/IMPACT:

The foundation of the Merit System and the primary concept of a classification plan management system is that employees are placed in job classifications based on the prominence of actual duties, minimum acceptable qualifications, and level of responsibility. The practice of creating a new job assignment through an arbitrary override payment is inconsistent with the intent and purpose of the Act, Code, and Classification Plan Management system.

According to CSU Employer Policy 4.5 in Article II, Section 4 issued June 1, 2001, an override is defined as “any monetary compensation over and above an employee’s annual contract salary earned during the contract period. This includes, but is not limited to, payments for extension courses, non-credit courses,

and participation in grants.” In addition, “when an override is sought as compensation for additional duties and responsibilities, such compensation shall not exceed 25% of the individual’s annual base salary.”

The application and execution of campus policy has, over time, eroded requirements otherwise defined in the Act and Code for Civil Service employees, and is where the issue lies with respect to several of the employees listed in **Appendix A**. For example, instead of filling a vacancy, sizeable overrides were provided to two employees in the amount of \$25,000 for performing lower level duties in the classification promotional line for a six-month period of time. These amounts would have most likely resulted in employees being paid outside of the established range.

Campus policy states that overrides are given as compensation over and above an employee’s annual contract salary, when the fact of the matter is that the policy misstates the Employer’s obligations under the Act. Additionally, it appears several employees received sizeable overrides for what appear to be duties already inherent to their classification, typical duties lower in the classification series, or would otherwise qualify as a Temporary Upgrade under Civil Service regulatory guidelines. This lends itself to campus administration essentially providing arbitrary compensation awards, or bonuses, for employees performing routine duties.

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 specifically requested that the Employer review, and comply with, regulatory requirements regarding the utilization of Temporary Upgrade assignments in accordance with established guidelines. The Employer is further reminded that Temporary Upgrades are frequently utilized when necessary to compensate employees when they temporarily assume duties of a higher classification or in other situations where a supervisory employee is temporarily replaced in his/her absence. The method of payment or the amount that is paid outside of an employee’s current classification base rate does not relieve the Employer from their obligation under the Act, Code, and Procedures.

The Auditor has significant concern that this issue rises to a level of additional scrutiny by other regulatory agencies. Additionally, the Auditor finds no justification for this practice within the Act, Code and Procedures and recommends that the practice of issuing compensation overrides for any employee within the University System be discontinued immediately.

What is of most significant concern is that in many instances, the duties performed by the employees and classifications listed in Appendix A, and what triggered the additional compensation, appear to be duties that are well within the scope of the incumbent’s assigned classification. However, without an evaluation of the applicable position descriptions, the Auditor is simply unable to accurately validate each override under this definition.

Though outside of the parameters of our Act/Administrative Rules, the Employer should consult with the State Universities Retirement System (SURS) regarding any penalties that could be imposed on the employer. Though SURS would need to provide specific review, there are instances if an employee exceeds designated parameters that the Employer is required to pay additional funds to SURS upon the retirement of the employee.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. In accordance with the Auditor's recommendation, the practice of issuing compensation overrides for any employee within the University System has been discontinued, except as noted below. Documentation sending notice to the President's Office, Provost's Office, and all Vice Presidents, Directors and Deans of the discontinuation of this practice is being provided to the Auditor. This correspondence also details the process for Temporary Upgrading.

There is one override that will require additional actions to discontinue. In previous years, the University contractually agreed to pay a telecommunicator within a particular bargaining unit an increase in his/her salary to receive certification and perform duties of a LEADS Agency Coordinator. Since the union contract is currently under negotiation, the University will identify an alternative method to compensate an employee for these duties in the future.

ADDITIONAL AUDITOR COMMENTS:

The Auditor received the new policy documentation described above, consistent with the actions taken. With respect to the LEADS Agency Coordinator contractual issue, the Employer will be required to document any alternative method agreed upon in the collective bargaining process and consult with the University System regarding this agreement to ensure it complies with the Act and Code governing compensation for Civil Service employees.

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**CSU FY20-04 EXEMPTION AUTHORIZATION APPLIED TO POSITIONS THAT CORRESPOND
TO CIVIL SERVICE CLASSIFICATION SPECIFICATIONS**

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. *"The Employer exempts positions from Civil Service regulations based upon the information provided in the job description provided by the department. The Employer compares with the specifications provided by the State Civil Service System and based upon that information, the Employer may exempt a position from Civil Service."*
2. *"The process and procedure for evaluations [sic] positions and categorizing them under 36e(3) or 36e(4) involves comparing the job description or position requested with the guidelines provided within 36e(3) or 36e(4). We are currently developing a process that will allow positions [sic] descriptions to be reviewed according to the triennial review standard."*

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.

Following a review of the sampled position descriptions, which included on-site interviews with various exempted employees, it was determined that **thirty-nine (39)** exempt positions listed in **Appendix B** were performing duties matching the specifications for various Civil Service classifications. (86%) The positions

cited simply do not contain the duties or level of authority and responsibility that would typically fall outside the specifications of standard professional, managerial, or technical Civil Service classifications.

It is important to note that the position description documents contained several errors, including incorrect job titles and a lack of documented validation by the incumbent and supervisor as required by the triennial review standard in the Exemption Procedures Manual. Even though the position description log, which is requested separately by the Auditor and used as a tracking mechanism to ensure that reviews occur on a timely basis, contained various dates from June through October 2019, many incumbents denied during their interview with the Auditor that they had ever seen or reviewed their position description. In fact, the position description documents themselves indicated the last update as February 2010 and many of these documents were updated by incumbents during their position review and interview with the Auditor. ***Further detail in this area is documented later in this report.***

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 observed missing components in each of the documents reviewed. It was observed during the current FY2020 Audit, that educational requirements, knowledge, skills, or abilities were notably absent from the 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 State Universities 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 **fifty-eight (58)** exempt position descriptions and identified **nineteen (19)** 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 **eighty (80)** exempt position descriptions and determined that **forty-five (45)** positions were performing duties matching the specifications for various Civil Service classifications. [*Finding Codes CSU FY15-01, pages 4-7 and Finding Code CSU FY13-03, pages 16-21*].

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 or errors in all 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 positions cited 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 time frame 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 (resumé 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 LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. In accordance with the Auditor’s recommendation, officials of the Office of Human Resources have reviewed the policies with respect to exempting positions consistent with the Exemption Procedures Manual, Section 3.2 related to the Internal Review and Accountability for exemption authorization. For the positions referenced in the Draft Audit Report, CSU will provide the Auditor updated position descriptions on or before **November 31, 2020**.

The University has no objection to the temporary suspension of its exemption authority for a six-month period beginning August 1, 2020 – January 31, 2021. During any suspension period, CSU respectfully requests training from SUCSS on the exemption authorization process.

The University is actively making steps towards compliance. The Office of Human Resources is currently reviewing the positions cited in this finding and agrees to convert several of the positions, as advised. To further indicate our commitment to complying with exemption rules, the University has already converted positions cited in this finding. The following positions have been converted to Civil Service effective July 1, 2020:

Employee Name	Title	Date of Appointment	Date of Conversion	Current Civil Service Classification
	Coordinator of Alumni Affairs	8/1/2019	7/1/2020	Assistant Director of Alumni Relations
	Assistant Director, Marketing & Media Relations	8/1/2019	7/1/2020	Marketing Associate
	Career Development Specialist	10/1/2019	7/1/2020	Program/Student Advisor
	Assistant Director of Government Affairs and Community Relations	8/1/2019	7/1/2020	Community Affairs Specialist

ADDITIONAL AUDITOR COMMENTS:

The Employer is required to revise or correct the systemic issues that resulted in this finding. The University System remains concerned that, as an overall topic, positions are not being exempted from Civil Service regulatory guidelines appropriately and that position description documents have not been properly maintained. As a result, the University System is suspending the authority of the Designated Employer Representative (DER) at CSU regarding this topic until such time as delegated authority is returned to the DER. The Employer will be required to submit certified position descriptions to University System staff for approval prior to the exemption of any position from Civil Service regulations.

In addition to the previous recommendations noted above, the University System is committed to providing concurrent training module sessions for HR Staff regarding several topics consistent with each step in the Civil Service employment process, including but not limited to, the designation of positions, maintenance of reemployment registers, calculation of seniority, and the recording of personnel transactions.

Chicago State University
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-05 NON-COMPLIANCE WITH OPEN AND CONTINUOUS TESTING PROVISION

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.50 Examinations; and*
- 3) *Examination Procedures Manual, Section 1.3, Scheduling Examinations.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(5) “To prescribe standards of examination for each class, the examinations to be related to the duties of such class. The Merit Board shall have power to delegate to the Executive Director and his or her staff the preparation, conduct, and grading of examinations.

(6) To authorize the continuous recruitment of personnel and to that end, to delegate to the Executive Director and his or her staff the power to conduct **open and continuous competitive examinations** for all classifications of employment.

(7) To cause to be established, from the results of examinations, registers for each class of positions in the classified service of the University System of the persons who shall attain the minimum mark fixed by the Merit Board for the examination; and such persons shall take rank upon the registers as candidates in the order of the relative excellence as determined by examination, without reference to priority of time of examination.

(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.”

Section 250.50(a) of the Illinois Administrative Code states in part, “Examinations shall be **open and competitive examinations**. For the purpose of this Section, an original entry and a promotional examination shall be considered to be one and the same examination. “

Section 250.50(f) of the Illinois Administrative Code states in part, “[A]s approved by the Executive Director, examinations shall be scheduled and administered by the employer. The examinations shall be conducted on an **open and continuous basis**.”

BACKGROUND/CONTEXT:

Examinations shall be conducted on an open and continuous basis, except for examinations to Original Entry registers at each place of employment that have a sufficient number of candidates on the register

which preclude further recruitment and testing. The conduct and frequency of providing examinations and promotional opportunities are evaluated as an overall systemic review by the Auditor under a Category 1 Risk Assessment; therefore, issues that arise in any of these other areas are cited separately depending on the severity of non-compliance.

CONDITIONS/FACTS:

Consistent with standard protocols for the FY2020 Governance, Risk, and Compliance Audit, the Auditor reviews various aspects of the overall human resource function. Specifically, this includes the application, admittance to the examination, register maintenance, and referral of candidates for vacant Civil Service positions. The purpose of this review is to determine whether the employment protocols utilized by the Employer are adequate to ensure compliance with the Act, Code, and System Procedures; and to determine whether the Employer has established a sound program of personnel administration.

The Auditor conducted a review of electronic examinations given by Chicago State University during the five-year audit time frame. As a result of this review, it was determined that there were only three-hundred **seventy-seven (377)** electronic examinations given, with **ninety-four (94)** of those given to candidates or employees in the Police Series. **(25%)** As documented in other areas of this report, and as evidenced by the total number of Extra Help hours utilized during the audit time frame in the clerical, accounting, skilled, and grounds areas, combined with the total amount of State dollars awarded to employees in the form of salary overrides, and the completion of only **six (6)** desk audits conducted during the audit time frame, it is clearly evident that fundamental human resource deficiencies exist as it relates to compliance with Civil Service regulatory requirements.

During the audit out-brief on and as part of the Preliminary Observation Report dated February 7, 2020, the Auditor instructed the Employer to develop and institute an open and continuous testing schedule that meets fundamental statutory requirements, and consists of an organizational evaluation, assessment of manpower and turnover rates, and distribution of labor. The Employer was also instructed to provide scheduling information to the Auditor no later than March 13, 2020.

The Employer did not provide this information even though the Auditor provided useful suggestions in which to complete the task.

CAUSE/SOURCE OF CONDITION:

Evidence provided by the Employer suggests that determinations were made over time not to fill positions with a permanent status employee or by utilizing promotion for classification advancement through a reclassification action and instead, the Employer simply chose to overutilize Extra Help appointments, provide lump sum compensation overrides, and disregard the need to conduct desk audits when needed through routine position description reviews or when requested by employees.

Organizationally, the Human Resource Department at Chicago State University lacks the knowledge and experience necessary to properly administer the various statutory requirements outlined in the Act, Code, and System Procedures for the recruitment, employment, and human resource management of Civil Service employees.

EFFECT/IMPACT:

Under a merit-based system, the concept of open and continuous testing for the recruitment and employment of candidates or employees to new positions, and the reclassification or reallocation of

current employees to classifications for which they otherwise possess the minimum acceptable qualifications to be assigned is a basic and fundamental requirement of the University System. Ultimately, the lack of testing when vacancies were clearly evident resulted in a snowball effect that impacted other compliance requirements and employment activities. In fact, according to records provided by the Employer, there were only fourteen (14) new Civil Service employees hired from January 2014 until July 2019.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

The foundation of the Merit System and the primary concept of a classification plan management system is that employees are placed in job classifications based on the prominence of actual duties, minimum acceptable qualifications, and level of responsibility. This is ascertained through the administration of an exam.

The Examination Procedures Manual, Section 1.3 provides that “upon application, a qualified applicant should be scheduled to write the examination for the classifications selected at the earliest available date, preferably within 15 days.” However, an open and continuous testing program allows Employers to set priorities and develop policies in managing testing schedules that provide for a variation in testing schedules for different classifications based on local operational and employment requirements, as long as all examinations for the classifications utilized at that employment location are offered on a regular and recurring basis. This may include testing schedules that allow for more frequent testing of some classifications that have multiple vacancies and continuous turnover, or less frequent testing of some classifications that have virtually little turnover and no vacancies over an extended period of time. Some employers have established monthly or quarterly testing processes so that applicants can be confident in opportunities for examinations.

