# State of Illinois
# Illinois Independent Tax Tribunal

## COMPLIANCE EXAMINATION

**FOR THE TWO YEARS ENDED**
**JUNE 30, 2025**

**PERFORMED AS SPECIAL**
**ASSISTANT AUDITORS FOR THE**
**AUDITOR GENERAL,**
**STATE OF ILLINOIS**

Roth&Co

**STATE OF ILLINOIS**
**ILLINOIS INDEPENDENT TAX TRIBUNAL**
**STATE COMPLIANCE EXAMINATION**
**For the Two Years Ended June 30, 2025**

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**STATE OF ILLINOIS**
**ILLINOIS INDEPENDENT TAX TRIBUNAL**
**STATE COMPLIANCE EXAMINATION**
**For the Two Years Ended June 30, 2025**

## TRIBUNAL OFFICIALS

***Judges***

| | |
|---|---|
| Chief Administrative Law Judge | Mr. James Conway |
| Administrative Law Judge (1) | Mr. Brian Barov |
| Administrative Law Judge (2) | Vacant |
| Administrative Law Judge (3) | Vacant |

***Administrative Services***

| | |
|---|---|
| Chief Administrative Officer | Ms. Kristene Callanta |
| Clerk | Vacant* |
| Reporter | Vacant* |

*The Tribunal is statutorily required to appoint a clerk and reporter pursuant to the Illinois Independent Tax Tribunal Act (35 ILCS 1010/1-40). The vacancies above are considered noncompliance and are reported as part of Finding 2025-002 on pages 11-13 of this report.

## TRIBUNAL OFFICE

The Tribunal's office is located at:

Michael A. Bilandic Building
160 North LaSalle Street, Room N-506
Chicago, Illinois 60601

**Illinois Independent**

**Tax Tribunal**

*160 N. La Salle Street Room N506*
*Chicago, Illinois 60601*

*Phone: (312) 814-4285*
*Fax: (312) 814-4768*
*Email: ITT.TaxTribunal@illinois.gov*

MANAGEMENT ASSERTION LETTER

January 20, 2026

Roth & Company, LLP

540 West Madison Street, Suite 2450

Chicago, Illinois 60661

Roth & Company, LLP:

We are responsible for the identification of, and compliance with, all aspects of laws, regulations, contracts, or grant agreements that could have a material effect on the operations of the State of Illinois, Independent Tax Tribunal (Tribunal). We are responsible for and we have established and maintained an effective system of internal controls over compliance requirements. We have performed an evaluation of the Tribunal's compliance with the following specified requirements during the two-year period ended June 30, 2025. Based on this evaluation, we assert that during the years ended June 30, 2024, and June 30, 2025, the Tribunal has materially complied with the specified requirements listed below.

A. The Tribunal has obligated, expended, received, and used public funds of the State in accordance with the purpose for which such funds have been appropriated or otherwise authorized by law.

B. The Tribunal has obligated, expended, received, and used public funds of the State in accordance with any limitations, restrictions, conditions, or mandatory directions imposed by law upon such obligation, expenditure, receipt, or use.

C. The Tribunal has complied, in all material respects, with applicable laws and regulations, including the State uniform accounting system, in its financial and fiscal operations.

D. Other than what has been previously disclosed and reported in the Schedule of Findings, State revenues and receipts collected by the Tribunal are in accordance with applicable laws and regulations and the accounting and recordkeeping of such revenues and receipts is fair, accurate, and in accordance with law.

Yours truly,

State of Illinois, Independent Tax Tribunal

SIGNED ORIGINAL ON FILE

James Conway

Director/Chief Administrative Law Judge

SIGNED ORIGINAL ON FILE

Kristene Callanta

Chief Administrative Officer

**STATE OF ILLINOIS**
**ILLINOIS INDEPENDENT TAX TRIBUNAL**
**STATE COMPLIANCE EXAMINATION**
**For the Two Years Ended June 30, 2025**

## STATE COMPLIANCE REPORT

## SUMMARY

The State compliance testing 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.*

## ACCOUNTANTS' REPORT

The Independent Accountants' Report on State Compliance and on Internal Control Over Compliance does not contain scope limitations or disclaimers, but does contain a modified opinion on compliance and identifies a material weakness over internal control over compliance.

