Supplemental Audit

TEMPORARY STAFFING SERVICES PROGRAM (TSSP)

Report No. SC-10-13

February 2011
TOM VANI
Vice Chancellor – Business and Administrative Services

Re:  Internal Audit Report No. SC-10-13 – Temporary Staffing Services Program (TSSP)

Dear Tom:

Internal Audit & Advisory Services (IAS) has completed a review of the overall effectiveness and assessed the adequacy of controls over the Temporary Staffing Services Program (TSSP) as requested by the Campus Controller. A copy of the report is attached.

The TSSP was generally functional; campus departments were able to obtain temporary help and were in compliance with the most critical cardless account related procedures and authorizations. However, issues were identified which could have an adverse affect on the campus if not addressed in a timely manner. This included the applicability and impact of SHR policies on Spherion employees working for extended periods of time on campus; the lack of central or dedicated oversight of campus departments and the contract; coordination over program roles and accountabilities; controls for acquiring temporary staffing services; and controls around card monitoring and US bank reconciliations.

Financial Affairs and Staff Human Resources were responsive in acknowledging and working through observations identified during the review and agreement was reached on all of the report’s recommendations. Normal followup activity will be performed to verify completion of the agreements.

We would like to express our appreciation to the Controller’s Office and Staff Human Resources for their cooperation and assistance throughout this engagement.

Sincerely,

Barry Long, Director
Internal Audit & Advisory Services

Attachment
Tom Vani  
February 4, 2011  
Page Two

Distribution:

Director Bono

UCSC Audit Committee:

Executive Director Beaston  
Vice Chancellor Delaney  
Vice Chancellor Doyle  
Assistant Vice Chancellor Lew  
Vice Chancellor Margon  
Vice Chancellor McGinty  
Assistant Vice Chancellor Moreno  
Vice Chancellor Murphy  
Assistant Chancellor Sahni  
UCOP SVP Vacca
TEMPORARY STAFFING SERVICES PROGRAM (TSSP)

Report No. SC-10-13

February 2011

Approved

Brigitte Desouches
Senior Auditor

Barry Long, Director
Internal Audit & Advisory Services
# TABLE OF CONTENTS

I. EXECUTIVE SUMMARY ..................................................................................................2  

II. INTRODUCTION  
   A. Purpose ...................................................................................................................3  
   B. Background ..........................................................................................................3  
   C. Scope ..................................................................................................................4  
   D. Positives ............................................................................................................4  

III. OBSERVATIONS REQUIRING MANAGEMENT CORRECTIVE ACTION  
   A. Applicability of SHR Policies ..............................................................................5  
   B. Central & Departmental Monitoring of the TSSP .................................................7  
   C. Obtaining Temporary Staffing Services .................................................................11  
   D. Temporary Staffing USBank Cardless Account Management ..........................14  

APPENDIX A: Suggestions for Improving Effectiveness of the TSSP ......................16
I. EXECUTIVE SUMMARY

Internal Audit & Advisory Services (IAS) has completed a review of the overall effectiveness and adequacy of controls over the Temporary Staffing Services Program (TSSP) as requested by the Campus Controller.

The TSSP was generally functional at this time as campus departments were able to obtain temporary help and were in compliance with the most critical cardless account related procedures and authorizations. However, we identified issues and control weaknesses which could have an adverse effect on the campus if not addressed in a timely manner as follows:

A. The applicability of campus SHR polices on Spherion provided labor was not clear and needed to be determined. The relevance and impact, if any, of the 1,000 hour threshold or other campus limited appointment policies on the Spherion workforce should be evaluated and if found applicable, will require the implementation of enhanced monitoring routines.

B. There was a lack of central oversight and monitoring over campus departments using Spherion services and the University Agreement with Spherion. Within departments, the TSSP was fragmented in administrative and recruitment management with a lack of coordination and some confusion regarding program roles and accountabilities.

C. Controls for acquiring temporary staffing services were weak as campus staff human resources and business policies were not properly applied. Procedures were not in place to ensure a proper request process and separation of duties were not uniformly followed.

D. Controls around monitoring card validity, training prior to obtaining a cardless account, and account dollar limits could be improved. While USBank reconciliations were generally performed, controls over the process could be strengthened.