To achieve compliance in this respect, it is specifically requested that the Employer review, and comply with, regulatory and procedural requirements regarding open and continuous competitive examinations by developing a testing schedule as noted above. This schedule shall be included in the Employer’s administrative response to this finding.

EMPLOYER’S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. In accordance with the Auditor’s recommendation, CSU has developed an open and continuous Testing Schedule. The Testing Schedule has been posted on the HR page of the University’s website. In addition, on July 10, 2020, information related to open and continuous testing was sent in a blast email to all current CSU Staff members.

A copy of the Testing Schedule and a description of the process is included below:

Chicago State University
Office of Human Resources
Open & Continuous Testing
For
Civil Service Positions

All Civil Service position titles listed at Chicago State University are subject to State Universities Civil Service *Section 70/36d, section 1.3* of the Examination Procedures Manual for Open & Continuous testing procedures.

GENERAL INFORMATION

Purpose: The Open Competitive Continuous Examination Program offers applicants the opportunity to periodically establish employment eligibility for positions within Chicago State University (CSU). Examinations are used to establish open competitive eligible listings upon which appointments are based. Refer to the Open Competitive Continuous Examination Program Title Listing for an inclusive listing of open examination job titles.

How to Apply: CSU uses an electronic applicant system called Peopleadmin. A separate application is required to apply for each job title categories classified as Civil Service. **Note:** It is the responsibility of the applicant to notify the CSU of all changes to contact information contained in an application (i.e. name, address, telephone, educational achievement, etc.). Such changes can be made by updating their on-line employment application, so we have a current contact number or address in the event you need to be contacted for an exam or interview.

Test Scheduling for Open Examinations: Examinations given on a regularly scheduled basis, except for sworn law enforcement job titles. Testing is conducted at the CSU Office of Human Resources, 9501 S. King Drive, Chicago, IL 60628. Please refer to the testing schedule for specific days, times. Applicants will generally be called within 15-30 days to schedule exams.

Applicants may retake the exam within 30 days of the initial exam date, and three times within the course of a year. Your highest score is always kept on the register for the stated above period.

Test Scheduling for Closed Examinations: For titles listed as closed examinations, examinations are administered as the need arises.

EXAMINATION TYPES

The types of examinations evaluation an applicant may encounter when applying for Civil Service titles are:

- 1) **Electronic Testing – (E-Test) using touch-screen**
- 2) **Written Examinations (when E-Test is not yet available.)**

3) Training and Experience Evaluations

4) Written Examinations with Performance Tests (Law enforcement applicants)

Accommodations Testing: Individuals covered under the Americans with Disabilities Act or those requiring special assistance with the testing process may request a **Testing Accommodations Request Form** from the Department of Personnel. The form, along with any applicable documentation, must be completed and submitted to the Department of Personnel for review, determination and, if applicable, scheduling for testing.

Extra Help/Temporary Position Titles: Temporary employees perform work that is temporary or seasonal, for which duties and responsibilities performed are **not to exceed more than 900 hours within six months of any 12-month period**. Temporary appointments are made without regard to an eligible list; however extra help positions are subject to end at will. Extra help employees must also participate in competitive testing if they are interested in applying for a Civil Service classified position.

CREDENTIALING

Incomplete applications will delay the eligibility for testing evaluation. **Please ensure you have provided a completed employment application, resume and education credentials.** All credentials will be used to evaluate your eligibility for testing consideration.

Veterans Preference: Applicants claiming Veterans Preference MUST submit documentation the most recent Certified DD214/215 or NGB22 verifying eligibility at the time of testing or before a list of eligible applicants is called.

If documentation is not submitted accordingly, applicants will not appear on the list as "Veterans Preference Eligible." Once appropriate documentation has been received and verified, Veterans Preference will be awarded. Certified documents submitted to the Office of Human Resources will remain the property of CSU. **Note: It is a Class A misdemeanor to fraudulently represent yourself as a veteran.**

Length of Eligibility: Eligibility for employment is valid from the date of successful examination or qualification. An applicant will receive a certified mail notification if their name will be removed from any associated eligible list(s) accordance with the Civil Service Rules, Section 250.60 (G). In order to re-establish eligibility, an applicant must repeat the examination process

A high examination ranking does not guarantee that an applicant will receive an invitation to interview or an offer of employment. Scores are ranked based on the top three highest scoring applicants, which are then referred to the hiring manager to interview. All applicants with successful examination results are placed on the Employment Register.

Our Employment Registers are maintained based upon the following categories:

- Reemployment
- Promotional
- Original Entry registers

TESTING DAYS & TIMES

Electronic Examinations will occur on a weekly basis, by appointment only
(2 sessions per day):

{Wednesdays Only}

9:00 a.m. - 12:00 p.m.

1:00 p.m. - 4:00 p.m.

Note: Plan accordingly, as some tests can take between 1 to 4 hours to
complete

Testing Location:

CSU Office of Human Resources
9501 S. King Drive, Chicago, IL 60628
773-995-2040
HR@csu.edu
(By appointment)

LATE ARRIVALS WILL NOT BE ADMITTED. PLAN TO ARRIVE 15 MINUTES BEFORE
TESTING AND BE PREPARED TO PRESENT A VALID ID CARD.

EXAMINATION GRADING

Computer-based exams are electronically scored via the program used at the State
Universities Civil Service System (SUCSS). All paper-based exams are individually
scored in the Office of Human Resources. A score of 70 or higher is considered
passing. Veteran's Preference points for those who qualify may be added to your final
score.

CSU IS AN EQUAL OPPORTUNITY EMPLOYER

In compliance with the Illinois and U.S. Constitutions; the Civil Rights Acts of 1964 and 1991; the
Equal Pay Act of 1963; the Age Discrimination in Employment Act of 1967; the Americans with
Disabilities Act of 1990; the Illinois Civil Rights Act of 2003; and the Illinois Human Rights Act, CSU
does not discriminate in employment, contracts or any other activity.

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Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-06 NON-COMPLIANCE WITH SECURITY OF EXAMINATION MATERIALS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.50(f) Administration of Examinations; and*
- 3) *Examination Procedures Manual, Section 18.1, Security of Examination Materials.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(5) To prescribe standards of examination for each class, the examinations to be related to the duties of such class. The Merit Board shall have power to delegate to the Executive Director and his or her staff the preparation, conduct, and grading of examinations.

Section 250.50(f) of the Illinois Administrative Code states in part, “[T]he employer shall be responsible for the security of all examination materials in the employer’s custody and access to any electronic examination process, as provided to the employer by the University System.”

The Examination Procedures Manual refers to the security of examination materials in a fundamentally simple manner through the employer’s periodic inventory of examining supplies and examinations, locked file cabinets to ensure examinations are given adequate protection, and that obsolete and defaced testing materials be destroyed by the Human Resource Office. This level of security also extends to electronic examinations housed within the E-Test platform and accessed through computer systems in the testing area.

Examinations shall be administered and proctored in a secure fashion with materials being checked by the proctor upon entering the testing area and upon leaving. Further security requirements include not scoring examinations in the presence of applicants, not leaving graded, partially graded, or ungraded materials in open/exposed areas, restricting access to file cabinets and restricting access to employees not directly involved in the administration and grading of tests or files containing copies of examination materials, such as blank tests, completed tests, rating sheets, and answer keys/bubble sheets, etc.

BACKGROUND/CONTEXT:

The security of University System examination instruments are a critical function and responsibility of the Designated Employer Representative (DER). Compromise of these instruments is not only a violation of the Act, but can also have severe employment and criminal consequences, as well as have a devastating impact on basic Civil Service employment protocols statewide. As a practical matter, significant man-hours have been spent by subject matter experts, human resource professionals, and University System

staff in developing every examination instrument in the classification plan. Consequently, when an examination is compromised, it creates a significant interruption in the employment process, leads to unfair employment processes, and unnecessarily diverts resources in which to revise and redevelop the examination again.

CONDITIONS/FACTS:

The Civil Service classification plan contains hundreds of specifications, each of which has its own examination. 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 information regarding the security of examination instruments, human resource personnel access, destruction of paper examinations, and E-Test password updates. The Employer indicated in their response that paper examination materials were kept in locked file cabinets within the examination room, that access was limited to two human resource staff personnel, and that old paper exams were shredded when no longer needed or became obsolete.

During the on-site visit, the Auditor reviewed examination protocols and records as part of standard audit activities. As related to the security of examination instruments, the following issues were discovered:

- a. As previously referenced in this report, the Auditor sampled the employment records of **eighteen (18)** new employees hired within the audit time frame. This review also consists of reviewing registers to determine eligibility to take the examination, scoring placement, referral of applicants, and employment of Civil Service employees. When reviewing the personnel file of [REDACTED], the Auditor discovered the original **Budget Analyst** knowledge test and scratch paper, ungraded blue Scantron bubble sheet, and informational supplement completed by the (then) candidate.

Due to the Employer's inability to produce an employment register verifying [REDACTED] referral and employment to the Budget Analyst position, the evidence indicates that she was employed into a Civil Service classification without successfully receiving an examination score or placement on the appropriate employment register for the classification. Technically, [REDACTED] did not complete the required examination for employment. Upon discovery of these materials by the Auditor, they were properly confiscated and secured in the audit file.

- b. When conducting inventory of paper examination materials on-site, the Auditor selected a sample of **eighteen (18)** classifications and associated exam instruments to review for currency and ensure that only the most recent examination is administered to applicants at any given point in time. Of those sampled in the Employer's inventory, the examinations for Security Guard (2002), the Painter Series (1999), and the Clerk Series (2000), which consisted of **ten (10)** separate examination instruments, were obsolete due to recent revisions by the System Office in 2016 and 2019.

Upon discovery of these obsolete examination instruments, and to ensure that future applicants are not inadvertently administered an invalid exam, the Auditor instructed the Employer to destroy all paper examinations in their inventory. If the Employer needs to conduct testing in

classifications that still require a paper examination to be administered, the testing administrator will be required to submit an examination order to the University System.

- c. During the on-site visit, the Auditor conducted a security analysis of the Employer's computer desktops located in their testing room. These dedicated desktop computers provide access to the University System electronic testing (E-Test) platform where the vast majority of examinations are accessed by human resource officers state-wide to administer exams to applicants.

Due to the exposure of examination materials and risk of potential compromise, careful security measures must be implemented by System Employers and their Information Technology staff to ensure that these sensitive materials remain electronically secure. Proper security measures often include disabling other MS Office programs, locking down access to other internet browsers, and eliminating the use of the keyboard.

The Auditor tested the security of the E-Test platform and found that by utilizing specific functions and keystroke combinations, it was possible to minimize the test environment window and provide open access to external programs and internet browsers. The Auditor requested the Employer coordinate with their Information Technology Department to restrict or disable function keys if keyboards could not be moved. This was to be completed prior to administering any further computerized examinations.

Following the on-site visit, the Employer indicated through follow-up communications that the F1 keys on all of the keyboards dedicated to administering Civil Service examinations had been disabled pursuant to the Auditor's request.

CAUSE/SOURCE OF CONDITION:

The Employer was unable to ensure or demonstrate that adequate security measures were implemented or practiced during the audit time frame related to the inventory and administration of Civil Service examinations. Additionally, the Employer indicated in the post audit out-brief that a former employee entrusted to administer [REDACTED] examination did not handle or process the documentation properly.

EFFECT/IMPACT:

As previously noted in this finding, each Civil Service classification requires the administration of a dedicated examination instrument. Compromise of these instruments can have severe employment implications and a devastating impact on basic Civil Service employment protocols statewide. If applicants are able to access other programs during an electronic examination, and utilize those platforms to dishonestly obtain information to complete the exam, or worse, remove examination information from the testing room, those actions can result in criminal penalties.

If an examination is compromised, or an invalid/obsolete examination is given, an employment decision can be invalidated as a result. Additionally, significant man-hours have been spent by subject matter experts, human resource professionals, and University System staff in developing every examination instrument in the classification plan. Consequently, when an examination is compromised, it creates a significant interruption in the employment process for all University System employers (not just Chicago State University), leads to unfair employment processes, and unnecessarily diverts resources in which to

revise and redevelop the examination again. Currently, the University System is engaged in pursuing criminal charges with an applicant who appears to have compromised the Electrician examination. This potential compromise has resulted in thousands of dollars, in the way of staff time, to be allocated in revising the entire examination for the classification AND classification series, all of which are used at each state university.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

Consistent with discussions during the Post-Audit Conference, the Employer has communicated to the Auditor that all paper examinations have been destroyed and that the IT Department has disabled the F1 keys on the keyboards of all computers that administer Civil Service examinations through E-Test. The Employer should check these functions periodically, especially following specific computer upgrades or updates, to ensure that security protocols remain in place and the E-Test platform remains secure.

The Auditor further recommends that if paper examinations are needed in the future, that the precise number of examinations are ordered from the University System Office. The University System Office will not allow additional examinations to be ordered for the purpose of retaining an inventory and the Employer is not authorized to possess an inventory of paper examinations in the future.

As for the employment of [REDACTED] without a 'completed' examination, this is extremely problematic; without an examination score, register placement, or referral among the 'Top Three' highest scoring applicants, it is considered a significant violation of various statutory regulations. Since the Auditor took possession of the examination, Scantron bubble sheet, and informational supplement, University System staff will grade the examination to ensure that [REDACTED] has, at a minimum, successfully passed the exam.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. As previously confirmed with the Auditors, all paper examinations have been destroyed and the IT Department has disabled the F1 keys on all keyboards of all computers that administer Civil Service examinations through E-Test. The Office of Human Resources has also communicated to the IT Department that additional computer checks must be conducted routinely to ensure continued security.

