

STATE EMPLOYEES' RETIREMENT SYSTEM OF ILLINOIS

COMPLIANCE EXAMINATION OF CENSUS DATA

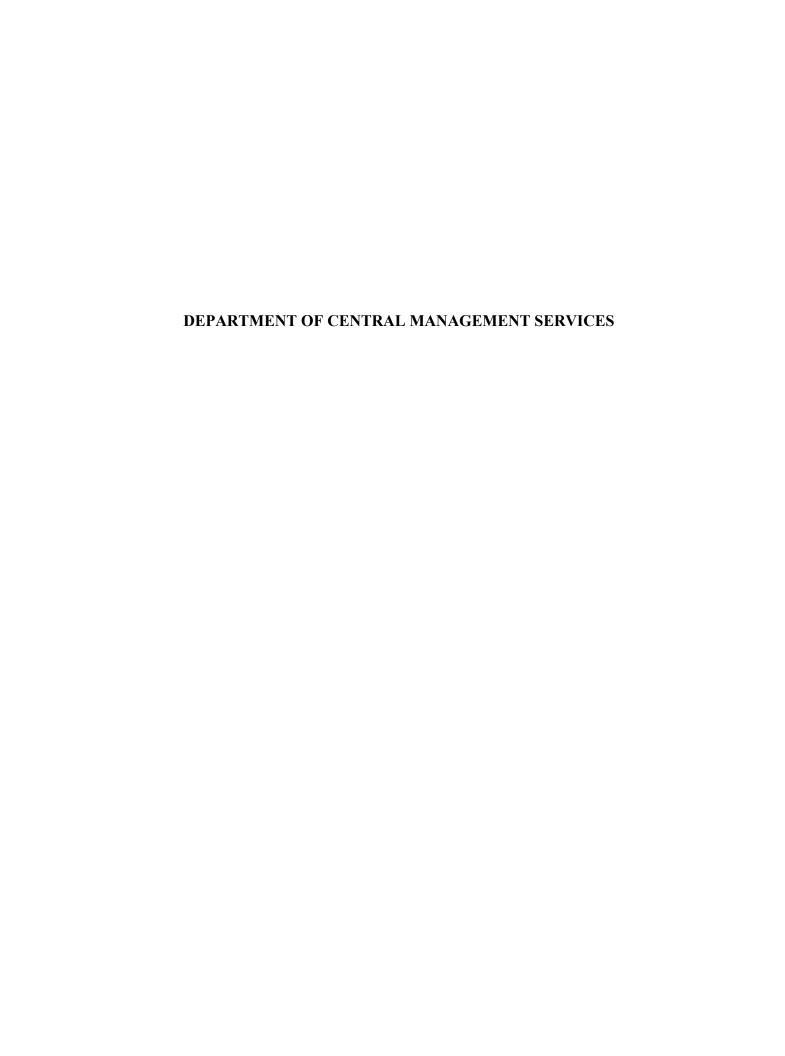


STATE EMPLOYEES' RETIREMENT SYSTEM OF ILLINOIS

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

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STATE OF ILLINOIS DEPARTMENT OF CENTRAL MANAGEMENT SERVICES PENSION SYSTEM COMPLIANCE EXAMINATION For the Year Ended June 30, 2021

AGENCY OFFICIALS

Director (Acting) (6/13/2022 - Present) Director (2/18/2020 - 6/12/2022)

Assistant Director (Acting) (9/7/2021 – Present) Assistant Director (3/28/2022 – Present)

Assistant Director (Acting) (5/1/2021 - 3/27/2022)

Assistant Director (12/4/2020 – 4/30/2021)

Assistant Director (Acting) (7/1-2020 - 12/3/2020)

Chief of Staff

Chief Administrative Officer (5/1/2021 – Present) Chief Administrative Officer (7/1/2020 – 4/30/2021)

Chief Operating Officer

Chief Fiscal Officer (1/21/2021 – Present) Chief Fiscal Officer (Acting) (7/1/2020 – 1/20/2021)