## SUMMARY OF FINDINGS

| **Number of** | **Current Report** | **Prior Report** |
|---|---|---|
| Findings | 4 | 8 |
| Repeated Findings | 4 | 5 |
| Prior Recommendations Implemented or Not Repeated | 4 | 1 |

## SCHEDULE OF FINDINGS

| Item No. | Page | Last/First Reported | Description | Finding Type |
|---|---|---|---|---|
| | | | **Current Findings** | |
| 2025-001 | 9 | 2023/2015 | Inadequate Control over Filing Fees | Significant Deficiency and Noncompliance |
| 2025-002 | 11 | 2023/2015 | Failure to Fully Implement the Illinois Independent Tax Tribunal Act of 2012 | Significant Deficiency and Noncompliance |
| 2025-003 | 14 | 2023/2023 | Voucher Processing Weakness | Significant Deficiency and Noncompliance |
| 2025-004 | 16 | 2023/2023 | Receipt Processing Internal Controls Not Operating Effectively | Material Weakness and Material Noncompliance |

## SCHEDULE OF FINDINGS (Continued)

| Item No. | Page | Last/First Reported | Description |
|---|---|---|---|
| | | | **Prior Findings Not Repeated** |
| A | 18 | 2023/2023 | Inadequate Controls over Census Data |
| B | 18 | 2023/2021 | Lack of Adequate Controls over the Review of Internal Controls for Service Provider |
| C | 18 | 2023/2019 | Weaknesses in Cybersecurity Programs and Practices |
| D | 18 | 2023/2021 | Disaster Recovery Planning Weaknesses |

## EXIT CONFERENCE

The Illinois Independent Tax Tribunal waived an exit conference in a correspondence from James Conway, Director/Chief Administrative Law Judge, on January 15, 2026. The responses to the recommendations were provided by James Conway, Director/Chief Administrative Law Judge, in a correspondence dated January 15, 2026.

Roth&Co

**INDEPENDENT ACCOUNTANTS' REPORT**
**ON STATE COMPLIANCE AND ON INTERNAL CONTROL OVER COMPLIANCE**

Honorable Frank J. Mautino
Auditor General
State of Illinois

and

Governing Board
State of Illinois, Independent Tax Tribunal

**Report on State Compliance**

As Special Assistant Auditors for the Auditor General, we have examined compliance by the State of Illinois, Independent Tax Tribunal (Tribunal) 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 two years ended June 30, 2025. Management of the Tribunal is responsible for compliance with the specified requirements. Our responsibility is to express an opinion on the Tribunal's compliance with the specified requirements based on our examination.

The specified requirements are:

A. The Tribunal has obligated, expended, received, and used public funds of the State in accordance with the purpose for which such funds have been appropriated or otherwise authorized by law.

B. The Tribunal has obligated, expended, received, and used public funds of the State in accordance with any limitations, restrictions, conditions, or mandatory directions imposed by law upon such obligation, expenditure, receipt, or use.

C. The Tribunal has complied, in all material respects, with applicable laws and regulations, including the State uniform accounting system, in its financial and fiscal operations.

D. State revenues and receipts collected by the Tribunal are in accordance with applicable laws and regulations and the accounting and recordkeeping of such revenues and receipts is fair, accurate, and in accordance with law.

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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 Tribunal complied with the specified requirements in all material respects. An examination involves performing procedures to obtain evidence about whether the Tribunal 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 modified 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 Tribunal's compliance with the specified requirements.

Our examination disclosed material noncompliance with the following specified requirement applicable to the Tribunal during the two years ended June 30, 2025. As described in the accompanying Schedule of Findings as item 2025-004, the Tribunal had not ensured the State revenues and receipts collected by the Tribunal were in accordance with applicable laws and regulations and the accounting and recordkeeping of such revenues and receipts was fair, accurate, and in accordance with law.

In our opinion, except for the material noncompliance with the specified requirement described in the preceding paragraph, the Tribunal complied with the specified requirements during the two years ended June 30, 2025, 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 items 2025-001 through 2025-003.

The Tribunal's responses to the compliance findings identified in our examination are described in the accompanying Schedule of Findings. The Tribunal's responses were not subjected to the procedures applied in the examination and, accordingly, we express no opinion on the responses.

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.

**Report on Internal Control Over Compliance**

Management of the Tribunal 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 Tribunal's internal control to determine the examination procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the Tribunal's compliance with the specified requirements and to test and report on the Tribunal's internal control in accordance with the *Audit Guide*, but not for the purpose of expressing an opinion on the effectiveness of the Tribunal's internal control. Accordingly, we do not express an opinion on the effectiveness of the Tribunal's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph 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. However, as described in the accompanying Schedule of Findings, we did identify certain deficiencies in internal control that we consider to be material weaknesses and significant deficiencies.