To the extent paper examinations are needed in the future, such paper examinations will be ordered from the University System Office.

The Auditor notified CSU on June 3, 2020 that [REDACTED] [REDACTED] had passed the Budget Analyst knowledge test with a score of 77.

Chicago State University
Final Audit Report

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

CSU FY20-07 NON-COMPLIANCE WITH EXTRA HELP EMPLOYMENT AND POSITION LIMITATIONS

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.

CONDITIONS/FACTS:

The Auditor reviewed approximately **four-hundred sixty (460)** Extra Help appointments, which encompassed two-hundred sixteen (216) employees and three-hundred seventy-five (375) positions.

As documented in **Appendix C, fifty-one (51) employees** appear to have worked beyond the 900-hour limitation without the required 30-day break in service.

It should be noted that nine (9) employee totals listed in Appendix C and highlighted in red have an appointment end date in the future, with the employee still working and exceeding the 900-hour limitation as of the date the report was submitted to the Auditor on January 7, 2020. During the post-audit conference on February 7, 2020, the Auditor instructed the Employer to terminate those appointments within the next 30 days. The Employer was instructed to provide documentation to the Auditor that these appointments were terminated no later than March 13, 2020.

As documented in **Appendix D, forty-seven (47) positions** were utilized for more than 900 hours of actual work within a 12-month period without a six-month lapse. It appeared that a few of the positions cited have multiple incumbents employed through them at the same time.

It should be noted that this audit period revealed a dramatic increase of employee and position violations than during previous audits. Based on the information provided in Table 1 below, this information is broken down by fiscal year:

Table 1

<i>FY2020 Governance, Risk, and Compliance (GRC) Audit</i>			
<i>Review of Extra Help Violations During Previous Audits</i>			
<i>Fiscal Year</i>	<i>Audit Timeframe</i>	<i>Employee Violations</i>	<i>Position Violations</i>
<i>FY2011</i>	<i>November 1, 2008 – October 31, 2010</i>	<i>6</i>	<i>16</i>
<i>FY2013</i>	<i>November 1, 2010 – October 31, 2012</i>	<i>18</i>	<i>5</i>
<i>FY2015</i>	<i>November 1, 2012 – October 31, 2014</i>	<i>15</i>	<i>6</i>
<i>FY2020</i>	<i>November 1, 2014 – October 31, 2019</i>	<i>51</i>	<i>47</i>

CAUSE/SOURCE OF CONDITION:

Based on the information provided by the Employer, it does not appear that adequate protocols to efficiently and effectively monitor Extra Help limitations were established or maintained. Furthermore, the process of pooling extra help positions, or otherwise allowing one extra help position to be shared by multiple employees concurrently lends an additional layer of complexity and does not allow for proper position monitoring and regulating of employee work times in accordance with the Illinois Administrative Code and System Office Procedures referenced above. The required six-month lapse before a position

can be reestablished does not appear to have been followed in many instances, resulting in the extended use of appointments and positions well beyond the 900-hour limitation.

The current FY2020 Governance, Risk, and Compliance Audit outcome related to this topic indicates that new monitoring processes and protocols 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 and monitoring practices related to Extra Help appointments during this audit time frame appear to be significantly lacking. Many of these appointments far exceed the 900-hour limitation; and there is a disconnect between the lack of open and continuous testing for status positions and demonstrated need based on the sheer number of Extra Help hours worked during the audit time frame.

Extra Help appointments appear to be utilized longer than allowed, impacting the overall employment environment, which is inconsistent with the Illinois Administrative Code and Employment/Separation Procedures Manual. In fact, the total number of work hours in an Extra Help capacity for this time period exceeds 174,000 hours. The primary occupations cited in Appendix C and Appendix D, and accounting for approximately 73,000 total hours are focused in the skilled, clerical, accounting, and grounds areas.

FINDING(S) FROM PREVIOUS AUDIT(S):

Please refer to the chart previously noted in this finding. *[Finding Code CSU FY15-02, pages 8-10; CSU FY13-06, pages 28-30; and CSU FY11-07, pages 24-26].*

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 emergencies, position vacancies, leaves of absence, and peak work periods in accordance with established regulatory guidelines and procedures. Extra Help appointments are not intended to be used as a sole source of employment that completely avoids the proper examination and referral of candidates to fill status positions.

We strongly recommend that the Employer conduct an internal review of their procedures to identify their deficiencies with respect to the Extra Help monitoring process and implement stricter position management 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.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation.

Appendix C to the Draft Audit Report contained a list of employees who appeared to have worked beyond the 900-hour limitation without the required 30-day break in service. Attached are the screenshots from the Banner System showing when these appointments were terminated.

Appendix D to the Draft Audit Report contained a list of positions that were utilized for more than 900 hours of actual work within a 12-month period without a six-month lapse. Attached are the screenshots from the Banner System showing when these appointments were terminated.

In accordance with the Auditor's recommendation, CSU is working to improve its protocols to efficiently and effectively monitor Extra Help assignments. To this end, CSU will be conducting an internal review of its procedures to identify deficiencies with respect to the Extra Help monitoring process and implement stricter position management protocols. CSU has no objection to providing periodic reports of extra help appointments to be submitted and reviewed for proper application of the compliance standards.

ADDITIONAL AUDITOR COMMENTS:

The Employer is required to revise or correct the systemic issues that resulted in this finding. The University System remains concerned that, as an overall topic, Extra Help appointments and positions are being utilized inappropriately and have not been adequately monitored. As a result, the University System is suspending the authority of the Designated Employer Representative (DER) at CSU regarding this topic. The Employer will be required to submit a request to establish an Extra Help appointment from the University System prior to the employment of any Extra Help employees or positions, until such time as delegated authority is returned to the DER.

In addition to the previous recommendations noted above, the University System is committed to providing concurrent training module sessions for HR Staff regarding several topics consistent with each step in the Civil Service employment process, including but not limited to, the designation of positions, maintenance of reemployment registers, calculation of seniority, and the recording of personnel transactions.

Chicago State University
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Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-08 EMPLOYEES PAID OUTSIDE OF APPROVED SALARY RANGES

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d(3) Powers and Duties of the Merit Board; and*
- 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 Salary Data System. However, as a practical matter, this current 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. On December 20, 2019, the Auditor provided a list of ranges that required correction in the Salary Data System. At the on-site visit from January 21 – 24, the Auditor discovered that the Employer had not submitted salary range updates to resolve the red flags that had been communicated the month prior. The Auditor provided a secondary deadline of January 31, 2020 and was provided specific instructions to complete all salary ranges as requested.

As of February 5, 2020, the Employer still had not provided corrections for **fifty-four (54)** employees. During the post audit conference on February 7, 2020, the Employer was provided with their Preliminary Observation Report, which outlined the remaining discrepancies and was given a third deadline of

February 28, 2020 to rectify the remaining issues. While the Employer did provide some updates, the Auditor found that some of their initial salary updates had been denied by the University System due to the Employer submitting inaccurate wage addendums that were not current. Upon submission of these inaccurate documents to the Salary Data System, the denial prompts an auto generated email message to the Employer with the rationale as to why the range submission was denied, and what is needed in order to approve the range submission.

As of April 14, 2020, and according to live data contained in the Salary Data System, there are still **forty-one (41)** employees whose ranges 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 LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. The Office of Human Resources has submitted salary range adjustments for the employees listed in this finding. The University has also received approval of these submissions from the SUCSS. A small percentage of the employees identified are being reclassified into active classifications and any remaining information will be updated on or before July 31, 2020.

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Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-09 NON-COMPLIANCE WITH TRIENNIAL REVIEW OF EXEMPT POSITION DESCRIPTIONS

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 1.2 Overview, and*
- 4) *Exemption Procedures Manual, Section 3.1 Accountability Program, and*
- 5) *Exemption Procedures Manual, Section 3.2 Internal Review.*

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.

The Exemption Procedures Manual, Section 3.2 Internal Review refers to the “Position Assessment Process as a cyclic review program wherein position descriptions for all exempt positions are reviewed by the Employer for currency of job content and title no less often than once every three years. Job changes of exempted positions discovered as a result of this review should commence immediately; however, any conversion to an appropriate civil service classification should be completed in accordance with section 3.3 of the Exemption Procedures Manual.”

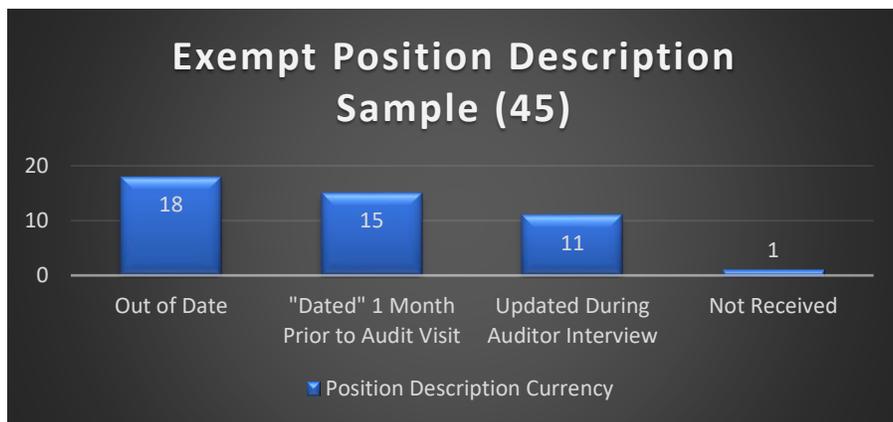
BACKGROUND/CONTEXT:

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 issue impacts the current sampling method and depth of review.

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.

CONDITIONS/FACTS:

Consistent with the targeted exempt position audit sampling method as described previously in this report, 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. The following chart articulates the status of the position description documents sampled for this audit period:



Pursuant to the Auditor’s request, the Employer provided a separate position description log that lists each exempt position, incumbent name, and the date of last position description review. Even though the position description log contained various review dates ranging from June 2019 through October 2019, the position description documents themselves did not reflect any of the dates on the log.

Consequently, authentication of the position description by the incumbent and supervisor, as required by the triennial review standard in the Exemption Procedures Manual, was not proven to have actually occurred. In fact, the position description documents that were 'out of date' indicated the last update as February 2010.

During the on-site visit, many incumbents interviewed by the Auditor denied ever reviewing or seeing their position description. As a result, the Auditor was required to allow those incumbents to make necessary edits to their position description in order to authenticate the documents prior to beginning the interview.

Consistent with the actual review of position description documents in the requested sample, the Auditor observed several errors, including incorrect job titles and incomplete duty statements, as well as other missing components in many of the documents reviewed, such as educational requirements, knowledge, skills, or abilities. 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. In addition, the position description requested by the Auditor and not received was for a Financial Aid Specialist, position number A56500.

CAUSE/SOURCE OF CONDITION:

The Employer has not maintained adequate business processes to properly manage exempt position descriptions as procedurally required. Since the position description is the primary mechanism that justifies and validates an exemption from the Act, it is apparent that the Employer simply does not have a cyclic review program with respect to position descriptions.

EFFECT/IMPACT:

Classification plan management protocols include base line standards for exemption authorization and evolve simply around one central concept, an evaluation of the position description. The cornerstone of proper position control management lies with the proper administration and maintenance of the position description. This is a fundamental necessity. Without this component in place, exemption authorization simply cannot be validated resulting in significant liability consequences.

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.

This issue has a direct correlation to the exemption finding referenced previously in this report where 86% of the exempt position sample was found to directly correspond to Civil Service classification specifications. The Auditor noted that the positions cited in that finding simply do not contain the duties or level of authority and responsibility that would typically fall outside the specifications of standard professional, managerial, or technical Civil Service classifications.

FINDING(S) FROM PREVIOUS AUDIT:

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

RECOMMENDATION TO EMPLOYER:

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.

The University 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 the documents reviewed. Again, 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.

It should be noted that on March 3, 2020, the Employer provided a new position description workflow to the Auditor for suggestions in capturing an electronic method of validation between incumbents and supervisors. Upon review of the Employer's new workflow, the Auditor made some additional recommendations such as, documented checks to review authenticated position descriptions by human resources and confirming that actual communication of the job duties occurred between incumbents and supervisors. Solely utilizing an electronic mechanism for authenticating position descriptions does not go far enough in the validation of these documents. There needs to be an additional mechanism to ensure that incumbents and supervisors have reviewed the documents and communicated its contents.

Consistent with the Exemption Procedures Manual, it is requested that the Employer immediately establish new business procedures to properly maintain the position descriptions for these exempted positions. These new procedures shall include emphasis in communication to the campus community regarding the fundamental importance of the establishment of a periodic position development and review process for all exempt positions. Employees directly responsible for performing the position description review and analysis should be routinely informed and trained regarding classification plan management concepts, specifically those directly related to the exemption authorization process and corresponding procedures.

Therefore, with respect to the position descriptions referenced in this finding, it is requested that the Employer immediately begin updating these documents to include standard job components to determine the appropriate position designation for each position. Again, these missing components include educational and work experience requirements, as well as specific knowledge, skills, and abilities considered necessary for satisfactory performance and completion of the duties in a given position. Following that process, the Employer shall provide the new process to the Auditor, to include a timeline for the complete review and update of all exempt position descriptions on campus. This plan shall be provided in response to this finding as part of the Employer's Administrative Response.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. The University's Office of Human Resources has implemented a new process which will result in the annual review and validation of position descriptions for all active exempt employees within the University. The process consists of having the incumbent and the incumbent's supervisor validate the current job description during the annual performance review

process. The incumbent and the supervisor will be asked to provide a signed and dated job description to the Office of Human Resources. During this year's performance review process, there is a coronavirus pandemic, which will limit the ability for supervisors and employees to conduct performance evaluations in person. Therefore, due to the current coronavirus pandemic, the Office of Human Resources will accept electronic signatures due to the fact that most employees do not have access to a printer and/or scanner while working remotely. Also, due to the pandemic, annual performance review deadline has been extended to September 30, 2020.