General Counsel

Chief Internal Auditor

Mr. Anthony Pascente

Ms. Janel Forde

Ms. Raven DeVaughn Mr. Mark Mahoney Mr. Mark Mahoney

Vacant

Mr. Michael Merchant

Mr. Anthony Pascente

Ms. Sarah Kerley Mr. Mark Mahoney

Ms. Aysegul Kalaycioglu

Ms. Karen Pape Ms. Karen Pape

Mr. Terrence Glavin

Mr. Jack Rakers

Agency main offices are located at:

702 Stratton Office Building 401 South Spring Street Springfield, IL 62706

MANAGEMENT ASSERTION LETTER

July 21, 2022

Sikich LLP 3201 W. White Oaks Dr., Suite 102 Springfield, IL 62704

Ladies and Gentlemen:

We are responsible for the identification of, and compliance with, all aspects of laws, rules, and regulations applicable to identifying and enrolling eligible employees of the State of Illinois, Department of Central Management Services (Department) and reporting their significant elements of census data and related employer contributions within the State Employees Retirement System (System). We are responsible for and we have established and maintained an effective system of internal controls over the specified requirements. We have performed an evaluation of the Department's compliance with the specified requirements during the applicable periods noted below. Based on this evaluation, we assert the Department has materially complied with the specified requirements listed below.

- A. All of the Department's employees required to be enrolled in the System in accordance with applicable laws, rules, and regulations were properly enrolled in the System during the census data accumulation year ended June 30, 2021.
- B. The changes in significant elements of census data for employees required to be enrolled in the System occurring during the census data accumulation year ended June 30, 2021, were completely and accurately reported by the Department to the System. The significant elements of census data of the System include each employee's:
 - social security number;
 - first and last name;
 - date of birth;
 - gender;
 - rate of pay; and,
 - retirement deduction code.
- C. The employer contributions remitted by the Department to the System during the proportionate share allocation year ended June 30, 2021, were complete, accurate, and in accordance with applicable laws, rules, and regulations.

Sincerely,

Illinois Department of Central Management Services

SIGNED ORIGINAL ON FILE

Anthony Pascente, Acting Director

SIGNED ORIGINAL ON FILE

Karen Pape, Chief Financial Officer

SIGNED ORIGINAL ON FILE

Terrence Glavin, General Counsel

STATE OF ILLINOIS DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

EXAMINATION REPORT

SUMMARY

The compliance testing of census data and employer contributions for pensions under the State Employees' Retirement System performed during this examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants; the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States; the Illinois State Auditing Act (Act); and the *Audit Guide*.

ACCOUNTANT'S REPORT

The Independent Accountant's Report on State Compliance and on Internal Control Over Compliance does not contain scope limitations or disclaimers or other significant non-standard language.

SUMMARY OF FINDINGS

	Current	Prior
Number of	<u>Report</u>	Report*
Findings	1	N/A
Repeated Findings	N/A	N/A
Prior Recommendations Implemented or Not Repeated	N/A	N/A

^{*} This is the first compliance examination over census data. Therefore, there were no prior findings.

SCHEDULE OF FINDINGS

Item No.	Page	Last/First Reported	Description	Finding Type
			Current Finding	
2021-001	9	New	Inaccurate Census Data	Significant Deficiency and Noncompliance

EXIT CONFERENCE

The Illinois Department of Central Management Services waived an exit conference in a correspondence from Amy Lange, Audit Liaison, on July 6, 2022.



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INDEPENDENT ACCOUNTANT'S REPORT ON COMPLIANCE AND ON INTERNAL CONTROL OVER COMPLIANCE

Honorable Frank J. Mautino Auditor General State of Illinois

Honorable Susana M. Mendoza Comptroller State of Illinois

Mr. Anthony Pascente Acting Director Illinois Department of Central Management Services

External Auditors
Illinois Department of Central Management Services

Board of Trustees State Employees' Retirement System of Illinois

Mr. Timothy B. Blair Executive Secretary State Employees' Retirement System of Illinois

Compliance

As limited-scope Special Assistant Auditors for the Auditor General of the State Employees' Retirement System (System), we have examined compliance by management of the State of Illinois, Department of Central Management Services (Department) with the specified requirements listed below, as more fully described in the *Audit Guide for Financial Audits and Compliance Attestation Engagements of Illinois State Agencies (Audit Guide)* as adopted by the Auditor General, during the census data accumulation year for the System ended June 30, 2021, and the proportionate share allocation year for the System ended June 30, 2021. Management of the Department is responsible for compliance with the specified requirements. Our responsibility is to express an opinion on the Department's compliance with the specified requirements based on our examination.