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 a material noncompliance with the specified requirements will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies described in the accompanying Schedule of Findings as item 2025-004 to be a material weakness.

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. We consider the deficiencies described in the accompanying Schedule of Findings as items 2025-001 through 2025-003 to be significant deficiencies.

As required by the *Audit Guide*, immaterial findings excluded from this report have been reported in a separate letter.

The Tribunal's responses to the internal control findings identified in our examination are described in the accompanying Schedule of Findings. The Tribunal's responses were not subjected to the procedures applied in the examination and, accordingly, we express no opinion on the responses.

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**

Chicago, Illinois
January 20, 2026

**STATE OF ILLINOIS**
**ILLINOIS INDEPENDENT TAX TRIBUNAL**
**SCHEDULE OF FINDINGS – CURRENT FINDINGS**
**For the Two Years Ended June 30, 2025**

2025-001. **FINDING** (Inadequate Control over Filing Fees)

The Illinois Independent Tax Tribunal (Tribunal) did not handle filing fees received with incorrectly filed petitions in accordance with State laws and regulations.

During testing, we noted the Tribunal occasionally receives petitions that are incorrectly filed. The incorrectly filed petitions are either immediately dismissed or dismissed with the ability to amend and refile. In either scenario, the Tribunal returns the petitioner's original $500 check or money order to the taxpayer through the mail or securely disposes of the checks. The Tribunal's records indicated this occurred five times, totaling $2,500 during Fiscal Year 2024 and once, totaling $500 during Fiscal Year 2025.

The State Officers and Employees Money Disposition Act (Act) (30 ILCS 230/2) requires the Tribunal to deposit the entire remittance into the State Treasury.

In addition, we noted the following related to this process:

- For the petitions noted above, the Tribunal did not process refunds, defined as repayments of fees paid in excess or in error to the State, through the standard voucher-warrant process as defined within the Statewide Accounting Management System (SAMS) manual.

  SAMS (Procedure 11.10.40) requires the Tribunal to process refunds, defined as repayments of fees paid in excess or in error to the State, through the standard voucher-warrant process.

- The Tribunal did not have adequate appropriation authority to issue refunds for the petitions which were denied or considered inadequate. The Tribunal's appropriation authority within the Illinois Independent Tax Tribunal Fund, Fund 0169, is as follows: Public Act 103-0006 appropriated $68,000 in Fiscal Year 2024 and Public Act 103-0589 appropriated $76,700 in Fiscal Year 2025 for operational expenditures, but neither Public Act includes an appropriation to the Tribunal for paying refunds.

Tribunal management believes that fees associated with filings that are rejected in the first instance are legally not accepted and do not need to be taken and deposited. Tribunal management also indicated, as it did during the prior examination, it does not issue refunds as it believes the process it has in place of returning the original checks to the petitioners is adequate and efficient.

2025-001. **FINDING** (Inadequate Control over Filing Fees) - Continued

Failure to deposit and process refunds of filing fees through the standard voucher-warrant process represents noncompliance with State laws, rules, and regulations. Further, failure to have appropriation authority to issue refunds limits the Tribunal's ability to comply with State laws, rules, and regulations. (Finding Code No. 2025-001, 2023-001, 2021-001, 2019-001, 2017-004, 2015-004)

**RECOMMENDATION**

We recommend the Tribunal deposit payments received as required by the Act and process the necessary refunds through the State's voucher-warrant process as required by SAMS. We also recommend the Tribunal request an appropriation to pay refunds due. Finally, we recommend the Tribunal should seek a formal written opinion from the Office of the Attorney General, if the Tribunal disagrees with this position, or to seek a legislative remedy.

**TRIBUNAL RESPONSE**

We do not agree with this finding. The Tax Tribunal cannot deposit filing fee checks for petition filings that are legally deficient, or for filings completely misdirected to the Tax Tribunal, as those filings cannot legally be accepted under the Tax Tribunal statute. The Tax Tribunal has a written policy for when a filing is initially and immediately rejected for being deficient and not acceptable. Most deficient filings are not accompanied with a filing fee. If a filing cannot be accepted, any accompanying check, if any, is naturally not accepted as well and is immediately returned to the filer or destroyed with the filer's permission. Any petition filing fee check not accepted is noted in the publicly available case order dismissing the case as well as in our internal docket system and our internal monthly fee/deposits reconciliation spreadsheet.