Once the authenticated job descriptions are submitted to the Office of Human Resources, the HR staff will review each exempt job description to ensure that the following components are included:

- A. Standard job duties and basic components that determine the appropriate position designation for the position;
- B. Educational and work experience requirements; and
- C. Specific knowledge, skills, and abilities considered necessary for satisfactory performance and completion of the duties in the position.

If the Office of Human Resources determines that the components listed above have not been included in the job description, the job description will be sent back to the supervisor for revision. After the revision, the revised job description will be sent back to the incumbent for signature and authentication.

The Office of Human Resources will be able to provide documentation of authenticated position descriptions to SUCSS on or before November 30, 2020.

In addition to the annual review of job descriptions as part of the performance evaluation process, job descriptions will also now be reviewed at the time of hire by the new employee and his/her supervisor. Both parties must confirm the accuracy, make any necessary revisions, sign a copy of the job description, and submit it to the Office of Human Resources for review.

The New Hire Checklist, which is attached on the following page, reflects this process change.

Chicago State University
Office of Human Resources



New Hire Checklist

Employee Name

UID

Campus Address

Supervisor

Extension

Start Date/Contract Date

Orientation Date

CHECKLIST

COMMENTS

- Employment Application
- Resume
- Job Description (Employee and Supervisor must sign a copy and return to HR)
- Offer Letter
- I-9 Form
- Two Forms of Identification
- Background Check
- Personal Data Form
- Benefits Orientation
- W-4 Tax Form
- Declaration of State under the SURS
- Employee Handbook
- Sexual Harassment Policy
- Affidavit of Employee Wage Deduction
- Affidavit of Insurance Coverage
- Confidentiality Agreement
- Computer Usage Policy
- Drug and Alcohol Abuse Policy
- Compliance Training
- Mandated Reporter Training & Certificate
- Ethics Training

Employee Signature: _____

Date: _____

HR Signature: _____

Date: _____

Revised: 7/6/2020

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

CSU FY20-10 NON-COMPLIANCE WITH CYCLIC REVIEW STANDARDS FOR CIVIL SERVICE POSITION DESCRIPTIONS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.30 The Classification Plan; and*
- 3) *Classification Plan Management Procedures Manual, Section 2.2 Job Descriptions.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(1) To approve a classification plan prepared under its direction, assigning to each class positions of substantially similar duties. The Merit Board shall have power to delegate to its Executive Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.

(2) To prescribe the duties of each class of positions and the qualifications required by employment in that class.

Proper administration and communication of position descriptions is a fundamental element in any human resource program and the precursor to many ‘best practice’ human resource policies and procedures, particularly those related to classification plan management and performance evaluation.

Classification Procedures Manual, Section 2.2 Job Descriptions requires that “All job descriptions shall be reviewed and updated at least every three years, including the signatures of the incumbent and supervisor.”

BACKGROUND/CONTEXT:

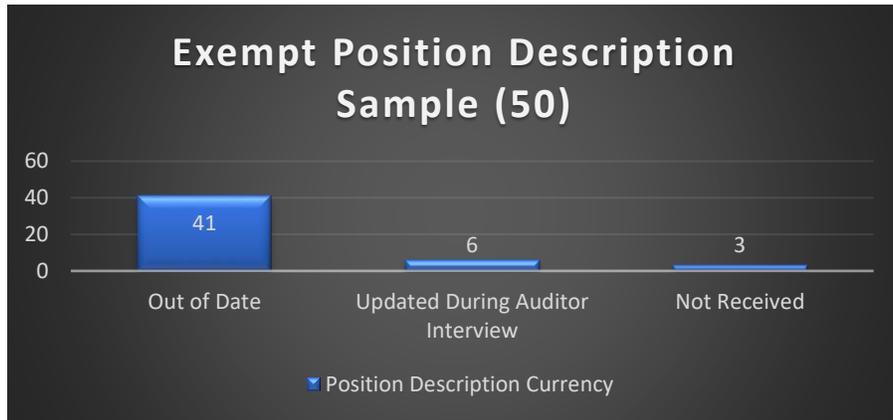
The Governance, Risk, and Compliance Audit process includes both a comprehensive review of all sampled Civil Service position descriptions for proper classification, content, and currency within three years of the beginning of the audit time frame. Civil Service position description reviews for currency and content are sampled and reviewed under the purview of a Category 3 Risk Assessment. The Auditor also evaluates this topic area based upon the extent to which an Employer’s history related to this specific issue impacts the current sampling method and depth of review.

A routine and regular position review program is necessary to properly assign classification designations and accurately validate exemption status. Exemptions are authorized in accordance with current procedures, requiring 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.

CONDITIONS/FACTS:

The Auditor requested a sample of **fifty (50)** Civil Service position descriptions for compliance with the cyclic review standard. **Forty-four (44)** of those position descriptions were either not received by the auditor or did not appear to be updated or reviewed for currency or content in accordance with established guidelines. In fact, the only current position descriptions resulted from Auditor authentication when interviewing sampled incumbent positions during the on-site visit. The following chart articulates the status of the position description documents sampled for this audit period:



CAUSE/SOURCE OF CONDITION:

The Employer did not follow routine protocols in securing current and updated position descriptions assuring compliance with the cyclic review standard.

EFFECT/IMPACT:

The cornerstone of proper position control management lies with the proper administration and maintenance of the position description. This is a fundamental necessity. Incomplete or outdated position descriptions may cause misunderstandings between supervisors and employees related to performance expectations. Incomplete or outdated descriptions do not allow for the proper designation of work duties and can result in erroneous classification designations that unfavorably affect employee compensation and seniority benefits. Incomplete or outdated position descriptions may also compromise the integrity of the performance review and disciplinary process.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

The University System Office has historically emphasized that the cornerstone of position control management lies with the proper administration and maintenance of the position description. Consistent with the Classification Plan Management Procedures Manual, it is requested that the Employer immediately establish new business processes that ensure cyclic position review standards are applied for every position in accordance with required guidelines. These new procedures shall include emphasis in

communication to the campus community regarding the fundamental importance of the establishment of a periodic position development and review process for all exempt positions. Employees directly responsible for performing the position description review and analysis should be routinely informed and trained regarding classification plan management concepts, specifically those directly related to the exemption authorization process and corresponding procedures.

Therefore, with respect to the position descriptions contained in the sample, it is requested that the Employer immediately begin authenticating these documents between incumbents and their respective supervisors. As necessary, the Employer is requested to contact the incumbent and departmental representatives for all positions and begin authenticating position descriptions for accurate content and communication that demonstrates compliance with applicable procedures. The Auditor will provide the Employer with those six (6) position descriptions authenticated during the on-site visit.

It should be noted that on March 3, 2020, the Employer provided a new position description workflow to the Auditor for suggestions in capturing an electronic method of validation between incumbents and supervisors. Upon review of the Employer's new workflow, the Auditor made some additional recommendations such as, documented checks to review authenticated position descriptions by human resources and confirming that actual communication of the job duties occurred between incumbents and supervisors. Solely utilizing an electronic mechanism for authenticating position descriptions does not go far enough in the validation of these documents.

Even though classification specifications include standard job components, such as Minimum Acceptable Qualifications (MAQ's) and appropriate knowledge, skills, and abilities, position description documents should also include these components. These components are considered necessary for communicating performance expectations and completion of the duties in a given position. Following that process, the Employer shall provide the new process to the Auditor, to include a timeline for the complete review and update of all Civil Service position descriptions on campus. This plan shall be provided in response to this finding as part of the Employer's Administrative Response.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. The Office of Human Resources has implemented a new process which will result in the annual review and validation of position descriptions for all active Civil Service employees within the University. The process consists of having the incumbent and the incumbent's supervisor validate the current job description during the annual performance review process.

The incumbent and the supervisor will be asked to provide a signed and dated job description to the Office of Human Resources. During this year's performance review process, there is a coronavirus pandemic, which will limit the ability for supervisors and employees to conduct performance evaluations in person. Therefore, due to the current coronavirus pandemic, the Office of Human Resources will accept electronic signatures due to the fact that most employees do not have access to a printer and/or scanner while working remotely. Also, due to the pandemic, the annual performance review deadline has been extended to September 30, 2020. Therefore, the Office of Human Resources will be able to provide documentation of authenticated position descriptions to SUCSS on or before **October 31, 2020**.

In addition to the annual review of job descriptions as part of the performance evaluation process, job descriptions will also now be reviewed at the time of hire by the new employer and his/her supervisor. Both parties must confirm the accuracy, make any necessary revisions, sign a copy of the job description, and submit it to the Office of Human Resources for review. The New Hire Checklist reflects this process change.

ADDITIONAL AUDITOR COMMENTS:

The Auditor confirms receipt of the New Hire Checklist in response to this finding, which is included on Page 51 of this report and will not be duplicated here.

Chicago State University
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-11 IDENTIFICATION OF ERRORS IN PAYROLL AND HRIS SYSTEMS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36b(2); and*
- 2) *Illinois Administrative Code (Code), Section 250.140 Delegation of Authority and Responsibilities.*

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

As stated in Section 250.140 of the Code, “Delegation of Authority and Responsibilities”:

- d) “Delegation to the Executive Director. The Executive Director is delegated the authority and responsibility to effectively administer the State Universities Civil Service System in accordance with the Act and this Part. The Executive Director may be further delegated the authority and responsibility to act on behalf of the Merit Board by specific authorization or direction of the Merit Board.”
- e) “Delegation by the Executive Director. The Executive Director is authorized to delegate to the employer, and to members of the University System staff, such duties and responsibilities as, in his/her judgment, are appropriate and effective for the efficient administration of the service of the System to its constituent institutions and agencies.”
- f) “Conduct of Audits. The Executive Director shall conduct ongoing audit programs of all Civil Service operations at all places of employment for the purpose of assuring compliance with the Act and this Part and for improving the programs of personnel administration of its constituent employers and shall prepare, distribute, and follow up on audit reports in accordance with Merit Board direction.”

In this respect, the Governance, Risk, and Compliance Audit 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

BACKGROUND/CONTEXT:

As with any audit, source documents are used as evidence that a specific transaction occurred and are required for the purpose of demonstrating compliance. Section 250.140 of the Illinois Administrative Code provides the authority and jurisdiction for the University System to conduct and implement specific processes for the conduct of the Governance, Risk, and Compliance Audit.

General record keeping standards are evaluated as an overall observation in relation to other processes that directly impact the Civil Service employment process and are reviewed under the purview of a Category 1 Risk Assessment. As previously referenced in this report, these vital record keeping standards are basic and fundamental to any employment process and can have a direct impact on the Auditor’s ability to adequately perform compliance activities. As a practical matter, this category of importance indicates that the topic is audited for compliance during every cycle at each Employer location.

CONDITIONS/FACTS:

As part of the FY2020 Governance, Risk, and Compliance Audit for Chicago State University, the review of compensation and associated payroll documents are standard with respect to ensuring compliance in several different areas of the overall audit process. Upon receipt of the Civil Service payroll document, the Auditor noted several errors, including inaccurate hire and appointment dates and Civil Service classification titles that do not exist. These discrepancies are noted as follows:

Hire Date Listed After Appointment Date

██████████	Date of Appointment: 10/16/2017	Date of Hire: 11/1/2017
██████████	Date of Appointment: 8/1/2012	Date of Hire: 8/16/2012
██████████	Date of Appointment: 11/16/2010	Date of Hire: 3/1/2012
██████████	Date of Appointment: 6/18/2008	Date of Hire: 6/18/2018
██████████	Date of Appointment: 11/5/2007	Date of Hire: 11/12/2007
██████████	Date of Appointment: 12/16/2006	Date of Hire: 12/18/2006
██████████:	Date of Appointment: 7/1/2005	Date of Hire: 7/8/2005
██████████	Date of Appointment: 7/1/2005	Date of Hire: 7/8/2005
██████████	Date of Appointment: 7/16/2000	Date of Hire: 7/17/2000
██████████	Date of Appointment: 7/17/1999	Date of Hire: 12/1/2015

Inaccurate Civil Service Title

██████████	Associate
██████████	Nectrician
██████████	Nectrician
██████████	Associate
██████████	Nectrician, Foreman
██████████	Associate
██████████	Associate

██████████ Nectrician

It should also be noted that **two (2)** classification titles listed in the payroll document require Change-In-Title transactions in accordance with a University System classification plan change resulting in deletion of the class and communicated through a Final Status Notice dated May 22, 2015:

██████████ Administrative Coordinator for User Services
██████████ Administrative Coordinator for User Services

<https://www.sucss.illinois.gov/documents/csn/2222.pdf>

CAUSE/SOURCE OF CONDITION:

The majority of these errors were likely caused by a lack of attention to detail, typographical error or, in some instances it is possible there is a misunderstanding of data entry requirements in the campus payroll and HRIS systems. In the two instances listed above, personnel transactions related to changes in classification title were not updated or documented.

EFFECT/IMPACT:

These deficiencies were completely avoidable and provides additional evidence regarding the overall personnel administration and poor record-keeping practices within the Human Resource Office. The inability to establish and maintain a sound program of personnel administration with respect to Civil Service employment has significant consequences in many other associated areas and, if left unchecked, increases liability risk for the Employer.