The specified requirements are:

- A. All of the Department's employees required to be enrolled in the System in accordance with applicable laws, rules, and regulations were properly enrolled in the System during the census data accumulation year ended June 30, 2021.
- B. The changes in significant elements of census data for employees required to be enrolled in the System occurring during the census data accumulation year ended June 30, 2021, were completely and accurately reported by the Department to the System.

The significant elements of census data of the System include each employee's:

- social security number;
- first and last name;
- date of birth;
- gender;
- rate of pay; and,
- retirement deduction code.
- C. The employer contributions remitted by the Department to the System during the proportionate share allocation year ended June 30, 2021, were complete, accurate, and in accordance with applicable laws, rules, and regulations.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the Illinois State Auditing Act (Act), and the *Audit Guide*. Those standards, the Act, and the *Audit Guide* require that we plan and perform the examination to obtain reasonable assurance about whether the Department complied with the specified requirements in all material respects. An examination involves performing procedures to obtain evidence about whether the Department complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risks of material noncompliance with the specified requirements, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the Department's compliance with the specified requirements.

In our opinion, the Department complied with the specified requirements during the census data accumulation year for the System ended June 30, 2021, and the proportionate share allocation year for the System ended June 30, 2021, in all material respects. However, the results of our procedures disclosed instances of noncompliance with the specified requirements, which are required to be reported in accordance with criteria established by the *Audit Guide* and are described in the accompanying Schedule of Findings as item 2021-001.

The Department's response to compliance finding identified in our examination is described in the accompanying Schedule of Findings. The Department's response was not subjected to the procedures applied in the examination and, accordingly, we express no opinion on the response.

The purpose of this report is solely to describe the scope of our testing and the results of that testing in accordance with the requirements of the *Audit Guide*. Accordingly, this report is not suitable for any other purpose.

Internal Control Over Compliance

Management of the Department is responsible for establishing and maintaining effective internal control over compliance with the specified requirements (internal control). In planning and performing our examination, we considered the Department's internal control to determine the examination procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the Department's compliance with the specified requirements and to test and report on the Department's internal control in accordance with the *Audit Guide*, but not for the purpose of expressing an opinion on the effectiveness of the Department's internal control. Accordingly, we do not express an opinion on the effectiveness of the Department's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with the specified requirements on a timely basis. A material weakness in internal control is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that material noncompliance with the specified requirements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify any deficiencies in internal control that we consider to be material weaknesses. However, we did identify certain deficiencies in internal control, described in the accompanying Schedule of Findings as item 2021-001 that we consider to be a significant deficiency.

The Department's response to the internal control finding identified in our examination is described in the accompanying Schedule of Findings. The Department's response was not subjected to the procedures applied in the examination and, accordingly, we express no opinion on the response.

The purpose of this report is solely to describe the scope of our testing of internal control and the results of that testing based on the requirements of the *Audit Guide*. Accordingly, this report is not suitable for any other purpose.

SIGNED ORIGINAL ON FILE

Springfield, Illinois July 21, 2022

STATE OF ILLINOIS **DEPARTMENT OF CENTRAL MANAGEMENT SERVICES**

COMPLIANCE EXAMINATION OF CENSUS DATA SCHEDULE OF FINDINGS

For the Year Ended June 30, 2021

2021-001 **FINDING** (Inaccurate Census Data)

The Department of Central Management Services (Department) did not ensure accurate census data was used in the actuarial valuations.

Census data is demographic data (date of birth, gender, years of service, etc.) of the active, inactive, or retired members of a pension or other postemployment benefit (OPEB) plan. The accumulation of inactive or retired members' census data occurs before the current accumulation period of census data used in the plan's actuarial valuations (which eventually flows into each employers financial statements), meaning the plan is solely responsible for establishing internal controls over these records and transmitting this data to the plan's actuary. In contrast, responsibility for active members' census data during the current accumulation period is split among the plan and each member's current employer(s). Initially, employers must accurately transmit census data elements of their employees to the plan. Then, the plan must record and retain these records for active employees and then transmit this census data to the plan's actuary.