**ACCOUNTANTS' COMMENT**

The issue within the finding is when a receipt is considered received under the State Officers and Employees Money Disposition Act as opposed to when the Tribunal can accept a petition given its limited jurisdiction under the Illinois Independent Tax Tribunal Act of 2012. Currently, the State Officers and Employees Money Disposition Act requires the Tribunal to deposit the entire remittance into the State Treasury.

If the Tribunal continues to disagree with our position, the Tribunal should seek a formal written opinion from the Office of the Attorney General or a legislative remedy as noted options in our recommendation.

2025-002. **FINDING** (Failure to Fully Implement the Illinois Independent Tax Tribunal Act of 2012)

The Illinois Independent Tax Tribunal (Tribunal) did not comply with certain statutory requirements established within the Illinois Independent Tax Tribunal Act of 2012 (Act).

During testing, we noted the following:

- The Tribunal did not maintain a principal office located within Sangamon County.

  The Act (35 ILCS 1010/1-35(a)) requires the Tribunal to maintain its principal offices in both Cook County and Sangamon County.

- The Tribunal did not appoint a clerk or a reporter.

  The Act (35 ILCS 1010/1-40(a)) requires the Tribunal to appoint a clerk and reporter. Additionally, the Act (35 ILCS 1010/1-15(b)) grants the Tribunal all of the powers necessary or convenient to carry out the purposes and provisions of this Act, including, without limitation, (1) to obtain and employ personnel as required in the Act, including any additional personnel necessary to fulfill the Tribunal's purposes and (2) to maintain offices at such places as required under this Act, and elsewhere as the Tribunal may determine.

- The Tribunal has not established requirements for the authentication of electronic submissions or legal signatures.

  The Act (35 ILCS 1010/1-85(d)) requires the Tribunal to establish, by rule, reasonable requirements for the electronic submission of documents and records and the method and type of symbol or security procedure it will accept to authenticate electronic submissions or as a legal signature.

During the previous examination as well as the current examination, the Tribunal disagreed with the requirements of the Act. More specifically, the Tribunal does not believe their caseload warrants the cost of an additional office or additional employees. Further, the Tribunal indicated they do not allow, require, or need a policy for electronic signatures due to electronic signatures are not necessary to authenticate electronic submissions.

Failure to maintain a principal office in Sangamon County, appoint a clerk and a reporter, and establish rules for the electronic submission of documents represents noncompliance with the Act. (Finding Code No. 2025-002, 2023-004, 2021-004, 2019-002, 2017-005, 2015-008)

2025-002. **FINDING** (Failure to Fully Implement the Illinois Independent Tax Tribunal Act of 2012) - Continued

**RECOMMENDATION**

We recommend the Tribunal maintain an office in Sangamon County, appoint a clerk and a reporter, and establish rules for the electronic submission of documents as required by the Act or to seek a legislative remedy.

**TRIBUNAL RESPONSE**

We do not agree with this finding. The Tax Tribunal will not hire additional employees, request that additional judges be appointed, or secure additional permanent office space in Springfield until the need arises and the related costs can be justified. The Tax Tribunal has been open for almost twelve years and the statutorily mandated size of the office was a projection done prior to its operations commencing. The General Assembly has been advised through the Tax Tribunal's yearly budget submissions and in budget hearings as to the Tribunal's current and potential future staffing and facility needs. Moreover, our budget appropriations have been reduced to allow for a minimal budget to operate just our one office and with no new additional hires. A legislative remedy to change the language of the statute should not be done at this time as being unduly burdensome and unnecessary as a stand-alone piece of legislation, but a legislative remedy, if necessary, will be sought when other legislative remedies or legislative enactments are being sought by the Tax Tribunal in the future. The current Tax Tribunal also allows for the flexibility to increase staff and facility needs should the need arise.

Electronic signatures are not necessary to authenticate electronic submissions. Filings are typically submitted by the parties by email with return email addresses, reducing the need for further verification. No one is allowed to post any court submission directly to the Tax Tribunal's docket system as only the judges, after reviewing a proposed filing, post the proposed filing to the docket. All parties public court filings and the Tax Tribunal's orders/decisions are posted on the Tax Tribunal's website so any false filing would be immediately noticeable to the parties and the court. As with the other sections of the Tax Tribunal statute listed in this finding that were enacted prior to the Tax Tribunal conducting operations, we will seek to delete this irrelevant statutory requirement through a legislative remedy when it is necessary to seek a legislative remedy to address a relevant component of the Tax Tribunal's operations.