Observations and related management corrective actions are described in greater detail in section III of this report. A summary of the results from our review of Campus Controller’s Office initial concerns is described in Appendix A.
II. INTRODUCTION

A. Purpose

The purpose of this review was to evaluate the overall effectiveness of the TSSP, analyze potentially significant risks, assess the adequacy of existing controls and verify the compliance with University and Campus policies and procedures.

B. Background

Up until six years ago, the TSSP was administered by Imaging, Printing, Mail, and Temporary Services (IPMTS), a unit specialized in providing temporary staffing services to campus by receiving and processing campus requests. The Purchasing unit paid the temporary staffing agencies and recharged the departments for their cost.

In 2004, IPMTS was incorporated into University Business Services (UBS). Since then its involvement with the temporary staff process was gradually reduced with the intention to remove as much intermediary as possible and to outsource the temporary staffing function. Campus departments placed their requests directly to Spherion, who was, at the time, the main campus temporary staffing vendor. The new Spherion Online Exchange, installed in 2006, allowed campus departments to place orders online.

In September 2008, the University of California entered into a five year agreement with Spherion binding the two entities with conditions of purchase and delivery of services.

In the summer of 2009, a supplier settlement process introduced the use of a new cardless account system through USBank, eliminating the old recharge system. Cardless accounts were linked to Spherion via USBank and could only be charged for Spherion invoices. The administration of the TSSP became divided between campus departments and Spherion with the intent of there no longer being a need for central campus office oversight or administration. Procurement and Business Contracts (P&BC) was expected to manage only the Spherion vendor relationship as it related to compliance with contract terms.

Staff Human Resources (SHR) stayed removed from the temporary staffing process on Campus Counsel’s advice; Purchasing, now Procurement & Business Contract (P&BC), no longer responsible for recharges, kept the role of contract oversight; Financial Administrative Services & Transactions (FAST) Pro-card Administration assumed responsibility for administering the cardless accounts used to settle Spherion invoices.
Such a succession of changes in the program, added to unit reorganization, resulted in the elimination or diffusion of central accountabilities. Campus departments and Spherion are now left solely responsible for effectively running the program and ensuring compliance with UC and campus policies and procedures. At this time no central office is actively managing the program.

C. **Scope**

During this review:
- The overall TSSP management structure was evaluated;
- Controls over the establishment, usage and monitoring of the USBank cardless account and activities were reviewed;
- Controls over temporary recruitment conducted through Spherion account was assessed;
- Compliance with selected aspects of the UC/Spherion Agreement (Agreement) was tested;
- Vendor compliance with established program procedures and controls over account setup, maintenance, and closure processes was assessed;
- Separation of duties in departments were reviewed for both financial and recruitment processes; and,
- Compliance with UC and campus policies was tested.

We conducted interviews and limited testing in 15 different departments from academic and administrative divisions: School of Engineering, Physical & Biological Sciences, Student Affairs, Business & Administrative Services, and Information Technology Services. We used five selection criteria: volume of usage, recent increase in usage, varied sizes of operations, employment over a thousand hours, and use of “payrolling” practice.

We also interviewed Spherion Santa Cruz Branch Manager and the three central units involved in the program: P&BC, SHR and FAST.

D. **Positives**

- Process and controls around obtaining the Temporary Staffing USBank Cardless Account by departments were found adequate;
- In all departments reviewed, staff actions with budgetary impact, including temporary employees, must be requested to and authorized by Senior Officials;
- The Spherion Enterprise Time Capture (ETC) system was found adequate for temporary effort recording, approval and invoicing;
• According to campus Office for Diversity, Equity and Inclusion, Spherion’s performance in minority outreach seems acceptable; and,
• Campus management and staff within departments and units tested were cooperative and helpful.

III. OBSERVATIONS REQUIRING MANAGEMENT CORRECTIVE ACTION

A. Applicability of SHR Policies

The applicability of campus SHR polices on Spherion provided labor was not clear and needed to be determined.

The relevance and impact, if any, of the 1,000 hour threshold or other campus limited appointment policies on the Spherion workforce should be evaluated and if found applicable, will require the implementation of enhanced monitoring routines.

Specific guidelines on availability and use of the Limited Appointment option and the risk of the “Payrolling” practice are needed.