As previously noted in this report, poor record-keeping practices had a direct impact on several other employment requirements, such as the inability to demonstrate whether candidates were referred correctly and/or employed within fundamental statutory guidelines. In addition, incorrect dates of employment and appointment can have a significant impact on seniority calculations, and consequently, employee rights.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

The Auditor requests that immediate corrections be made within the payroll and HRIS systems that house personnel information. Proper classification titles are required for use within these systems, for example, a Nectrician is an Electrician; and an Associate can apply to several different custom classes within the Civil Service classification plan, for example, Human Resource Associate, Grants and Contracts Associate, and Information Technology Support Associate, just to name a few, so the Civil Service title in the payroll system should accurately reflect the proper classification title. This should be simple to complete. In addition, the Auditor requests documentation that the two Change-In-Title transactions have been completed no later than **May 31, 2020**.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. In accordance with the recommendation, the classification titles that were identified as inaccurate have been updated in Banner. In addition, the Change-in-Title transaction for [REDACTED] has been completed. On June 4, 2020, [REDACTED] was notified of his new job title of Business/Administrative ARS Associate. The effective date of the change was June 16, 2020. For the other Change-in-Title request, please note that [REDACTED] resigned on September 20, 2019. Supporting documentation for all these items was included in the response.

The Draft Audit Report also identifies a list of employees who appear to have hire dates after appointment dates. This was due to human error and a misunderstanding of the information requested. The appointment date was provided from payroll data that indicates the first date of the payroll period of a new hire, not the new hire's start date or hire date. This date cannot be changed in our payroll system. In the future, the University will provide the employee's actual appointment date into the status civil service position and not the payroll system appointment date.

Chicago State University
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-12 ERRONEOUS PRACTICES RELATED TO PERMISSIVE REMOVAL OF NAMES FROM REGISTERS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.60(h)(8) and (9) Permissive Removal of Names From Registers, and*
- 3) *Employment and Separations Procedures Manual, Section 1.4, Maintenance of Active Registers for Status Appointments.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(7) To cause to be established, from the results of examinations, registers for each class of positions in the classified service of the University System of the persons who shall attain the minimum mark fixed by the Merit Board for the examination; and such persons shall take rank upon the registers as candidates in the order of relative excellence as determined by examination, without reference to priority of time of examination.

Section 250.60(h) of the Illinois Administrative Code outlines the provisions for Permissive Removal of Names From Registers, which states “[T]he employer may remove the names of candidates from original entry registers and from promotional registers for the reasons set forth in subsection (h). The reasons include, but are not limited to, the following:

- (8) Failure of a candidate to be selected for employment **after four referrals** for a status appointment in the same class.
- (9) When candidates' names have remained on original entry registers for **two consecutive years following date of most recent examination**, or following date of original entry restoration on the basis of service or seniority...”

Accurate maintenance and proper use of registers are a fundamental requirement and an essential element in the standardized civil service employment process. This responsibility has been delegated to the DER and is reviewed through the biennial audit process.

BACKGROUND/CONTEXT:

All registers are prepared and maintained to become part of the examination record file of the University System. Other electronic records and record development processes may be utilized in this respect as well. The University System has traditionally recommended that the Employer utilize a “register clearing”

process at regular intervals to remove candidates from the active register in accordance with the regulatory guidelines noted above related to permissive removal of names from employment registers.

CONDITIONS/FACTS:

The Employment and Separation Procedures Manual, Section 1.4 outlines this register maintenance process in a clear and concise manner. The University System Office has strongly encouraged Employers to develop institutional policies regarding the various permissive options for removal of candidates from registers.

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 asked to provide their policy related to the permissive removal of names from registers, which was provided to the Auditor in the response indicated below:

“We do not have a written policy governing removal of a [sic] names from the registry. We have a best practice of removing individuals after three referrals without selection.”

As previously referenced in the standards section of this finding related to the permissive removal of names from registers, the Code allows permissive removal after four (not three) referrals. The early removal of names of registers for this purpose is unauthorized and does not lend itself to being a best institutional practice.

CAUSE/SOURCE OF CONDITION:

The Employer has not established or maintained adequate business processes to properly manage employment registers as procedurally required. Please refer also to a finding related to employment registers previously in this report.

Organizationally, the Human Resource Department at Chicago State University lacks the knowledge and experience necessary to properly administer the various statutory requirements outlined in the Act, Code, and System Procedures related to the employment and human resource management of Civil Service employees.

EFFECT/IMPACT:

The failure to establish and maintain a sound program of personnel administration with respect to Civil Service employment has significant consequences and increased liability risk for the Employer. Candidates permissively removed from the register without being allowed every opportunity to being referred for a position denies the rights of candidates the consideration for employment in the classification their examination score and ranking provides. Permissive removal of names from registers requires those candidates that have been removed to retake the examination if they want to be considered for employment, and also requires the Employer to open the classification again for testing.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

The Auditor requests that the Employer immediately develop proper register maintenance policies that are compliant and consistent with regulatory requirements.

When a candidate is removed from or restored to a register, the date and rule reference must be recorded on the register by the Employer. Documentation or other information verifying those register actions shall be maintained in the Employer's file. Accordingly, the Employer shall provide a list of those candidates that have been removed inappropriately from the register under permissive removal rules and guidelines consistent with their response to the Auditor in the DER Questionnaire. The Employer will also be required to restore those candidates back to the appropriate register from which they were removed and notify those candidates of their removal in error. The Employer's actions in this respect must be outlined in their Administrative Response to this audit finding.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation of developing a proper register maintenance policy; however, it does not agree or admit that candidates have been inappropriately removed as reflected.

In order to determine whether or not an employee was improperly removed, the Office of Human Resources must conduct a thorough review and assessment of the current registers. Due to the magnitude of this review, the Office of Human Resources is developing a 6-month plan to address the current register list and to determine whether or not a candidate was improperly removed. The Office of Human Resources is requesting a deadline of **December 1, 2020** to address the concerns regarding possible previous candidate removals. However, the Office of Human Resources has developed a written policy to go into effect immediately. This new policy will be adhered to prior to removing any candidates from any register effective July 6, 2020. The written policy is attached on the following page:



CHICAGO STATE UNIVERSITY

CSU Office of Human Resources Policy on Permissive Removal of Names of Registers (Civil Service)

Effective July 6, 2020

Chicago State University may remove the names of candidates from original entry registers and from promotional registers for the reasons set forth below. Names of candidates may be removed from reemployment registers for the reasons set forth below. The reasons include, but are not limited to, the following:

1. Failure of a candidate to report for work without good cause for three consecutive business days after accepting a status or a temporary appointment.
2. Leaving the service of any employer served by the University System by an employee with a status appointment.
3. Failure to reply to Chicago State University within seven calendar days immediately following an offer of a status or a temporary appointment by a Chicago State University.
4. Notice by postal authorities of their inability to locate the candidate at his/her last known address, or verbal notice from the owner or occupant of the premises that the candidate is no longer at his/her last known address and that no forwarding address has been provided.
5. Failure of a candidate, upon request, to furnish written evidence of availability for employment.
6. Failure, without reasonable cause, to reply to Chicago State University or appear for an interview within three business days, when Chicago State University's Office of Human Resources has mailed either a notice of a vacancy in a status or temporary position or a letter of interest to the candidate's last known address.
7. Upon the candidate's acceptance of a promotion.
8. Failure of a candidate to be selected for employment after four referrals for a status appointment in the same class.
9. When candidates' names have remained on original entry registers for two consecutive years following date of most recent examination, or following date of original entry restoration on the basis of service or seniority.
10. In classifications identified by the Executive Director of the State Universities Civil Service System and approved by the Merit Board, upon the expiration of the designated timeframe specified in a formal position vacancy posting

Notification Process of Candidates of Removal of Names from Registers

Candidates whose names are removed from reemployment registers, promotional registers, and/or original entry registers in accordance with the State Universities Civil Service System rules shall be notified in writing by the Chicago State University and provided the reason for the removal. The written notice shall be delivered by either email or mail sent to the candidate's last known address as listed in the University's system of record.

ADDITIONAL AUDITOR COMMENTS:

The Auditor acknowledges the Employer's response to the removal of names from employment registers. The University System approves the Employer's request to review all of the employment registers to determine whether employees were removed improperly and will follow up with the Employer no later than the requested deadline of **December 1, 2020**.

Chicago State University
Final Audit Report

Risk Assessment Category 1 Finding
Recommendation and Administrative Response

CSU FY20-13 FAILURE TO CONFIRM VALIDITY OF ASSIGNED AND APPROVED SPECIALTY FACTORS

CRITERIA/STANDARDS:

- 1) *State Universities Civil Service Act (Act), Section 70/36d; and*
- 2) *Illinois Administrative Code (Code), Section 250.60(d); and*
- 3) *Classification Plan Management Procedures Manual, Section 4 Specialized Positions.*

Section 36d of the Act describes the powers and duties of the Merit Board, specifically related to the following provisions:

(1) To approve a classification plan prepared under its direction, assigning to each class positions of substantially similar duties. The Merit Board shall have power to delegate to its Executive Director the duty of assigning each position in the classified service to the appropriate class in the classification plan approved by the Merit Board.

(2) To prescribe the duties of each class of positions and the qualifications required by employment in that class.

Section 250.60(d) of the Illinois Administrative Code states, “[T]he Executive Director may authorize specialized position certification for eligible register candidates or incumbents who possess special and identified qualifications that are job-related requirements for a specific position as well as being fully qualified for the class.”

As a matter of standard procedure, Employers must request from the Executive Director that a specialty factor be attached to any designated position in a classification, whether currently filled or vacant. However, in certain instances, Employers are allowed to assign specialty factors to positions assigned in specific Custom Classifications and formal authorization is not required.

Authorization for a specialty factor attachment to a position is based on a thorough review of the position duties/responsibilities and its relationship to the specialty factor. Positions for which specialty factors have been approved shall be reviewed at least once every three years, to ensure that such specialized requirements continue to exist. All specialty factor designations are subject to audit review.

BACKGROUND/CONTEXT:

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 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)*.

CONDITIONS/FACTS:

As defined in the Classification Plan Management Procedures Manual, a specialty factor is a specific knowledge, skill, ability, or other work characteristic assigned to a position and is considered basic to and essential for satisfactory performance of the duties and responsibilities of the position and a prerequisite to appointment in the position. Specialty Factor designations are subject to audit review, either through conducting inquiries regarding those specialty factors that are several years old, inspecting position control records, or through reviewing the position descriptions for which specialty factors are assigned.

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 asked if there is a standard review of approved specialty factors for positions to determine if they remain valid, and if so, whether position descriptions and position control records are updated regularly to add, revise, or delete specialty factors. The Employer's response consisted of the following:

"Yes, when a vacancy is created, we review the current job description and contact the department to verify if the specialty factor still applies. Yes, position descriptions are updated to reflect this. Records are reviewed and updated at the time of vacancy to address the specialty factor."

On January 24, 2020, the Auditor submitted a request to the Employer regarding the currency and location of a sample of five (5) positions, listed below, that obtained Executive Director approved specialty factors. The Employer simply did not respond to the Auditor's request.

<u>Position</u>	<u>Date of Approval by System Office</u>
Customer Service Representative I	08/13/2009
Program Services Specialist	08/13/2009
Program Coordinator	08/27/2009
Program Advisor	10/30/2009
Human Resource Assistant Manager	11/21/2012

The purpose for selecting these sampled positions is primarily due to the date of approval, however it is also due, in some cases, to position and classification plan changes that have occurred over the last 7-10 years. Additionally, other Change-In-Title transactions may have also occurred as a result of those changes, which would have required additions, revisions or deletion of applicable specialty factors.

CAUSE/SOURCE OF CONDITION:

The Employer has not demonstrated that adequate business processes exist to properly manage specialty factors as procedurally required.

EFFECT/IMPACT:

The inability to demonstrate the validity of assigned and approved specialty factors in designated positions may lead to the referral of an unqualified candidate from the register in the classification of a

position as may be needed to satisfactorily perform the requirements of the job, or in a layoff situation, the improper displacement of an employee.

FINDING(S) FROM PREVIOUS AUDIT(S):

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

RECOMMENDATION TO EMPLOYER:

The Auditor was unable to test the Employer's response in the DER Pre-Audit Questionnaire by ensuring that specialty factors are updated and maintained consistent with their questionnaire response, or validate that changes are accurately reflected in the applicable position description and position control record.

The information requested by the Auditor must be submitted, with updated position descriptions (as referenced and requested previously in this report), and included with the Employer's administrative response to this Draft Audit Report.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University agrees with the recommendation. The Office of Human Resources has reviewed the documentation for the specialty factors requested 7-10 years ago. The Office of Human Resources located copies of the "Request for Specialty Factor(s)" for the Customer Service Representative I, Human Resource Assistant Manager, Program Coordinator, Program Services Specialist and Program Advisor positions.

After further review, the Office of Human Resources is requesting that the specialty factors be deleted for the following positions: Human Resource Assistant Manager, Customer Service Representative I, and Program Services Specialist. The position of Human Resource Assistant Manager was never posted or filled; therefore, the specialty factor was never utilized. The position of Customer Service Representative I is currently vacant. The position of Program Services Specialist also is currently vacant. The most recent Program Advisor hires were hired into different positions and departments from the program advisor request made in 2009.

Based upon a review of the most recent data, it appears that specialty factors requested above, which originally occurred in 2009 have not been used in the recent hiring practices for the current vacant positions due to the fact that the recent vacancies have occurred in a different department from the requests listed above. The Office of Human Resources will submit new Requests for Specialty Factor(s) as needed and will develop process and procedures to ensure a review at least once every three years, to ensure that such specialized requirements continue to exist.

