IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

In re: JOSEPH TRICKEY	)	OEIG Case # 11-00125
PRADEEP VINCENT D'SILVA	)	
JASON ROCHON	)	

OEIG FINAL REPORT (REDACTED)

Below is a final summary report from an Executive Inspector General. The General Assembly has directed the Commission to redact information from this report that may reveal the identity of witnesses, complainants or informants and "any other information it believes should not be made public." 5 ILCS 430/20-52(b).

The Commission exercises this responsibility with great caution and with the goal of balancing the sometimes competing interests of increasing transparency and operating with fairness to the accused. In order to balance these interests, the Commission may redact certain information contained in this report. The redactions are made with the understanding that the subject or subjects of the investigation have had no opportunity to rebut the report's factual allegations or legal conclusions before the Commission.

The Executive Ethics Commission ("Commission") received a final report from the Governor's Office of Executive Inspector General ("OEIG") and a response from the agency in this matter. The Commission redacted the final report and mailed copies of the redacted version and responses to the Attorney General, the Governor's Executive Inspector General and to Joseph Trickey, Pradeep Vincent D'Silva and Jason Rochon at their last known addresses.

These recipients were given fifteen days to offer suggestions for redaction or provide a response to be made public with the report. The Commission, having reviewed all suggestions received, makes this document available pursuant to 5 ILCS 430/20-52.

FINAL REPORT

I. INTRODUCTION

On February 1, 2011, the Office of Executive Inspector General received a complaint alleging that Pradeep Vincent D'Silva, a Northern Illinois University (NIU) student employee, was falsifying timesheets. Specifically, it was alleged that from mid-December 2010 through January 2011, Mr. D'Silva was on vacation in [redacted] during which time he submitted timesheets indicating that he had worked his regularly scheduled hours at NIU.

During the course of the investigation, the OEIG discovered that Jason Rochon, another NIU student worker, also submitted false timesheets and that Mr. D'Silva and Mr. Rochon's supervisor, Joseph Trickey, was aware of the falsified timesheets of both students.

The OEIG concludes that both student workers failed to adhere to NIU's timekeeping policies, and the student workers' supervisor was complicit in those violations.

II. BACKGROUND

A. NIU Student Workers Pradeep D'Silva and Jason Rochon

NIU's Information Services and Support (ISS) department employs student workers on an hourly basis to assist in department functions. Pradeep D'Silva, along with student worker Jason Rochon, worked in the ISS department during the 2010-11 school year. Both left their NIU employment on May 15, 2011.

B. Joseph Trickey

All ISS student workers including Pradeep D'Silva and Jason Rochon are supervised by ISS Supervisor Joseph Trickey, a fulltime NIU employee who has been with NIU eight years.

C. NIU Policies

NIU student workers are paid based on how many hours they report having worked on their timesheets. Timesheets are required to be signed by each student worker and his or her supervisor. A signed timesheet is relied upon as a true and accurate accounting of the time worked by a student and is ultimately used to calculate how much pay the student will receive.

With respect to their timekeeping responsibilities during their employment, under NIU policy, student workers D'Silva and Rochon had to keep accurate timesheets, were prohibited from receiving paid vacation, and, absent a waiver (referred to as an "Extra Hour Permit"), had to confine their workweek to 20 hours. As supervisor, Mr. Trickey was responsible for assuring that these policies were complied with by verifying the accuracy of Mr. D'Silva and Mr. Rochon's timesheets and enforcing any weekly hour limitations.

According to [redacted], [identifying information redacted], when she receives student worker timesheets from supervisors, she relies on the student's and the supervisor's signature to confirm that the reported hours were true and accurate reflections of the hours worked. [Redacted] also stated that if she has questions about a student's timesheet, she will direct those questions to the signing supervisor. She indicated that the students were paid based on the number of hours recorded on their timesheets. [Redacted] added that NIU policy forbids student employees from telecommuting or working additional hours to compensate for any missed regularly scheduled hours that were not worked.

III. INVESTIGATION

The OEIG conducted interviews and reviewed documentation pertaining to the timekeeping practices undertaken by ISS department student workers D'Silva and Rochon during the 2010-11 school year.