Comments:
1,000 Hours Threshold
There is an expectation that contract temporary employees (Spherion) are not directly subject to the UC Policy on Limited Appointment found in the Personal Policy for Staff Members (PPSM - 3. Types of Appointment), which states:

“a limited appointment shall be designated as a career appointment when the incumbent has attained 1,000 hours of qualifying service in any 12 consecutive months without a break in service of at least 120 consecutive calendar days”

However, because of concerns with union grievances, fair hiring practice, diversity of workforce and dual employment liability, it would appear to be prudent to ensure that there is no legal precedence requiring the university to treat Spherion contract employees as limited employees, nor the need to maintain the temporary workforce time assignment under 1,000 hours. From a labor relations perspective, when using temporary agencies workforce for long periods of time, there is a perception that the university is circumventing its own policy. There is no clear guidance in this area. One link to the SHR website on the TSSP webpage warns that “it is inappropriate to utilize temporary services as a means of avoiding a limited employee’s conversion to career status”. It is not known whether or not stronger written instructions to stay under 1,000 hours of employment are needed at this time. Discussions with campus legal counsel suggested that the longer a Spherion employee works in the same position, side by side with the same university
employees or supervisor, the greater the risk of the university losing in a legal claim to university employee benefits, if challenged. Legal counsel also indicated that exceeding a threshold of six months in the same position is generally considered a minimum threshold to be considered. As such, campus standards for length of temporary agency assignment was not provided or monitored. An estimated twenty five percent of the active Spherion workforce in the spring quarter had exceeded the 1,000 hour a year threshold. The impact of using Spherion labor rather than campus Limited Appointments in relation to human resources policy non-compliance is not known at this time.

Spherion sends a monthly report to campus SHR showing the hours worked per employee for a rolling 12 months period. This tool allows HR Seniors Partners to review the usage of temporary workforce by the units and provides guidance to the units. However, the lack of clarity on the guidance itself and the inaccuracy we have found in the report, renders this process inefficient for now.

In addition, we found that in seven out of the eleven (64 percent) cases of employees kept over 1,000 hours we reviewed, this situation was a direct consequence of budget cuts and lack of permanent positions for critical roles. During the audit we noted an increase of career position openings replacing these lengthy temporary positions. Also, many departments were aware of the 1,000 hours policy for UCSC limited appointments, but were unsure of the applicability on temporary employees.

Limited Appointments and “Payrolling”
Departments have the option to hire through SHR limited appointment. This type of recruitment is more secure because it is subject to regular human resources policies controls, including the 1,000 hour UC policy; however, it does not always fit the department needs. A number of departments that were reviewed (70%) explored the limited appointment option with their HR Senior Partners before beginning the hiring process; the remaining were either not aware of the option, or preferred the flexibility and ease of hiring through Spherion. A “Limited Appointment versus Spherion Preliminary Study Worksheet” with a series of eliminating questions leading the departmental staff to the most appropriate solution could be very useful.

A “payrolled” Spherion staff member on campus is an employee whom the department has instructed to first apply to Spherion to later be hired as staff. This practice is legitimate, is recognized in the agreement, and is widespread on campus. More than 40 percent of campus Spherion employees are hired this way. There are definite advantages for both Spherion and campus staff for using the Payrolling process. However, the use of Payrolling has the potential of creating propitious environments for fraudulent intention.
Agreements:
1. Staff Human Resources will inquire other UC campus human resource organizations for their treatment of contract labor in relation to UC policies and the basis for placing annual hour limits on the use of these outside employees by March 31, 2011.
2. Financial Affairs in association with Staff Human Resources will consult with campus and UC Office of General Counsel in establishing a usage limit over contract labor employees by March 31, 2011.
3. Staff Human Resources will review and capture in a written procedure, its role in advising and monitoring the hours worked by Spherion employees by July 15, 2011.
4. Campus standards for length of assignment to be applied to temporary staff will be clearly stated by Staff Human Resources in writing and available for posting on the TSSP webpage by July 15, 2011.

B. Central & Departmental Monitoring of the TSSP

There was a lack of central oversight and monitoring over campus departments using Spherion services and the University Agreement with Spherion. Within departments, the TSSP was fragmented in administrative and recruitment management with a lack of coordination and some confusion regarding program roles and accountabilities.

A minimum level of oversight should be established to ensure the terms of the Agreement are managed and campus departments are operating in accordance to campus policies. Departments would benefit from enhanced coordination of administrative aspects of the program, including the maintenance of a TSSP website which would provide for much needed practical guidance to Spherion workforce users.