We noted the Department's employees are members of both the State Employees' Retirement System of Illinois (SERS) for their pensions and the State Employees Group Insurance Program sponsored by the Department for their OPEB. In addition, we noted these plans have characteristics of different types of pension and OPEB plans, including single employer plans and cost-sharing multiple-employer plans.

During backwards testing, we noted one of 40 (3%) employee had a retirement code that differed between Department and SERS records, which resulted in inaccurate data being used in the pension and OPEB actuarial valuations. The independent actuary used for the pension and OPEB plans deemed the error immaterial to the valuations.

The State Records Act (5 ILCS 160/8) requires the Department make and preserve records containing adequate and proper documentation of its essential transactions to protect the legal and financial rights of the State and of persons directly affected by the Department's activities.

Further, the Fiscal Control and Internal Auditing Act (30 ILCS 10/3001) requires the Department establish and maintain a system, or systems, of internal fiscal and administrative control to provide assurance funds applicable to operations are properly recorded and accounted for to permit the preparation of reliable financial and statistical reports.

Department officials indicated these exceptions were due to oversight.

STATE OF ILLINOIS

DEPARTMENT OF CENTRAL MANAGEMENT SERVICES

COMPLIANCE EXAMINATION OF CENSUS DATA SCHEDULE OF FINDINGS

For the Year Ended June 30, 2021

2021-001 **FINDING** (Inaccurate Census Data) (Continued)

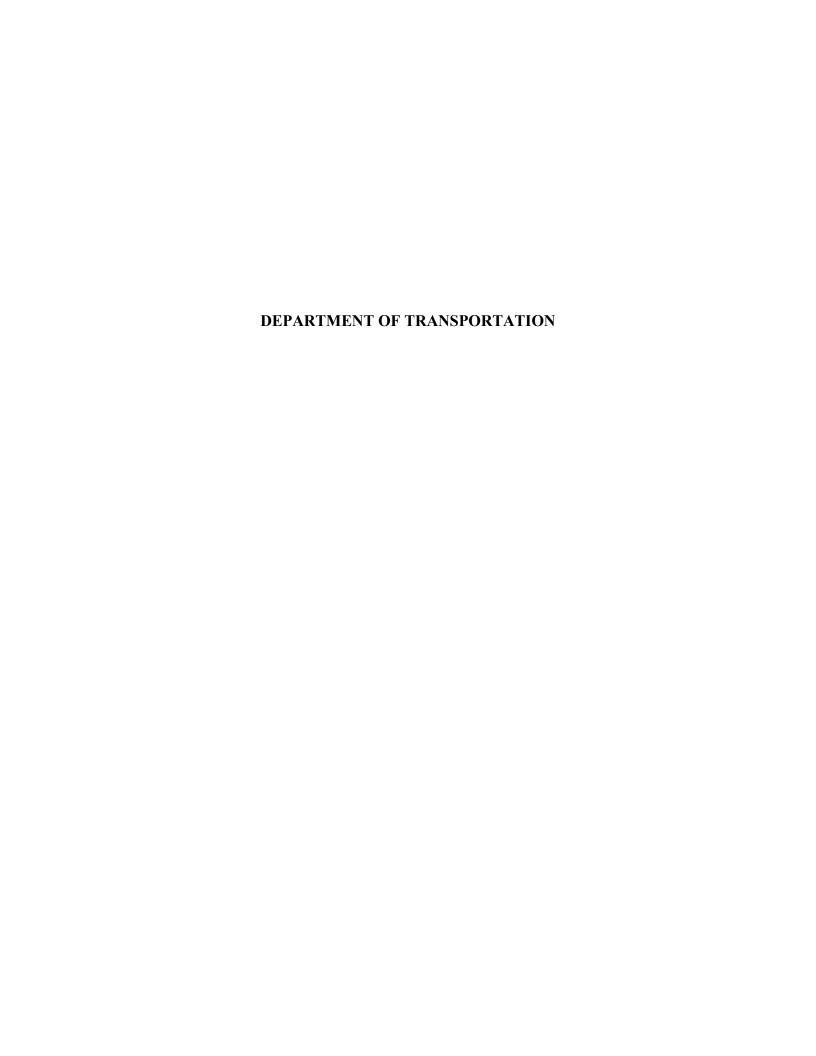
Failure to ensure census data reported to SERS was complete and accurate may result in a material misstatement of the Department's financial statements and reduced the overall accuracy of SERS-related pension liabilities, deferred inflows and outflows of resources, and expense recorded by the State and its agencies.