The Office of Human Resources will be requesting updated job descriptions for all employees as part of the 2020 Performance Review process. After those documents are submitted, the Office of Human Resources will submit job descriptions for the currently utilized positions of Program Advisor and Program Coordinator for this audit finding. The anticipated date of updated job description submission is **October 31, 2020**.

Chicago State University
Final Audit Report

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

**CSU FY20-14 NON-COMPLIANCE WITH AUDITOR REQUEST TO CONDUCT CIVIL SERVICE
EMPLOYEE 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, however; only if it is addressed in a timely manner.

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.

Employee

██████████

Current Classification

Business/Administrative Associate

Recommended Classification

Program Coordinator or
Program Director

During the incumbent's interview, [REDACTED] indicated that she demonstrates complete oversight for the Gwendolyn Brooks Center and has assumed several additional duties since the Center downsized in 2011. [REDACTED] indicated that she previously requested a position audit, but was informed that she does not direct, implement, or create programs for the Center. The incumbent further indicated during her interview with the Auditor that she oversees all events, evaluates the goals of the Center consistent with university goals, pursues proposals, secures event venues, conducts all research for the events, and manages budget for the Center.

The Auditor noted that the last position description update was February 2010, which is noncompliant with the cyclic review standards outlined in the Classification Plan Procedures Manual. The incumbent indicated during her interview with the Auditor that she had not ever reviewed her position description. While the incumbent indicated that she had requested a position audit at some point in the last few years, the Employer did not report this reclassification request to the Auditor, which appears to indicate that the Employer did not complete this task at any point during the audit time frame.

During the post audit conference and as outlined in the Preliminary Observation Report, the Auditor requested that the Employer conduct a desk audit of this position with a deadline of **February 28, 2020**. As of the date of this report, the Employer has not submitted this information to the Auditor. Given the potential for future budget cuts state wide, where layoffs could occur, it is critical that employees be properly classified in accordance with established procedures.

CAUSE/SOURCE OF CONDITION:

The work in the position reviewed by the Auditor has evolved with the employee and the needs of the department. Following the post audit conference, the Employer did not conduct the required desk audit for this position pursuant to the Auditor's request.

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 requested that the Office of Human Resources review this position for proper classification assignment and report their findings to the Auditor no later than **May 31, 2020**.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

The University disagrees with the recommendation. Nevertheless, at the request of the Auditor, on June 12, 2020, the Office of Human Resources conducted a desk audit for [REDACTED], and [REDACTED] was notified of the results of the desk audit on June 23, 2020.

As explained in the memorandum sent to [REDACTED], the desk audit confirmed that she has been correctly classified as a Business/Administrative Associate. While the position does oversee the fiscal management of the business operation, it does not have fiscal authority regarding funding. Further, the position does not supervise any status employees; rather, the position only supervises work-study students and one graduate student throughout the academic year. The position also does manage volunteers for events held at the Gwendolyn Brooks Center. Although the position has added additional events and programs to the Center, these additions have not changed the scope or nature of the job to result in reclassification.

ADDITIONAL AUDITOR COMMENTS:

On July 14, 2020, the incumbent contacted the Auditor to inquire further regarding the desk audit decision rendered by the Employer. The incumbent conveyed to the Auditor that, when she discussed her duties and responsibilities with Human Resources, that the questions being asked gave her the impression that a classification decision had been predetermined before the desk audit interview. Additionally, [REDACTED] was uncertain as to whether Human Resources interviewed her supervisor or the Dean regarding the assignment of duties to her position. Based on the Employer's response provided to [REDACTED], and subsequently included as part of the Employer's response to this finding, it remains unclear whether a fully comprehensive desk audit was conducted.

The letter to [REDACTED], dated June 23, 2020, simply stated the following:

After assessing all information provided to the auditor on June 12, 2020 and based on the scope of the current classification, it's concluded that you are functioning in the correct classification. The position does oversee the fiscal management of the business operation, however, it does not have fiscal authority regarding funding. The position does not supervise any status employees besides work-study student(s) and one graduate student throughout the academic year. The position does manage volunteers for events held at the Gwendolyn Brooks center. Although the position has added additional event and programs to the Center throughout its tenure the scope or nature of the job has not changed to result in reclassification. The audit is based on function and scope of duties and not volume or quality of work.

If you have any specific questions regarding the audit feel free to contact me.

Upon receipt of this classification determination, [REDACTED] contacted the classifier in Human Resources and communicated her disagreement with the desk audit findings and requested information regarding next steps. [REDACTED] stated that she received confirmation from the classifier that the matter was being referred to the Chief Culture and Talent Officer at CSU, Ms. Lindsay Hamilton.

At the time of contact from [REDACTED], the Auditor had not yet received the Employer's Institutional Corrective Action Plan response to the Draft Audit Report Findings. The Auditor advised [REDACTED] to wait until the FY2020 Final Audit Report was issued, after which time the Auditor would contact her regarding a formalized Audit Appeal process, if necessary, to the Executive Director for the University System.

As a matter of information, the Auditor did receive the Employer's Corrective Action Plan response on July 10, 2020; and based on this response, it appears the Designated Employer Representative disagrees with the finding, as well as the campus appeal request for reclassification by the incumbent. However, formal notification of the DER decision in this respect must be provided to [REDACTED]. As of the date of this report, it appears the desk audit process has been completed on campus, however, the University System Office will be contacting the Employer regarding any potential audit appeal in the coming days. In

order to confirm the authenticity of the desk audit process on campus, the DER will be required to submit the classifier's complete desk audit notes, documentation of interviews with the incumbent and supervisor, an in-depth review of revised position description duties, a comparison with other similar classifications, and a thorough job analysis.

Chicago State University
Final Audit Report

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

CSU FY20-15 INACCURATE EXEMPTION AUTHORIZATION APPLIED

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 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. This initial determination includes a thorough and comprehensive review of the position description in order to determine which category of exemption the position represents.

BACKGROUND/CONTEXT:

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.

Employee headcounts for each category of exemption are reported to the University System Office on a quarterly basis, with the information for each Employer published at the agency website. In order to provide accurate information in this respect, the Employer must not only be knowledgeable about the proper categorization of positions, but do so in order to adequately justify the exemption from the Act.

CONDITIONS/FACTS:

Through a standard review of payroll, position description documents, and on-site interviews with various exempted employees, the Auditor determined that **five (5)** positions/titles listed in Table 2 below may be more appropriately categorized as exempt under Section 36e(2), 36e(3), or Section 36e(4) of the Act:

Table 2

<i>FY2020 Governance, Risk, and Compliance (GRC) Audit</i>			
<i>Recommended Exemption Category Determinations</i>			
<i>Employee</i>	<i>Position Number</i>	<i>Position Title</i>	<i>Recommended Exemption Category</i>
██████████	A22400	<i>Chief of Staff & External Affairs</i>	36e(3)
██████████	A31600	<i>Acting Director of Facilities</i>	36e(3)
██████████	A53200	<i>Director of Career and Experiential Opportunity</i>	36e(4)
██████████	A43200	<i>Assistant Director, Latino Resource Center</i>	36e(4)
██████████	A45700	<i>Director</i>	36e(4)

CAUSE/SOURCE OF CONDITION:

According to the Employer’s payroll documents, position description documents submitted for the audit, and incumbent interviews, the exemption category for each position was coded incorrectly based on specific definitions outlined in the Exemption Procedures Manual.

EFFECT/IMPACT:

The inability to establish and maintain adequate position management protocols that properly update, analyze and evaluate exempt position descriptions, including a determination of the proper exemption standard to be applied, can lead to unauthorized exemption authorizations, utilization of inappropriate employment protocols, and non-compliance with the Act, Code and Procedures.

FINDING(S) FROM PREVIOUS AUDIT:

Through a standard review of payroll documents, the Auditor determined that **sixty-eight (68)** positions/titles identified may be more appropriately categorized as exempt under either Section 36e(2) or 36e(4) of the Act. *[Finding Code CSU FY11-05, pages 20-21].*

RECOMMENDATION TO EMPLOYER:

We recommend that the University complete a review of the position descriptions for the positions listed in **Table 2** above in order to validate the exemption authorization applied and update their payroll records accordingly. This review should specifically include an evaluation of the type of exemption authorization

to be applied in each instance. These updates are to be completed prior to the Employer submitting their next *Quarterly Report of Employee Served* information to the System Office.

EMPLOYER'S ADMINISTRATIVE RESPONSE - PROVIDED BY LINDSAY HAMILTON, CHIEF CULTURE AND TALENT OFFICER:

CSU agrees with the recommendation. In accordance with the Auditor's recommendation, CSU has completed review of the position descriptions for the positions listed in this finding. CSU has updated its payroll records and completed the necessary updates, which will be reflected in the next Quarterly Report of Employee Served information to the System Office. The updates are also reflected in the chart provided in the Employer's response.

**State Universities Civil Service System
Chicago State University
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Appendix A

**Unauthorized "Override" Payments
Paid to Civil Service Employees**

Employee Name	Title	Start Date	End Date	Amount of Salary Override	Purpose of Salary Override
██████████	Assistant Chief Plant Operating Engineer	7/1/2015	6/30/2016	\$24,999.96	Negotiation of Fuel Contractors and Energy Savings
██████████	Payroll Manager	5/1/2019	10/31/2019	\$15,000.00	60% of Payroll Specialist II Duties Due to Resignation
██████████	Program Services Specialist	11/1/2017	2/28/2018	\$14,225.00	Administrator of the TANF Scholarship Program
██████████	Program Services Specialist	11/1/2017	2/28/2018	\$14,225.00	Administrator of the TANF Scholarship Program
██████████	Procurement Officer Supervisor	5/1/2019	8/31/2019	\$13,868.00	Interim Director of Purchasing
██████████	Executive Secretary	9/16/2016	8/30/2017	\$10,000.00	Performed Additional Duties per the President
██████████	Procedures System Analyst	2/16/2017	12/15/2017	\$10,000.00	Assumed Temporary Director Duties for Office of Undergraduate Admissions
██████████	Assistant Payroll Manager	5/1/2019	10/31/2019	\$10,000.00	40% of Payroll Specialist II Duties Due to Resignation
██████████	Procurement Officer Supervisor	7/1/2018	7/15/2018	\$8,692.00	BEP Certification for Vendor
██████████	Medical Office Specialist	7/1/2019	6/30/2020	\$8,000.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Medical Office Assistant	7/1/2019	6/30/2020	\$8,000.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Manager of Sports Facilities	7/1/2018	6/30/2019	\$7,500.00	Game Operations and Supervision of Twenty-Seven (27) Employees
██████████	Manager of Sports Facilities	7/1/2017	6/30/2018	\$7,500.00	Managing Game Day Staff and College Work Study Students
██████████	Program Services Specialist	7/1/2015	12/31/2015	\$7,112.50	Administrator of the TANF Scholarship Program
██████████	Program Services Specialist	1/1/2016	6/30/2016	\$7,112.50	Administrator of the TANF Scholarship Program
██████████	Program Services Specialist	10/1/2016	11/30/2016	\$7,112.50	Administrator of the TANF Scholarship Program
██████████	Program Services Specialist	12/1/2016	1/31/2017	\$7,112.50	Administrator of the TANF Scholarship Program
██████████	Procurement Officer Supervisor	9/1/2019	10/31/2019	\$6,934.00	Interim Director of Purchasing
██████████	Program Services Specialist	1/1/2015	6/30/2015	\$6,500.00	Administrator of the TANF Scholarship Program
██████████	Assistant Program Director	9/1/2018	2/28/2019	\$6,028.02	College of Pharmacy Learning Specialist Role While the Specialist Was on Leave - Prep for Accreditation Visit
██████████	Human Resource Representative	7/1/2018	4/30/2019	\$5,000.00	Assist With Payroll Operations
██████████	Network Engineer I	6/15/2018	6/24/2019	\$5,000.00	Assumed Various Telecommunication Activities
██████████	Manager of Sports Facilities	7/1/2016	6/30/2017	\$5,000.00	Performed Director of Recreation and Assistant Athletic Facilities Game Day Operations
██████████	Executive Secretary	9/1/2016	8/31/2017	\$4,800.00	Coordinated Fall 2016 & Spring 2017 Honors Commencement Activities
██████████	Police Telecommunicator	7/1/2019	6/30/2020	\$4,772.00	LEADS Coordinator Duties
██████████	Academic Contract Supervisor	1/1/2017	8/31/2017	\$4,584.00	Performed Academic Contract Supervisor Duties During Vacancy
██████████	Police Telecommunicator	7/1/2015	6/30/2016	\$4,199.64	LEADS Coordinator Duties
██████████	Police Telecommunicator	7/1/2017	6/30/2018	\$4,199.64	LEADS Coordinator Duties