2025-002. **FINDING** (Failure to Fully Implement the Illinois Independent Tax Tribunal Act of 2012) - Continued

**ACCOUNTANTS' COMMENT**

If the Tribunal believes compliance with the Act would result in an imprudent use of State resources and electronic signatures are not necessary and irrelevant to its operations, the Tribunal should seek a legislative remedy as a noted option in our recommendation.

2025-003. **FINDING** (Voucher Processing Weakness)

The Illinois Independent Tax Tribunal (Tribunal) had weaknesses over its voucher processing function during the examination period.

Due to our ability to rely upon the processing integrity of the Enterprise Resource Planning System (ERP) operated by the Department of Innovation and Technology (DoIT), we were able to limit our voucher testing at the Tribunal to determine whether certain key attributes were properly entered by the Tribunal's staff into ERP. In order to determine the operating effectiveness of the Tribunal's internal controls related to voucher processing and subsequent payment of interest, we selected a sample of key attributes (attributes) to determine if the attributes were properly entered into the State's Enterprise Resource Planning (ERP) System based on supporting documentation. The attributes tested were 1) vendor information, 2) expenditure amount, 3) object(s) of expenditure, and 4) the later of the receipt date of the proper bill or the receipt date of the goods and/or services.

We then conducted an analysis of the Department's expenditures data for Fiscal Years 2024 and 2025 and noted the Tribunal did not timely approve 30 of 131 (23%) vouchers processed during the examination period, totaling $14,651. We noted these vouchers were approved between 31 and 109 days after receipt of a proper bill or obligating document.

The Illinois Administrative Code (Code) (74 Ill. Admin. Code 900.70) requires the Tribunal to timely review each vendor's invoice and approve proper bills within 30 days after receipt. The Code (74 Ill. Admin. Code 1000.50) also requires the Tribunal to process payments within 30 days after physical receipt of Internal Service Fund bills. Finally, the Fiscal Control and Internal Auditing Act (FCIAA) (30 ILCS 10/3001) requires all State agencies to establish and maintain a system, or systems, of internal fiscal and administrative controls, which shall provide assurance that revenues, expenditures, and transfers of assets, resources, or funds applicable to operations are properly recorded and accounted for to permit the preparation of accounts and reliable financial and statistical reports and to maintain accountability over the State's resources.

Tribunal officials stated the issue was due to employee errors.

Failure to timely process proper bills and obligations due may result in noncompliance, unnecessary interest charges, and cash flow challenges for payees. (Finding Code No. 2025-003, 2023-007)

**RECOMMENDATION**

We recommend the Tribunal timely approve proper bills and obligations due.

2025-003. **FINDING** (Voucher Processing Weakness) - Continued

**TRIBUNAL RESPONSE**

We agree with this finding. During the last audit cycle, we were advised by the auditors of certain categories/key attributes in the ERP system that were being used by the auditors for the first time to test vouchers. We started to utilize those categories going forward, but because the last audit cycle was during this audit cycle, this issue remained until we were notified, and then additional attributes were begun to be populated. This issue should not be an issue during the next audit.

2025-004. **FINDING** (Receipt Processing Internal Controls Not Operating Effectively)

The Illinois Independent Tax Tribunal's (Tribunal) internal controls over its receipt processing function were not operating effectively during the examination period.

Due to our ability to rely upon the processing integrity of the Enterprise Resource Planning System (ERP) operated by the Department of Innovation and Technology (DoIT), we were able to limit our receipt testing at the Tribunal to determine whether certain key attributes were properly entered by the Tribunal's staff into the ERP. In order to determine the operating effectiveness of the Tribunal's internal controls related to receipt processing, we selected a sample of key attributes (attributes) to determine if the attributes were properly entered into the ERP System based on supporting documentation. The attributes tested were (1) amount, (2) fund being deposited into, (3) date of receipt, (4) date deposited, and (5) SAMS Source Code.