RECOMMENDATION

We recommend the Department implement controls to ensure accurate data is used in the actuarial valuation. If differences are noted between the Department's data and SERS these differences should be communicated timely to ensure the actuarial valuations are using accurate data.

DEPARTMENT RESPONSE

The Bureau of Personnel (BoP) has completed the initial reconciliation of census data. BoP has contacted SERS in preparation for the annual reconciliation for current year 2022. BoP anticipates having the annual reconciliation completed on-time in accordance with the statute.



ILLINOIS DEPARTMENT OF TRANSPORTATION

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

DEPARTMENT OFFICIALS

Secretary (06/01/21 - Present) Mr. Omer Osman Secretary (Acting) (07/01/20 - 05/31/21) Mr. Omer Osman

Assistant Secretary Vacant

Chief of Staff Ms. Georgina (Syas) White

Deputy Chief of Staff (05/16/22 – Present) Vacant

Deputy Chief of Staff (07/01/20 - 05/15/22) Ms. Becky Locker

Chief Operating Officer (04/23/22 – Present) Vacant

Chief Operating Officer (07/01/20 - 04/22/22) Ms. Sheleda Doss

Chief Fiscal Officer (04/01/22 – Present)

Chief Fiscal Officer (Acting) (07/01/20 – 03/31/22)

Ms. Vickie Wilson

Ms. Joanne Woodworth

Director, Office of Communications Mr. Guy Tridgell

Director, Office of Legislative Affairs (01/01/22 – Present) Mr. Matthew McAnarney Director, Office of Legislative Affairs (Acting) Mr. Matthew McAnarney

(12/01/21 - 12/31/21)

Director, Office of Legislative Affairs (07/01/20 – 11/30/21) Ms. Nicola Cortez-Hun

Director, Office of Finance and Administration Ms. Vicki Wilson

(02/16/22 - Present)

Director, Office of Finance and Administration Vacant

(07/01/20 - 02/15/22)

Deputy Director, Office of Finance and Administration Mr. Matt Magalis

Director, Office of Business and Workforce Diversity Mr. Jonathan McGee

(05/02/22 - Present)

Director, Office of Business and Workforce Diversity Vacant

(01/01/22 - 05/01/22)

Director, Office of Business and Workforce Diversity

Ms. Pamela Simon

(07/01/20 - 12/31/21)

Director/Chief Legal Counsel, Office of Chief Ms. Yangsu Kim

Counsel (06/01/2021 – Present)

Director/Chief Legal Counsel, Office of Chief Ms. Margaret VanDijk

Counsel (Acting) (05/01/21 - 05/31/21)

Director/Chief Legal Counsel, Office of Chief Mr. Phil Kaufmann

Counsel (07/01/20 - 04/30/21)