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██████████	Program Assistant	1/12/2015	5/15/2015	\$4,000.00	Manage Grant Project
██████████	Executive Secretary	6/1/2018	8/2/2018	\$3,800.00	Special Projects per University President
██████████	Training & Development Specialist I	10/1/2016	12/15/2016	\$3,500.00	Revamped Job Location and Development (JLD) Program
██████████	Organizational [sic] Development Specialist	1/1/2017	5/15/2017	\$3,500.00	Job Location and Development for Job Placement and Training for Students
██████████	Training & Development Specialist	10/1/2016	12/15/2016	\$3,500.00	Revamped Job Location and Development (JLD) Program
██████████	Organizational [sic] Development Specialist	1/1/2017	5/15/2017	\$3,500.00	Job Location and Development for Job Placement and Training for Students
██████████	Medical Office Assistant	8/16/2016	12/15/2016	\$3,068.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Medical Office Specialist	3/16/2019	6/30/2019	\$3,000.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Human Resource Representative	9/1/2018	2/28/2019	\$3,000.00	Assist With Benefits Escalations and Processing
██████████	Medical Office Assistant	3/16/2019	6/30/2019	\$3,000.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Program Assistant	7/1/2019	9/15/2019	\$3,000.00	Project Administrator Coverage
██████████	Program Coordinator	1/16/2018	3/31/2018	\$2,500.00	Duties Performed Outside of Job Description and Assisting Faculty With Federal and Research Grants
██████████	Executive Secretary	9/1/2017	12/15/2017	\$2,500.00	Coordinated Fall 2017 Commencement Activities
██████████	Account Technician III	6/5/2019	7/31/2019	\$2,400.00	Handling Travel Reimbursements/Reporting
██████████	Medical Office Specialist	8/16/2016	12/15/2016	\$2,400.00	Student Health Insurance Coverage and Assistance (Filling a Vacancy)
██████████	Program Assistant	8/1/2015	8/31/2015	\$2,000.00	Manage Grant Project
██████████	Program Coordinator	1/1/2017	3/31/2017	\$2,000.00	Duties Performed Outside of Job Description and Assisting Faculty With Federal and Research Grants
██████████	Program Services Specialist	11/16/2014	12/31/2014	\$1,931.00	Administrator of the TANF Scholarship Program
██████████	Program Services Specialist	1/12/2015	5/31/2015	\$1,931.00	Administrator of the TANF Scholarship Program
██████████	Training & Development Specialist I	6/1/2017	6/30/2017	\$1,666.66	Developing Instructional Materials for Job Location and Development (JLD) Program
██████████	Human Resource Manager	6/16/2017	6/30/2017	\$1,666.00	Review Budgets, Oversee Recruitment Projects for JLD Program/Renewal and Maintenance of Activity Records
██████████	Instructional Development Specialist	2/16/2015	6/30/2015	\$1,620.00	Faculty Development Specialist Duties During Vacancy
██████████	Manager of University Cashiering Operations	6/5/2019	7/31/2019	\$1,600.00	Assist Accounts Payable With Year-End Close, Invoice and DPV Processing
██████████	Office Support Specialist	3/1/2019	5/31/2019	\$1,487.00	School Counseling for K-12 Preparatory Students
██████████	Assistant Payroll Manager	7/1/2019	10/31/2019	\$1,433.32	40% of Payroll Specialist II Duties Due to Resignation
██████████	Program Assistant	12/1/2018	6/30/2019	\$1,070.00	Oversee Data Management System for Student Requirements (College of Pharmacy)
██████████	Program Assistant	6/26/2017	7/26/2017	\$1,000.00	Temporary Administrator for DIA Grant
██████████	Program Assistant	10/1/2015	10/31/2015	\$1,000.00	Manage Grant Project
██████████	Program Assistant	11/1/2015	11/30/2015	\$1,000.00	Manage Grant Project/Project Administrator Training
██████████	Customer Service Assistant	5/1/2019	6/11/2019	\$1,000.00	Supplied Outstanding Support to the Interim CIO and Other Instruction, Training, Etc.
██████████	Program Assistant	5/12/2019	12/31/2016	\$806.88	Worked in Residence Hall Ensuring Safety and Security of Athletic Students

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██████████	Program Coordinator	7/16/2018	8/31/2018	\$800.00	Generated Purchase Orders for Various Faculty and Worked With Vendors for Merchandise Quotes
██████████	Program Assistant	7/1/2019	8/15/2019	\$800.00	Assist Interim Purchasing Director With Purchasing Operations Due to Vacant Position
██████████	Police Officer	7/1/2015	12/31/2015	\$750.00	CSU Police Department Detective
██████████	Police Sergeant	7/1/2015	12/31/2015	\$750.00	CSU Police Department Detective
██████████	Program/Student Advisor	5/12/2019	5/19/2019	\$384.72	Worked Residence Hall Help Desk
██████████	Police Telecommunicator	7/1/2016	6/30/2017	\$349.97	LEADS Coordinator Duties
██████████	Police Telecommunicator	7/1/2017	6/30/2018	\$349.97	LEADS Coordinator Duties
██████████	Medical Office Specialist	5/12/2019	5/19/2019	\$213.25	Worked in Residence Hall Ensuring Safety and Security of Athletic Students

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Appendix B

***Exempt Appointments
Position Descriptions That Correspond to Civil Service Classification Specifications***

Employee Name	Title	Date of Employment	Date of Appointment in Position	Position Number	Annual Salary	Recommended Civil Service Classification Options
██████████	Assistant Director of Finance Services	8/8/2011	2/16/2018	A30700	\$85,860.00	Bursar or Comptroller Series
██████████	O/S Programmer Specialist	4/3/2000	6/16/2018	A52700	\$105,552.00	Information Technology Manager/Administrative Coordinator
██████████	Admission Counselor	9/15/2019	9/15/2019	A52000	\$32,800.00	Admissions and Records Series
██████████	Assistant to the Director	11/1/2018	11/1/2018	A60400	\$42,000.00	Office Support Series or Administrative Aide
██████████	Admissions and Recruitment Coordinator	11/1/2014	7/1/2019	A50300	\$33,800.00	Admissions and Records Series
██████████	Assistant to the Director, Board Relations	7/16/2018	7/16/2018	A57600	\$49,500.00	Administrative Assistant or Administrative Aide
██████████	Program Specialist	1/24/2005	7/16/2018	A57900	\$40,000.00	Grants and Contracts Associate
██████████	Assistant to the Chairperson	6/4/2018	6/4/2018	A66600	\$40,000.00	Office Support Series or Administrative Aide
██████████	Simulation/Computer Lab Coordinator	7/9/1999	11/1/2018	A41000	\$50,000.00	Instructional Development Specialist
██████████	Graduate Student Evaluation Specialist	11/1/2010	9/16/2019	A46000	\$55,140.00	Graduate School Specialist
██████████	Scholarship/VA Coordinator	12/1/1989	7/11/2007	A53400	\$47,736.00	Program Coordinator or Program Director
██████████	Senior Employment Coordinator	7/16/2007	9/16/2018	A60200	\$64,464.00	Human Resource Associate or Human Resource Series
██████████	Coordinator of Alumni Affairs	9/16/2015	8/1/2019	A46300	\$55,140.00	Assistant Director of Alumni Relations or Program Coordinator
██████████	Assistant Director, Marketing & Media Relations	8/1/2019	8/1/2019	A45100	\$75,000.00	Marketing Associate or Program Director
██████████	Student Employment Coordinator	8/11/2003	9/1/2018	A43900	\$50,500.00	Human Resource Associate or Financial Aid Series
██████████	Tutoring Coordinator	3/16/2013	5/1/2015	A45600	\$39,660.00	Program Coordinator or Program Assistant
██████████	Coordinator, Veterans and Military Service	5/24/2017	10/1/2019	A62200	\$47,004.00	Program Coordinator or Program Director
██████████	Implementation Support Specialist	4/16/2009	1/3/2018	A67100	\$57,996.00	Instructional Development Specialist
██████████	Assistant Director of Talent Relations	2/4/2018	2/4/2018	A43100	\$75,000.00	Human Resource Associate or Human Resource Series
██████████	Lab Support Specialist	11/16/2016	11/16/2016	A66300	\$41,616.00	Undetermined - Research Technologist Series
██████████	Assistant Director, Latino Resource Center	7/15/2019	7/15/2019	A43200	\$49,440.00	Program Coordinator or Program Director
██████████	Career Development Specialist	10/1/2019	10/1/2019	A52900	\$50,000.00	Program/Student Advisor
██████████	Technology Specialist	2/3/2014	1/3/2017	A59000	\$64,504.00	Information Technology Support Associate or Information Technology Technical Associate
██████████	Admissions and Recruitment Coordinator	2/16/2005	7/1/2019	A58500	\$33,800.00	Admissions and Records Series
██████████	Senior Associate Athletic Director	2/16/2017	10/1/2018	A49200	\$62,424.00	Program Director
██████████	Customer Relationship Management Specialist	11/17/2008	12/17/2018	A62800	\$62,500.00	Information Technology Support Associate or Information Technology Technical Associate
██████████	Learning Specialist	8/16/2004	1/1/2019	A58300	\$52,008.00	Program/Student Advisor, Program Director, or Program Coordinator
██████████	Grant Program Specialist	1/16/2014	2/1/2016	A57400	\$37,636.00	Grants and Contracts Associate
██████████	Grant Coordinator	11/11/2003	6/16/2017	A51500	\$72,100.00	Grants and Contracts Associate

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***Exempt Appointments
Position Descriptions That Correspond to Civil Service Classification Specifications***

Employee Name	Title	Date of Employment	Date of Appointment in Position	Position Number	Annual Salary	Recommended Civil Service Classification Options
██████████	TRIO Support Specialist	5/16/2018	5/16/2018	A56400	\$32,888.00	Program Coordinator, Program Assistant, Office Support Series, or Administrative Aide
██████████	Assistant Director of Government Affairs and Community Relations	8/1/2019	8/1/2019	A40300	\$60,000.00	Program Coordinator or Program Director
██████████	NCAA Operations Coordinator	10/16/2019	10/16/2019	A57800	\$40,008.00	Budget Analyst Series, Business/Administrative Associate, or Accounting Associate
██████████	Career Development Specialist	5/16/2018	5/16/2018	A50100	\$40,404.00	Program/Student Advisor
██████████	Special Assistant To	7/16/2019	7/16/2019	A50400	\$65,004.00	Development Officer, Administrative Assistant, or Administrative Aide
██████████	Assistant Athletics Director for Media Relations	N/A	N/A	A55200	\$60,000.00	Marketing Associate
██████████	Financial Aide Service Specialist	10/1/2013	7/1/2018	A53100	\$41,500.00	Admissions and Records Series (Based on PD) or Financial Aid Series (Based on Title)
██████████	Assistant Director	7/16/1999	6/1/2018	A48200	\$49,440.00	Program Coordinator or Program Director
██████████	Enrollment Specialist for Transfer Students	6/27/2005	4/1/2019	A62500	\$42,000.00	Program/Student Advisor
██████████	Senior Project Coordinator/Programmer	11/16/2017	11/16/2017	A51200	\$92,928.00	Information Technology Manager/Administrative Coordinator

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Appendix C

Extra Help Employees Exceeding the 900-Hour Rule

Employee Name	Position Title	Department	Beginning Appointment Date	Ending Appointment Date	Employee Hours Worked
██████████	Extra Help/Office Support	Grants - Intercollegiate Athletics	9/18/2017	8/15/2018	920.50
"	"	"	9/18/2017	8/15/2018	265.00
					1185.50
██████████	Extra Help/Office Support	Grants - Intercollegiate Athletics	9/16/2018	7/15/2019	75.00
"	"	"	9/16/2018	7/15/2019	947.00
					1022.00
██████████	Extra Help/Clerical	Recreation Fitness Center	10/16/2018	12/18/2019	1126.00
██████████	Extra Help/Clerical	Grants - College of Health Science	1/16/2016	4/30/2016	1238.50
██████████	EH/Account Technician I	Financial Affairs	9/18/2017	7/31/2018	864.85
"	"	"	9/18/2017	7/31/2018	311.00
					1175.85
██████████	EH/Account Technician I	Financial Affairs	9/1/2018	6/30/2019	894.30
"	"	"	7/1/2019	6/30/2020	1085.75
					1980.05
██████████	Extra Help/Clerical	Bursar/Cashier	8/1/2015	1/31/2016	928.00
██████████	Extra Help/Clerical	Grants - Provost/VP Academic Affairs	11/16/2016	5/31/2017	1799.40
"	"	"	11/16/2016	5/31/2017	242.00
					2041.40
██████████	Extra Help/Office Support	Grants - Provost/VP Academic Affairs	7/1/2017	5/15/2018	151.00
"	"	"	9/1/2017	5/15/2018	449.00
"	"	"	5/16/2018	9/15/2018	227.00
"	"	"	10/1/2018	10/31/2018	85.00
					912.00
██████████	Extra Help/Office Support	Grants - Provost/VP Academic Affairs	9/16/2019	5/31/2020	979.00
██████████	Extra Help/No Description	Grounds	12/1/2016	6/30/2017	270.00
"	"	"	12/1/2016	6/30/2018	629.50
"	"	"	12/1/2017	6/30/2018	776.25
					1675.75
██████████	Extra Help/Clerical	University Police	4/16/2015	6/30/2015	1704.00
██████████	Extra Help/Clerical	Student Health Service	9/18/2017	3/31/2018	661.10

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Extra Help Employees Exceeding the 900-Hour Rule