Comments:
Centralized Oversight and Administration
When UBS discontinued its central administration, only limited and separated accountabilities were left to P&BC, SHR, and FAST. These central units could not compensate for the lack of centralized TSSP ownership.

P&BC
Responsible for contract formation, interpretation and non-compliance, P&BC oversees the UC/Spherion Agreement like any other of their supplier’s agreements. The Agreement calls for quarterly business reviews with Spherion (4.6.6.), however the meeting with P&BC occurs once a year and covers general aspects of the program, such as usage on campus of temporary employees and high level issues or
processes to be improved. We believe once a year monitoring of the program is insufficient and does not allow for a detailed review of Spherion’s performance.

In addition, until March 2010, P&BC was responsible for Pro-card administration which included administering the Spherion cardless account settlement process.

SHR
SHR was intentionally removed from this program on Campus Counsel’s advice in order to avoid conflict of dual governance with Spherion. Given the high risk issues revealed by this audit, such as possibility of years of missed fingerprinting and non-compliance with other SHR policies, we believe that SHR, if not actively involved in governance, has a role to play in this program.

FAST
Since April 2010, the Financial Affairs FAST Office has been responsible for Pro-card administration which includes administering the Spherion cardless account from settlement process. However the Spherion cardless process does not benefit the central monitoring level given to the Pro-card process, leaving units’ performance in the financial administration of the program largely unchecked.

Campus departments we interviewed communicated a lack of overall central guidance when using Spherion for temporary staff services. Roles and responsibilities were not well understood and departments did not have a resource to address questions.

A key concern among departments surveyed was the lack of monitoring of Spherion service quality. There was no mechanism for departments to report Spherion service quality issues. As a result, the campus and university could not be expected to know the quality of services rendered. A question was raised as to how the university would be able to make the necessary corrections.

In addition, the new invoice payment system through cardless accounts moved the administrative work load from UBS to the campus units and departments who felt the impact of the change. Departments expressed some confusion with the mixture of similarities and differences with the cardless account and the Pro-card Program.

To assist in the understanding of roles and responsibilities in the absence of centralized oversight, P&BC director offered to provide a contact list of names to call for specific questions or problems.

Departmental Monitoring of the Program
We found the TSSP financial and recruitment functions were insufficiently coordinated. There were instances of the Temporary Staff Supervisor
(TSS)/Requestor not knowing who the Primary Contact (PC) or even the Purchasing Card Authorizer (PCA) was, and lack of coordination and departmental negligence left unchecked.

According to the roles described in the program guidelines, the financial/administrative part is under the coordination and oversight of the PCA. We found most PCAs were unaware of the extent of their responsibilities. A lack of campus liaison with PCAs does not empower them in their role.

We see a need for one person in a department or unit to be given the responsibility to coordinate the financial and recruitment administrative processes, and to be the communication hub in their own environment. The PCA role might be the best placed position to be enhanced.

This position could exercise quality control over both financial and recruitment administrative processes and procedures. In addition to the existing PCA responsibilities, oversight could be provided over procedures such as: the adequate completion of the Staffing Request, the full distribution of Spherion emails to ensure separation of duties, the tracking of both open cardless accounts and Spherion account holders, the timely approval of hours by the TSS and a sufficient dollar limit attached to the cardless account.

Occasional delays in the weekly approval of temporary staff hours by the TSS. Delays in the weekly approval of temporary staff hours creates complication for Spherion and is an illustration of a lack of departmental monitoring. At the end of each week, temporary employees enter their worked hours in Spherion ETC. The TSS then must approve on line the filled time cards, so that ETC can generate its weekly invoices that allow for automatic payment of Spherion by USBank. We found cases of approval delays in some units. If not approved on time, Spherion cannot be paid by USBank but is bound to pay its employees. We believe such instances place the university in an unethical position and departments need to hold timely card approval as a non negotiable.

TSSP Web Page
The TSSP webpage lacked cohesion and important directives. No one was assigned accountable for monitoring the content of the site.

Currently, P&BC website has two access links to the TSSP guidelines: through the P&BC home page and through the Pro-card page with the two links providing different or overlapping information. Regrouping these links into one access point would provide information and guidance to campus users for the entire TSSP program, including its financial and recruitment components.
In addition, there is also a need for a Human Resources section to be created on the TSSP webpage and to be customized to the TSSP process and to the department hiring staff needs. This section would summarize mandatory control points specific to temporary staff hiring.