ILLINOIS DEPARTMENT OF TRANSPORTATION

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

Director/Chief Internal Auditor, Office of Internal Audit Mr. Stephen Kirk Deputy Secretary of Communications and Legislative Ms. Becky Locker Affairs formally Deputy Secretary of Program Development and External Affairs (05/15/22 – Present) Deputy Secretary of Communications and Legislative Vacant Affairs formally Deputy Secretary of Program Development and External Affairs (01/01/22 - 05/15/22)Deputy Secretary of Communications and Legislative Mr. Douglas House Affairs formally Deputy Secretary of Program Development and External Affairs (07/01/20 – 04/22/22) Deputy Secretary of Administration, Diversity and Legal Ms. Margaret vanDijk Affairs (03/16/21 - Present)Deputy Secretary of Administration, Diversity and Legal Vacant Affairs (07/01/20 - 03/15/21)Deputy Secretary of Project Implementation Vacant Director, Office of Planning and Programming Ms. Holly (Ostdick) Bieneman (09/16/20 - Present)Director, Office of Planning and Programming Vacant (07/01/20 - 09/15/20)Deputy Director, Office of Planning and Programming Ms. Elizabeth Irvin (07/01/22 - Present)Deputy Director, Office of Planning and Programming Vacant (07/01/20 - 06/30/22)Director, Office of Highways Project Implementation Mr. Stephen Travia (07/01/21 - Present)Director, Office of Highways Project Implementation Vacant (07/01/20 - 06/30/21)Deputy Director, Office of Highways Project Mr. Justan Mann Implementation (11/16/21 - Present) Deputy Director, Office of Highways Project Vacant Implementation (07/01/20 - 11/15/21)Director, Office of Intermodal Project Implementation Mr. Jason Osborn (01/18/22 - Present)Director, Office of Intermodal Project Implementation Mr. Matt Magalis (Acting) (07/01/20 - 01/17/22)Deputy Director, Rail, Office of Intermodal Project Mr. John Oimoen

Implementation

ILLINOIS DEPARTMENT OF TRANSPORTATION

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

Deputy Director, Transit, Office of Intermodal Project Implementation (06/01/21 – Present)

Ms. Ashounta Reese

Deputy Director, Transit, Office of Intermodal Project Implementation (Acting) (07/01/20 – 05/31/21)

Mr. John Oimoen

Deputy Director, Aeronautics, Office of Intermodal Project Implementation

Mr. Clayton Stambaugh

The Department's primary administrative offices are located at:

2300 S. Dirksen Parkway Springfield, IL 62764

69 W. Washington Street Chicago, IL 60602

MANAGEMENT ASSERTION LETTER

July 21, 2022

Sikich LLP 3201 W. White Oaks Dr., Suite 102 Springfield, IL 62704

Ladies and Gentlemen:

We are responsible for the identification of, and compliance with, all aspects of laws, rules, and regulations applicable to identifying and enrolling eligible employees of the State of Illinois, Department of Transportation (Department) and reporting their significant elements of census data and related employer contributions within the State Employees Retirement System (System). We are responsible for and we have established and maintained an effective system of internal controls over the specified requirements. We have performed an evaluation of the Department's compliance with the specified requirements during the applicable periods noted below. Based on this evaluation, we assert the Department has materially complied with the specified requirements listed below.

- A. All of the Department's employees required to be enrolled in the System in accordance with applicable laws, rules, and regulations were properly enrolled in the System during the census data accumulation year ended June 30, 2021.
- B. The changes in significant elements of census data for employees required to be enrolled in the System occurring during the census data accumulation year ended June 30, 2021, were completely and accurately reported by the Department to the System. The significant elements of census data of the System include each employee's:
 - a. social security number;
 - b. first and last name:
 - c. date of birth;
 - d. gender;
 - e. rate of pay; and,
 - f. retirement deduction code.
- C. The employer contributions remitted by the Department to the System during the proportionate share allocation year ended June 30, 2021, were complete, accurate, and in accordance with applicable laws, rules, and regulations.

Yours truly,

Illinois Department of Transportation

SIGNED ORIGINAL ON FILE

Omer Osman, Secretary

SIGNED ORIGINAL ON FILE

Vicki Wilson, Chief Fiscal Officer

SIGNED ORIGINAL ON FILE

Yangsu Kim, Chief Legal Counsel

STATE OF ILLINOIS ILLINOIS DEPARTMENT OF TRANSPORTATION

COMPLIANCE EXAMINATION OF CENSUS DATA For the Year Ended June 30, 2021

EXAMINATION REPORT

SUMMARY

The compliance testing of census data and employer contributions for pensions under the State Employees' Retirement System performed during this examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants; the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States; the Illinois State Auditing Act (Act); and the *Audit Guide*.

ACCOUNTANT'S REPORT

The Independent Accountant's Report on State Compliance and on Internal Control Over Compliance does not contain scope limitations or disclaimers or other significant non-standard language.