Employee Name	Position Title	Department	Beginning Appointment Date	Ending Appointment Date	Employee Hours Worked
"	"	"	9/18/2017	3/31/2018	299.95
					961.05
██████████	Extra Help/Clerical	Student Health Service	7/1/2018	4/15/2019	303.00
"	"	"	7/1/2018	4/15/2019	935.00
					1238.00
██████████	Extra Help/Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	615.00
"	"	"	8/16/2018	6/30/2019	841.00
					1456.00
██████████	Extra Help/Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	618.00
"	"	"	8/16/2018	6/30/2019	854.50
					1472.50
██████████	Extra Help/Clerical	Bursar/Cashier	1/1/2015	6/30/2015	770.50
"	"	"	1/1/2015	6/30/2015	458.00
"	"	"	7/1/2015	11/15/2015	466.00
					1694.50
██████████	Extra Help/Clerical	Learning Assistance Center	8/16/2014	6/30/2015	484.00
"	"	"	7/1/2015	4/30/2016	575.00
					1059.00
██████████	Extra Help/Office Support	Student Financial Aid	7/1/2017	6/30/2019	427.50
"	"	"	7/1/2017	6/30/2019	540.00
"	"	"	7/1/2017	6/30/2019	517.50
"	"	"	7/1/2019	6/30/2020	525.00
					2010.00
██████████	Extra Help/Support	Bookstore	4/16/2015	9/30/2015	764.50
"	"	"	10/16/2015	4/15/2016	307.50
					1072.00
██████████	Extra Help/Clerical	Bursar/Cashier	7/1/2015	4/30/2016	462.00
"	"	"	7/1/2015	4/30/2016	483.75
					945.75
██████████	Extra Help/Skilled	Parking	8/16/2016	5/18/2017	1753.50
██████████	EH/Account Technician I	Financial Affairs	9/18/2017	6/30/2018	900.00
"	"	"	9/18/2017	6/30/2018	382.50

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Employee Name	Position Title	Department	Beginning Appointment Date	Ending Appointment Date	Employee Hours Worked
					1282.50
██████████	EH/Account Technician I	Financial Affairs	8/1/2018	6/30/2019	424.00
"	"	"	8/1/2018	6/30/2019	963.00
"	"	"	7/1/2019	6/30/2020	752.50
					2139.50
██████████	Extra Help/Clerical	Student Health Service	11/16/2018	6/30/2019	589.00
"	"	"	11/16/2018	6/30/2019	692.00
					1281.00
██████████	Extra Help/Office Support	Grants - Student Financial Aid	1/17/2017	6/30/2017	654.00
"	"	"	7/1/2017	4/2/2019	363.00
"	"	"	7/1/2017	4/2/2019	557.00
"	"	"	5/1/2019	4/1/2020	771.00
"	"	"			2345.00
██████████	Extra Help/Office Support	Intercollegiate Consolidated	11/1/2017	3/31/2018	837.00
"	"	Intercollegiate Athletics	11/1/2017	6/30/2018	229.00
"	"	Intercollegiate Consolidated	5/1/2018	6/30/2018	120.00
"	"	"	7/1/2018	11/15/2018	673.00
					1859.00
██████████	Extra Help/Office Support	Recreational Facilities	10/16/2019	6/30/2020	960.00
██████████	Extra Help/Skilled	Shuttle Service	5/18/2017*	8/21/2017	309.00
"	"	Parking	8/21/2017	4/30/2018	809.00
"	"	Shuttle Service	8/21/2017	4/30/2018	421.00
					1539.00
██████████	Extra Help/Skilled	Parking	8/16/2018	5/31/2019	429.50
"	"	"	8/16/2018	5/31/2019	797.50
					1227.00
██████████	Extra Help/Office Support	Grants - Provost/VP Academic Affairs	2/1/2018	8/31/2018	845.00
"	"	"	9/1/2018	11/5/2018	273.00
"	"	"	12/1/2018	5/15/2019	614.00
"	"	"	12/1/2018	5/15/2019	614.00
"	"	"	6/1/2019	8/31/2019	486.00
					2832.00
Scott, Aisha	Extra Help/Clerical	Grants - Provost/VP Academic Affairs	9/1/2016	5/15/2017	1146.00

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Employee Name	Position Title	Department	Beginning Appointment Date	Ending Appointment Date	Employee Hours Worked
"	"	"	9/1/2016	5/15/2017	66.00
					1212.00
██████████	Extra Help/Office Support	Grants - Provost/VP Academic Affairs	7/1/2017	8/4/2017	110.00
"	"	"	9/1/2017	5/15/2018	196.00
"	"	"	9/1/2017	5/31/2019	91.00
"	"	"	6/16/2018	7/31/2018	120.00
"	"	"	9/1/2018	12/31/2018	92.00
"	"	"	9/1/2018	5/31/2019	128.00
"	"	"	1/1/2019	5/31/2019	86.00
"	"	"	6/16/2019	7/31/2019	128.00
"	"	"	10/1/2019	5/31/2020	78.00
					1029.00
██████████	Extra Help/Clerical	Non-Appropriated IT Support	3/16/2015	11/2/2015	970.50
██████████	Extra Help/Skilled	Parking	9/1/2017	5/15/2018	1110.00
"	"	"	9/1/2017	5/15/2018	536.50
					1646.50
██████████	Extra Help/Skilled	Parking	10/1/2018	6/15/2019	1022.50
██████████	Extra Help/Clerical	Grants - Provost/VP Academic Affairs	11/16/2016	5/15/2017	1992.00
"	"	"	11/16/2016	5/15/2017	62.00
					2054.00
██████████	Extra Help/Office Support	Grants - Provost/VP Academic Affairs	9/18/2017	7/31/2018	920.75
"	"	"	1/16/2018	4/2/2019	960.00
					1880.75
██████████	EH/Account Technician I	Financial Affairs	9/1/2018	6/30/2019	497.70
"	"	"	9/1/2018	5/15/2019	896.20
"	"	"	7/1/2019	6/30/2020	563.25
					1957.15
██████████	Extra Help/Clerical	LIS - Administrative Services	11/16/2017	4/30/2018	639.00
"	"	"	11/16/2017	4/30/2018	101.00
"	"	"	5/1/2018	6/30/2018	196.00
					936.00
██████████	Extra Help/Office Support	Library Support Service	8/16/2018	6/30/2019	632.00
"	"	"	8/16/2018	6/30/2019	1116.00

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Employee Name	Position Title	Department	Beginning Appointment Date	Ending Appointment Date	Employee Hours Worked
					1748.00
██████████	Extra Help/Skilled	Parking	8/16/2015	4/30/2016	732.00
"	"	"	8/16/2018	4/30/2016	470.50
					1202.50
██████████	Extra Help/Skilled	Parking	8/16/2016	5/18/2017	535.50
"	"	"	8/16/2016*	5/18/2017	269.50
"	"	"	8/21/2017	5/31/2018	702.00
"	"	"	8/21/2017	5/31/2018	382.00
					1889.00
██████████	Extra Help/Skilled	Parking	8/16/2018	5/15/2019	440.50
"	"	"	8/16/2018	5/15/2019	689.50
"	"	"			1130.00
██████████	Extra Help/Clerical	Bursar/Cashier	1/1/2015	6/30/2015	446.80
"	"	"	7/1/2015	11/15/2015	625.75
					1072.55
██████████	Extra Help/No Description	Grounds	12/1/2016	6/30/2017	1278.00
██████████	Extra Help/No Description	Grounds	12/1/2017	6/30/2018	800.00
"	"	"	12/1/2017	6/30/2018	608.75
"	"	"	12/1/2017	6/30/2018	49.75
					1458.50
██████████	Extra Help/No Description	Grounds	12/3/2018	6/30/2019	911.10
██████████	Extra Help/Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	690.50
"	"	"	8/16/2018	6/30/2019	1074.00
					1764.50
██████████	Extra Help/Clerical	Grounds	11/16/2015	4/15/2016	965.50
██████████	Extra Help/Clerical	Recreation Fitness Center	2/1/2019	12/31/2019	756.00
	Extra Help/Office Support	Intercollegiate Consolidated	9/16/2019	6/30/2020	931.00
					1687.00

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Extra Help Positions Exceeding the 900-Hour Rule

Position Number With Suffix	Employee	Position Title	Department	Beginning Timeframe	Ending Timeframe	Total Hours Worked
X53794-01	██████████	Office Support	Grants - Intercollegiate Athletics	9/18/2017	8/15/2018	1185.50
X53794-03	██████████	Office Support	Grants - Intercollegiate Athletics	9/16/2018	7/15/2019	1022.00
XH0502-01	██████████	Clerical	Recreation Fitness Center	10/16/2018	12/18/2019	1126.00
XH3160-68	██████████	Skilled	Parking	11/1/2014	10/31/2015	787.50
"	"	"	"	11/1/2014	10/31/2015	95.00
"	"	"	"	12/1/2015	4/15/2016	330.50
						1213.00
X52911-02	██████████	Clerical	Grants - College of Health Science	1/16/2016	4/30/2016	1238.50
XH0212-05	██████████	Account Technician I	Financial Affairs	9/18/2017	7/31/2018	1175.85
XH0212-10	██████████	Account Technician I	Financial Affairs	9/1/2018	6/30/2019	894.30
"	"	"	"	7/1/2019	6/30/2020	567.10
						1461.40
XH0214-06	██████████	Clerical	Bursar/Cashier	8/1/2015	1/31/2016	928.00
X51862-03	██████████	Clerical	Grants - Provost/VP Academic Affairs	11/16/2016	5/31/2017	2041.40
X51998-22	██████████	Office Support	Grants - Provost/VP Academic Affairs	12/1/2018	5/15/2019	703.00
"	"	"	"	9/16/2019	5/31/2020	703.00
						1406.00
XH0712-01	██████████	Clerical	University Police	4/16/2015	6/30/2015	1704.00
XH3900-07	██████████	Clerical	Student Health Service	9/18/2017	3/31/2018	961.05
XH3900-08	██████████	Clerical	Student Health Service	7/1/2018	4/15/2019	1238.00
XH3421-03	██████████	Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	1456.00
XH3421-04	██████████	Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	1472.50
XH0545-03	██████████	Clerical	Chemistry and Physics	9/16/2015	6/30/2016	350.00
"	"	"	"	11/1/2016	6/30/2017	625.00
						975.00
X51986-03	██████████	Office Support	Student Financial Aid	7/1/2017	6/30/2019	945.00
XH0317-04	██████████	Clerical	Network Services	12/16/2014	5/15/2015	360.00

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"	"	"	"	7/1/2015	11/30/2015	720.50
						1080.50
XH0317-17	██████████	Clerical	Non-Appropriated IT Support	6/16/2018	12/31/2018	799.00
"	"	"	Network Services	7/2/2018*	12/31/2018	674.00
						1473.00
X51999-01	██████████	Office Support	Grants - Provost/VP Academic Affairs	1/16/2018	4/2/2019	1140.00
"	"	"	"	10/16/2018	5/15/2019	234.00
						1374.00
XH0214-02	██████████	Clerical	Bursar/Cashier	1/1/2015	6/30/2015	874.75
"	"	"	"	7/1/2015	11/15/2015	625.75
						1500.50
XH3160-03	██████	Skilled	Parking	8/16/2016	5/18/2017	1753.50
"	"	"	"	8/21/2017	5/31/2018	262.00
						2015.50
XH0212-06	██████████	Account Technician I	Financial Affairs	9/18/2017	6/30/2018	1282.50
XH0212-09	██████████	Account Technician I	Financial Affairs	8/1/2018	6/30/2019	1387.00
XH3900-10	██████████	Clerical	Student Health Service	11/16/2018	6/30/2019	1281.00
X51986-04	██████████	Office Support	Grants - Student Financial Aid	7/1/2017	4/2/2019	920.00
XH3421-73	██████████	Office Support	Intercollegiate Consolidated	11/1/2017	3/31/2018	837.00
"	"	"	Intercollegiate Athletics	11/1/2017	6/30/2018	229.00
"	"	"	Intercollegiate Consolidated	5/1/2018	6/30/2018	120.00
						1186.00
XH3718-01	██████████	Office Support	Recreational Facilities	10/16/2019	6/30/2020	960.00
XH3160-09	██████████	Skilled	Parking	8/21/2017	4/30/2018	809.00
"	"	"	Shuttle Service	"	"	421.00
						1230.00
XH3160-22	██████████	Skilled	Parking	8/16/2018	5/31/2019	1227.00
X51999-14	██████████	Office Support	Grants - Provost/VP Academic Affairs	12/1/2018	5/15/2019	1228.00
X51862-01	██████████	Clerical	Grants - Provost/VP Academic Affairs	9/1/2016	5/15/2017	1146.00
XH3322-22	██████████	Clerical	Non-Appropriated IT Support	3/16/2015	11/2/2015	970.50
XH3160-16	██████████	Skilled	Parking	9/1/2017	5/15/2018	1646.50
XH3160-19	██████████	Skilled	Parking	10/1/2018	6/15/2019	1022.50

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X51862-04	Sokoya, Jamiu	Clerical	Grants - Provost/VP Academic Affairs	11/16/2016	5/15/2017	2054.00
XH0212-07	██████████	Office Support	Grants - Provost/VP Academic Affairs	9/18/2017	7/31/2018	920.75
X51999-01	██████████	Office Support	Grants - Provost/VP Academic Affairs	1/16/2018	4/2/2019	960.00
XH0212-01	██████████	Account Technician I	Financial Affairs	12/1/2014	6/3/2015	508.00
"	"	"	"	7/16/2015	12/31/2015	737.00
						1245.00
XH0212-11	██████████	Account Technician I	Financial Affairs	9/1/2018	6/30/2019	497.70
"	"	"	"	9/1/2018	5/15/2019	896.20
						1393.90
XH3901-01	██████████	Office Support	Library Support Service	8/16/2018	6/30/2019	1748.00
XH3160-12	██████████	Skilled	Parking	8/21/2017	5/31/2018	1084.00
XH3160-24	██████████	Skilled	Parking	8/16/2018	5/15/2019	1130.00
XH0708-05	██████████	Extra Help/No Description	Grounds	12/1/2016	6/30/2017	1278.00
XH0708-19	██████████	Extra Help/No Description	Grounds	12/3/2018	6/30/2019	911.10
XH3421-85	██████████	Office Support	Intercollegiate Consolidated	8/16/2018	6/30/2019	1764.50
XH0713-47	██████████	Clerical	Grounds	11/16/2015	4/15/2016	965.50