A. Pradeep D'Silva's Timesheets

The investigation revealed that from December 10, 2010, to January 31, 2011, the time period in which he was on his vacation to [redacted], Pradeep D'Silva submitted timesheets attesting to having worked 156.5 hours.[1] Mr. D'Silva's timekeeping forms reflected his signature as well as that of Mr. Trickey. In addition, investigators discovered that two of Mr. D'Silva's timesheets during this period indicated that he had worked 37.5-hour work weeks despite being limited to 20 hours per week as an international student.[2]

On May 9, 2011, Mr. D'Silva was interviewed regarding the timesheets he submitted. During the interview he stated that in fact he did not work the hours reflected on the timesheets because he was in [redacted], but that his supervisor (Mr. Trickey) was aware of this fact and approved the submission of the timesheets on the condition that Mr. D'Silva would make up the missed hours. Mr. D'Silva's passport confirms he was out of the country.

B. Jason Rochon's Timesheets

From October 1-10, 2010, [redacted], Mr. Rochon submitted timesheets attesting to having worked his regularly scheduled hours.[3] By his own admission, Mr. Rochon recalls that he did not come into work on the five days during which he logged hours, and although he did some work remotely, he did not work to the extent of the time that he logged.

In addition, Mr. Rochon acknowledged that he had acquired an Extra Hour Permit, which allowed him to log up to 65 hours per biweekly work period. Mr. Rochon's timesheets show that on three occasions, his timesheets logged 67.5 hours on a biweekly basis.[4]

All of Mr. Rochon's timesheets, as well as his Extra Hour Permit, were signed by Mr. Rochon and Mr. Trickey.

C. Joseph Trickey's Oversight of Student Worker Timesheets

On May 25, 2011, Mr. Trickey was interviewed regarding his oversight of Student Worker timesheets. Mr. Trickey acknowledged that he was the timekeeper for ISS, but because he never had timekeeping training, he lacked complete familiarity with NIU timekeeping policies. Mr. Trickey stated (while laughing) during the interview that there was an "inside joke" in his department as "there is no such thing as policies [sic] with us." Mr. Trickey recognized that his timekeeping responsibilities included reviewing the timesheets of student workers, but he stated that he would only review the timesheets to verify that the employee had correctly listed his or her name, departmental and business unit codes, and the date range. Mr. Trickey would then

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[1] Mr. D'Silva submitted four biweekly timesheets covering these time periods: (1) December 1-15, 2010; (2) December 16-31, 2010; (3) January 1-15, 2011; and (4) January 16-31, 2011.

[2] Those timesheets covered the following pay periods: (1) December 1-15, 2010 and (2) January 1-15, 2011.

[3] Mr. Rochon submitted one biweekly timesheet covering this time period: October 1-15, 2010.

[4] Those timesheets covered the following pay periods: (1) December 1-15, 2010; (2) January 1-15, 2011; and (3) February 1-15, 2011.

sign the timesheets and forward them to [redacted] [identifying information redacted]. Mr. Trickey stated that when he reviewed timesheets, he was not "concerned" with the number of hours that an employee logged unless the employee logged overtime or time-off. Mr. Trickey explained that when he signed timesheets, he was "just signing" them, and that his signature was not attesting to the fact that the employee actually worked the hours logged. When asked what he thought his signature certified, Mr. Trickey responded, "in this environment, who knows." Investigators specifically asked Mr. Trickey if he was aware that student workers D'Silva and Rochon submitted timesheets reflecting work that was not performed. Mr. Trickey admitted he was aware, and admitted signing all of the timesheets knowing that the students had not worked the hours. Mr. Trickey stated that he signed them on the condition that the students would make up the hours at a later date, but he had no formal policy or practice for verifying that the students ever made up the hours.

IV. ANALYSIS

The OEIG investigation uncovered that the students were logging time on their timesheets that they did not work and logging time that exceeded the applicable workweek hour limits (which varied for Mr. D'Silva and Mr. Rochon because Mr. Rochon acquired an Extra Hour Permit allowing him to work up to 65 hours in a biweekly pay period). The investigation also revealed that the students' supervisor, Mr. Trickey, was aware of the submission of false and excessive timesheets, and was complicit in these activities by signing the timesheets knowing they were false and representing to [redacted] that the student workers should be paid for the hours reflected on the timesheets.