SUMMARY OF FINDINGS

	Current	Prior
Number of	Report	Reports*
Findings	0	N/A
Repeated Findings	N/A	N/A
Prior Recommendations Implemented or Not Repeated	N/A	N/A

^{*} This is the first compliance examination over census data. Therefore, there were no prior findings.

EXIT CONFERENCE

The Department waived an exit conference in a correspondence from Jerry Nimmons, Internal Auditor, on July 28, 2022.



3201 W. White Oaks Dr., Suite 102 Springfield, IL 62704 217.793.3363

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INDEPENDENT ACCOUNTANT'S REPORT ON COMPLIANCE AND ON INTERNAL CONTROL OVER COMPLIANCE

Honorable Frank J. Mautino Auditor General State of Illinois

Honorable Susana M. Mendoza Comptroller State of Illinois

Mr. Omer Osman Secretary Illinois Department of Transportation

External Auditors
Illinois Department of Transportation

Board of Trustees State Employees' Retirement System of Illinois

Mr. Timothy B. Blair Executive Secretary State Employees' Retirement System of Illinois

Compliance

As limited-scope Special Assistant Auditors for the Auditor General of the State Employees' Retirement System (System), we have examined compliance by management of the State of Illinois, Department of Transportation (Department) with the specified requirements listed below, as more fully described in the *Audit Guide for Financial Audits and Compliance Attestation Engagements of Illinois State Agencies (Audit Guide)* as adopted by the Auditor General, during the census data accumulation year for the System ended June 30, 2021, and the proportionate share allocation year for the System ended June 30, 2021. Management of the Department is responsible for compliance with the specified requirements. Our responsibility is to express an opinion on the Department's compliance with the specified requirements based on our examination.

The specified requirements are:

- A. All of the Department's employees required to be enrolled in the System in accordance with applicable laws, rules, and regulations were properly enrolled in the System during the census data accumulation year ended June 30, 2021.
- B. The changes in significant elements of census data for employees required to be enrolled in the System occurring during the census data accumulation year ended June 30, 2021, were completely and accurately reported by the Department to the System.

The significant elements of census data of the System include each employee's:

- social security number;
- first and last name;
- date of birth:
- gender;
- rate of pay; and,
- retirement deduction code.
- C. The employer contributions remitted by the Department to the System during the proportionate share allocation year ended June 30, 2021, were complete, accurate, and in accordance with applicable laws, rules, and regulations.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, the standards applicable to attestation engagements contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the Illinois State Auditing Act (Act), and the *Audit Guide*. Those standards, the Act, and the *Audit Guide* require that we plan and perform the examination to obtain reasonable assurance about whether the Department complied with the specified requirements in all material respects. An examination involves performing procedures to obtain evidence about whether the Department complied with the specified requirements. The nature, timing, and extent of the procedures selected depend on our judgement, including an assessment of the risks of material noncompliance with the specified requirements, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

Our examination does not provide a legal determination on the Department's compliance with the specified requirements.

In our opinion, the Department complied with the specified requirements during the census data accumulation year for the System ended June 30, 2021, and the proportionate share allocation year for the System ended June 30, 2021, in all material respects.

The purpose of this report is solely to describe the scope of our testing and the results of that testing in accordance with the requirements of the *Audit Guide*. Accordingly, this report is not suitable for any other purpose.

Internal Control Over Compliance

Management of the Department is responsible for establishing and maintaining effective internal control over compliance with the specified requirements (internal control). In planning and performing our examination, we considered the Department's internal control to determine the examination procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the Department's compliance with the specified requirements and to test and report on the Department's internal control in accordance with the *Audit Guide*, but not for the purpose of expressing an opinion on the effectiveness of the Department's internal control. Accordingly, we do not express an opinion on the effectiveness of the Department's internal control.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with the specified requirements on a timely basis. A material weakness in internal control is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that material noncompliance with the specified requirements will not be prevented, or detected and corrected, on a timely basis. A significant deficiency in internal control is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that have not been identified. We did not identify any deficiencies in internal control that we consider to be material weaknesses.

The purpose of this report is solely to describe the scope of our testing of internal control and the results of that testing based on the requirements of the *Audit Guide*. Accordingly, this report is not suitable for any other purpose.

SIGNED ORIGINAL ON FILE

Springfield, Illinois July 21, 2022