Lastly, the description of the Pro-card Administrator role on the TSSP webpage includes more responsibilities than what was described to the auditor. These should be removed from the webpage if not applicable.

Records Retention
We found the guidelines for retention of TSSP records insufficient. Campus departments are the TSSP Office of Record and are required to keep the TSSP documentation for 10 years. Some departments were unaware of the 10 year storage requirement and unsure of which document to keep and of the acceptable means of storage. USBank statements were consistently kept, however electronic storage of documents, their shelf life and their accessibility to the entire department were questionable. In general, Spherion recruitment records and communications were not maintained. A list of the records to be kept and guidelines on storage needs to be part of the program guidelines and posted on the TSSP website.

Agreements:
1. Financial Affairs and Staff Human Resources will advise the Vice Chancellor of Business and Administrative Services of the specific resource needs based on the management corrective actions established in this report and consider recommending a level of effort to be assigned to a central administrator over temporary staffing services, if needed by July 15, 2011.

2. Financial Affairs will establish mechanisms to handle TSSP financial-related and Spherion contractual-compliance related matters, which includes the following:
   a. A procedure for departments to report instances of Spherion’s non-performance with contractual terms,
   b. A process for monitoring departmental compliance with applicable TSSP financial control requirements, and
   c. The establishment of a periodic meeting with Spherion to review supplier contract compliance.

   Items a., b., and c., will be completed by October 31, 2011.

3. Staff Human Resources will lead an effort to plan and monitor contract compliance with the proper usage and limits applied to Spherion employees, established in Agreement A.2. by September 30, 2011.
C. Obtaining Temporary Staffing Services

Controls for acquiring temporary staffing services were weak as campus human resources and business policies were not properly applied. Procedures were not in place to ensure a proper request process and separation of duties were not uniformly followed.

Controls over the recruitment of campus temporary workforce need to be strengthened by stronger business, human resources, and administrative controls.

Comments:
Insufficient background checks
UC BUS-49 requests campus to “perform verification of employment history and background checks, including fingerprinting, on cashiers, cash handlers and individuals in other critical positions”. During the audit a temporary employee was hired in the Cashier’s Office without having been fingerprinted. It was further found that Spherion, not being a State run agency, never had the capability of ordering fingerprinting, but could only order background checks through a third party. This places campus in direct violation of University Policy and needs to be addressed immediately.

A Critical Functions Guide on SHR website indicates the background checks needed for different functions. The Spherion manager is not using this guide and we found the background check related questions on the Staffing Request insufficient. It is not clear if some background checks like tubercles bacillus (TB) tests or drug tests are to be monitored by Spherion or on campus. A practical guidance to guide campus and Spherion is needed.

Spherion does not always confirm the completion of its background check to the departments. This step should be included in Spherion email communication to departments.

To reduce the risk associated with ensuring that background checks are provided for Spherion employees, the campus could require sensitive or critical positions to be filled by limited employees only, rather than contract employees.

UC employment polices not followed
Both UC policies, PPSM-21 “Employment of Near Relatives” and UC 2.325 “Reemployment of UC Retired Employees” set standards for the recruitment review and the obtainment of appropriate approvals. We found no guidelines specifically addressing the application of these policies to temporary recruitment and departments are unclear on this subject. This year, three retiree candidates were
hired with no questions asked and one staff persons near relative hiring process was intercepted by senior management.

In addition, the “Reemployment of Retirees” SHR website policy does not reflect the update made by UC Office of President (UCOP) a year ago. The new policy has more stringent conditions and the policy on the SHR website needs to be updated.

Non-compliance with UC/Spherion Agreement
In addition, sections 4.2.5.8 and 4.2.5.11 of the Spherion agreement states several Spherion’s responsibilities with regards to verification of candidate’s possible former UC employment and disclosure to the hiring department. The Spherion manager was not aware of these clauses, the application of which would contribute to identify retirees and former terminations.

Also, Spherion has an obligation to perform reference checks on their own employees. However, we found that often these checks were not done in the case of “payrolled” candidates because these had been referred to Spherion by campus staff in the first place.