Our testing noted 13 of 140 (9%) attributes were not properly entered into the ERP System. Therefore, the Tribunal's internal controls over receipt processing **were not operating effectively.**

The State Officers and Employees Money Disposition Act (Act) (30 ILCS 230/2(a)) requires the Tribunal to maintain a detailed record of all moneys received, which is to include date of receipt, the payor, purpose and amount, and the date and manner of disbursement. Additionally, Statewide Accounting Management System (Manual) (Procedure 25.10.10) requires the Tribunal to segregate the money into funds and document the source of the moneys. Further, the Fiscal Control and Internal Auditing Act (30 ILCS 10/3001) requires the Tribunal to establish and maintain a system, or systems, of internal fiscal and administrative controls to provide assurance revenues, expenditures, and transfers of assets, resources, or funds applicable to the operations are properly recorded and accounted for to permit the preparation of accounts and reliable financial and statistical reports and to maintain accountability over the State's resources.

Due to this condition, we qualified our opinion because we determined the Tribunal had not complied, in all material respects, with applicable laws and regulations, including the State uniform accounting system, in its financial and fiscal operations.

Even given the limitations noted above, we conducted an analysis of the Tribunal's receipts data for Fiscal Years 2024 and 2025 to determine compliance with the Act. We noted the Tribunal's receipts data did not document the date on which the payment was received for 82 of 82 (100%) receipts in Fiscal Year 2024. As such, we were unable to determine if the Tribunal deposited the receipts timely.

2025-004. **FINDING** (Receipt Processing Internal Controls Not Operating Effectively) - Continued

The Act (30 ILCS 230/2(a)) requires the Tribunal to maintain a detailed record of all moneys received, which is to include date of receipt, the payor, purpose and amount, and the date and manner of disbursement.

The Tribunal stated the issues were due to employee error and have been corrected after Fiscal Year 2024 when the issues were identified during the previous audit.

Failure to properly enter the key attributes into the State's ERP when processing a receipt hinders the reliability and usefulness of data extracted from the ERP, which can result in improper recording of revenues and accounts receivable. (Finding Code No. 2025-004, 2023-008)

**RECOMMENDATION**

We recommend the Tribunal design and maintain internal controls to provide assurance that its data entry of key attributes into ERP is complete and accurate.

**TRIBUNAL RESPONSE**

We agree with this finding. During the last audit cycle, we were advised by the auditors of certain categories/key attributes in the ERP system that were being used by the auditors for the first time to test receipts. We started to utilize those categories going forward, but because the last audit cycle was during this audit cycle, this issue remained until we were notified, and then additional attributes were begun to be populated. This issue should not be an issue during the next audit.

**STATE OF ILLINOIS**
**ILLINOIS INDEPENDENT TAX TRIBUNAL**
**SCHEDULE OF FINDINGS – PRIOR FINDINGS NOT REPEATED**
**For the Two Years Ended June 30, 2025**

**A.** **FINDING** (Inadequate Internal Controls over Census Data)

During the prior examination, the Illinois Independent Tax Tribunal (Tribunal) did not perform a reconciliation to provide assurance census data submitted to its pension and other postemployment benefits (OPEB) plans was complete and accurate.

During the current examination, we noted an immaterial issue of the untimely submission of the Fiscal Year 2024 reconciliation. As such, this matter was reported in the Tribunal's *Independent Accountants' Report of Immaterial Findings.* (Finding Code 2023-002)

**B.** **FINDING** (Lack of Adequate Controls over the Review of Internal Controls for Service Provider)

During the prior examination, the Tribunal had not implemented adequate internal controls over its service provider.

During the current examination, the Tribunal identified the Department of Innovation and Technology (DoIT) as their only service provider and performed an assessment of the impact of DoIT's System and Organization reports for Fiscal Year 2024. (Finding Code No. 2023-003, 2021-003)

**C.** **FINDING** (Weaknesses in Cybersecurity Programs and Practices)

During the prior examination, the Tribunal had not implemented adequate internal controls related to cybersecurity programs, practices, and control of confidential information.

During the current examination, the Tribunal had completed an adequate risk assessment, implemented risk reducing internal controls, and established an adequate process to review and ensure security incidents involving the Tribunal's systems or data were fully remediated and related vulnerabilities were assessed. (Finding Code No. 2023-005, 2021-005, 2019-003)

**D.** **FINDING** (Disaster Recovery Planning Weakness)

During the prior examination, the Tribunal had not established an adequate Disaster Recovery Plan and disaster recovery testing.

During the current examination, the Tribunal developed a Disaster Recovery and Business Continuity Plan and performed table top testing of its Plan during Fiscal Year 2024 and Fiscal Year 2025. (Finding Code No. 2023-006, 2021-006)