Use of the Online Staffing Request mechanism overridden
After opening a Spherion account, the TSS/Requestor is able to request temporary help in filling out a Staffing Request form on line. Procedures have been established to build departmental controls around this form: 1) TSS enters the specifics of the position to be filled and possible request for background checks; 2) provides names and contact information of Primary Contact (PC) who is the USBank accountholder, the Requestor’s Supervisor (STSS) and the Department Authorizer to ensure that funding and hiring authorities are kept informed of the hiring process. Spherion is to include these names in all recruitment emails, thus providing an effective separation of duties.

However, the online Staffing Request form was not always used. Orders and placements could be executed by phone or electronic mail between Spherion manager and the TSS/Requestor only. Such practice undermines not only the separation of duties controls, but also the integrity of the department hiring records, eliminating the possibility to keep records of the job description, qualifications, timing, and of the screenings requested.

In addition, Spherion’s recruitment correspondence by email did not always include a full distribution for reasons such as: 1) the department staff member had not provided the names on the form, 2) Spherion had not entered the names provided in its distribution list, or 3) the form had not been used.
We noted that: 1) the PCA was omitted from the form when we believe this position should be included in the communication loop to be made aware of upcoming temporary hiring; 2) the Staffing Request form could be improved by using the exact campus roles terminology and in naming precise accountabilities such as Budget Approver or Hiring Authorizer rather than Department Authorizer for example.

Agreements:
1. Financial Affairs and Staff Human Resources will evaluate the impact of changing the contract to restrict the use of Spherion employees for campus sensitive or critical positions and provide a recommendation to the Vice Chancellor of Business and Administration by September 30, 2011. Financial Affairs will explore the implication of using alternate contract labor providers and Staff Human Resources will work with campus counsel in confirming the level of background checks needed for each type of critical position.

2. If the determination in recommendation C.1, above is to continue using Spherion employees for critical positions, Staff Human Resources will develop a TSSP background check procedure and post on the TSSP webpage. This procedure will include a precise description of whom, either Spherion or campus, is responsible for performing specific background checks by December 31, 2011.

3. Staff Human Resources will work with legal counsel to determine whether there is potential legal exposure in not providing up front screening of Spherion employees for compliance with UC near relative or retire reemployment policies. If risks are determined to be unacceptable, Staff Human Resources will provide a level of monitoring for compliance with these policies to Spherion new hires by September 30, 2011.

4. Financial Affairs will request Spherion to conduct all aspects of verification of former UC employment stipulated in the Agreement in section 4.2.5.8 & 4.2.5.11 by March 31, 2011.

5. Financial Affairs will request Spherion to include “payrolled” temporary staff in its reference check procedure by March 31, 2011.

6. Staff Human Resources will update the “Rehire of Retiree” webpage on their website with the new data from January 2009 updated UC Policy 2.325 by July 15, 2011.
D. **Temporary Staffing USBank Cardless Account Management**

*Controls around monitoring card validity, training prior to obtaining a cardless account, and account dollar limit could be improved. While USBank reconciliations were generally performed, controls over the process could be strengthened.*

**Comments:**

**Cardless account validity**
There was no central monitoring or departmental procedures for tracking the status of cardless accounts. Campus departments were solely responsible for communicating account changes to Pro-card administrators, without independent verification.

It was also noted that cardless accounts do not have an expiration date.

**Training**
Both PC and PCA are required to take online training before an USBank cardless account can be issued to the PC. We have found that: 1) the online training does not include a mandatory quiz similar to campus Pro-card on line training, 2) the application form is only asking for one confirmation of training completion, instead of one for the PC and one for the PCA, 3) a former application form with no place for training confirmation can still be found in the training section of the P&BC website and needs to be removed, 4) the online training is poor in information related to human resources and background check policies.

**Cardless account limit**
At the time of application for a cardless account, a dollar limit on the account is specified and approved by the department. When the limit is calculated too close to the estimated need it triggers incidents of account overcharge and accumulation of rejected invoices. This happens easily in any five weekly cycle month or when temporary help usage is increased, resulting in administrative confusion and additional work on both sides. Spherion manager has asked the departments to increase their limit; his formula to calculate the optimum dollar limit approximately doubles the original amount. The calculation might be legitimate however it should be checked by campus.

**Reconciliation controls**
The financial reconciliation of temporary employment related transactions should include: 1) the cross reference of Spherion’s invoices with the employee time card in ETC, 2) the reconciliation of the USBank statements with the Spherion invoices, 3) the monthly review of USBank charges on the department ledger.
The USBank statements were being reconciled against the invoices and the ledger reviews were usually done by the PCA; however the Spherion invoices were not consistently cross referenced to the time cards.

In general, separation of duties was maintained and carefully applied, except in two cases where the person doing the reconciliation was TSS and PC, and in cases where no second reviewer was assigned. Often the PCA was the second reviewer and the ledger reviewer. With a precise reconciliation procedure, a second reviewer would only need to follow the sequence of steps indicated to ensure the completion of these steps.

Although a comment on the USBank statement states: “Signatures not required for Temp Staff Cardless accounts”, departments generally included at least one signature. This comment in the USBank statement needs to be removed and the reconciliation should have the signature of both the person doing the reconciliation and the reviewer.

Agreement:
Financial Affairs will periodically remind staff that USBank statement reconciliations are reviewed by a second person other than the one performing the reconciliation. Statements will be signed by both parties by July 15, 2011.

***
APPENDIX A: Suggestions for Improving Effectiveness of the TSSP

The following list represents suggested actions identified during the review that could improve the effectiveness of TSSP operations. These actions are optional:

<table>
<thead>
<tr>
<th>A. Applicability of SHR Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create and post the “Limited Appointment versus Spherion Preliminary Study Worksheet” on the TSSP website.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>B. Central and Departmental Monitoring of TSSP</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Assign responsibility for coordinating TSSP financial and recruitment administrative processes to one person in each department/unit.</td>
</tr>
<tr>
<td>2. Create a campus TSSP Department Coordinators liaison program to support the departmental coordinators in their role.</td>
</tr>
<tr>
<td>3. Require the timely online approval of time cards by TSS.</td>
</tr>
<tr>
<td>4. Create a table with corresponding columns of problems and who to contact as a tool for temporary staffing departmental users.</td>
</tr>
<tr>
<td>5. Designate a person accountable for monitoring the TSSP webpage content.</td>
</tr>
<tr>
<td>6. Compile all information and guidance regarding the TSSP webpage into one access point.</td>
</tr>
<tr>
<td>7. Create a Human Resources section in the TSSP webpage containing a summary of mandatory control points specific to temporary staffing hiring.</td>
</tr>
<tr>
<td>8. Update the description of the Pro-card Administrator role on the TSSP website.</td>
</tr>
<tr>
<td>9. Create TSSP record retention guidelines indicating which records should be kept and acceptable means of storage (paper/electronic). Posting of these guidelines on the TSSP website.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C. Obtaining Temporary Staffing Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Require use of the SHR Critical Function Guide by Spherion and campus departments to determine specific needs for background checks.</td>
</tr>
<tr>
<td>2. Require Spherion to confirm the completion of background checks via email to the departmental distribution list.</td>
</tr>
<tr>
<td>3. Require Spherion to generate an email distribution list with names provided in the Staffing Request, and use it for all communications to departments during search and recruitment process according to agreed procedure.</td>
</tr>
<tr>
<td>4. Establish as mandatory for campus departments and Spherion the use of the online Staffing Request form to process staffing requests.</td>
</tr>
</tbody>
</table>
5. Require campus departments to include in the Staffing Request, the names of staff members with departmental hiring and funding authority.

6. Add the Purchasing Card Authorizer (PCA) to the Staffing Request form to ensure his/her inclusion in the emails distribution.

7. Change the Staffing Request background check roll down menu in order to match the SHR Critical Function Guide terminology.

8. Ensure that the campus staff roles terminology within the Spherion Staffing Request form matches the campus TSSP terminology.

<table>
<thead>
<tr>
<th>D. Temporary Staffing USBank Cardless Account</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Require the passing of quiz in the cardless account on line training to enable the establishment of an account.</td>
</tr>
<tr>
<td>2. Require the new cardless account application form to include two line items for PC and PCA confirmation of training completion.</td>
</tr>
<tr>
<td>3. Consider adding an expiration date on the cardless account.</td>
</tr>
<tr>
<td>4. Require a review of the reasonableness of the formula used by Spherion to request increase of cardless accounts dollar limit prior to approval.</td>
</tr>
<tr>
<td>5. Remove the old cardless account application form from the P&amp;BC website.</td>
</tr>
<tr>
<td>6. Revise the reconciliation procedure on the TSSP webpage to describe the reconciliation steps and review points. Remove the comment above the signature lines on the USBank statement.</td>
</tr>
</tbody>
</table>