A. Student Worker Pradeep D'Silva Submitted False Timesheets, Signed by Joseph Trickey, for Days that He was on Vacation in [redacted] and Logged Hours in Excess of That in Which He was Permitted to Work

The investigation revealed that for the time period of December 10, 2010, to January 31, 2011, Pradeep D'Silva submitted four timesheets attesting to having worked 156.5 hours, despite being on vacation to [redacted] and doing no work during that time. Accordingly, the allegation that Mr. D'Silva violated NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1)[5] and Student Employment Guide § V[6] by submitting four falsified timesheets is **FOUNDED.**

In addition, investigators discovered that two of timesheets Mr. D'Silva – timesheets covering the periods of December 1-15, 2010, and January 1-15, 2011 – submitted during this period logged 37.5-hour work weeks despite him being limited to 20 hours per week as an international student. Therefore, in light of the fact that Mr. D'Silva logged more than 20 hours per work week, which is prohibited of international students, the allegation that he violated NIU

[5] The NIU Board of Trustee Regulations Sec. IV(E)(4)(c)(1) states: "All student employees shall fully comply with all: -- applicable state and federal laws[;] -- policies, regulations and decisions of the Board of Trustees[; and] -- policies, regulations and decisions of the president or a designee."

[6] Student Employment Guide § V states: "It is the responsibility of the employee to fill out timesheets in accordance with proper procedures and guidelines. Time must be reported to the nearest one hundredth (.01) of an hour."

Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and Student Employment Guide § III(B)[7] is **FOUNDED**.

B. Student Worker Jason Rochon Submitted False Timesheets, Signed by Joseph Trickey, for Days that He was Not in the Office and Logged Hours in Excess of That in Which He was Permitted to Work

Mr. Rochon logged time on five days during the first biweekly pay period in October 2010 when he was out of the office [redacted]. Mr. Rochon acknowledged that the actual hours that he worked fell short of the hours that he logged on his timesheet for the time period of October 1-15, 2010. Accordingly, the allegation that Mr. Rochon violated NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and Student Employment Guide § V by submitting a falsified timesheet is **FOUNDED.**

In addition, Mr. Rochon's Extra Hour Permit, signed by Mr. Trickey, authorized Mr. Rochon to work up to 65 hours per biweekly pay period. Regardless of this restriction, Mr. Rochon's timesheets, also signed by Mr. Trickey, logged 67.5 hours on three biweekly pay periods: (1) December 1-15, 2010; (2) January 1-15, 2011; and (3) February 1-15, 2011. Therefore, by logging more than 65 hours per biweekly pay period, the allegation that Mr. Rochon violated NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and Student Employment Guide § III(B) is **FOUNDED.**

C. Joseph Trickey Was Not Familiar with and Failed to Comply with NIU Policies on Student Timekeeping

Mr. Trickey acknowledged he lacked complete familiarity with NIU timekeeping policies and that lack of familiarity was evident by his conduct, despite knowing that his timekeeping responsibilities included reviewing and signing the timesheets of student workers. In fact, Mr. Trickey said that he only reviewed student-worker timesheets to verify the employee's name, the departmental and business unit codes, and the date range; he did not concern himself with the number of hours that an employee logged unless the employee logged overtime or time off. Mr. Trickey explained that when he signed timesheets, he was "just signing" them and that "who knows" what his signature meant.

However, Mr. Trickey was not merely nonchalant in reviewing timesheets; Mr. Trickey also signed five timesheets that he knew falsely represented time worked: (1) Mr. Rochon's October 1-15, 2010 timesheet; (2) Mr. D'Silva's December 1-15, 2010 timesheet; (3) Mr. D'Silva's December 16-31, 2010 timesheet; (4) Mr. D'Silva's January 1-15, 2011 timesheet; and (5) Mr. D'Silva's January 16-31, 2011 timesheet. Accordingly, by his actions in authorizing falsified student-worker timesheets in violation of Student Employment Guide § V, the

[7] Student Employment Guide § III(B) states: "Student employees may generally work a maximum of 20 hours per week, while classes are in session. The 20 hour per week maximum may be increased by the Student Employment office if an Excess Hour Permit has been completed and approved." As to international students, it further states: "The maximum number of hours that an international student may work is 20 hours a week, including during vacation periods."

allegation that Mr. Trickey violated his obligations under the Code of Ethics for Operating Staff[8] is **FOUNDED**.

Further, by signing the timesheets without regard to the amount of hours logged, he authorized payment to student workers exceeding the hour limitations placed on those student workers. Specifically, Mr. Trickey signed the following five timesheets with excessive hours: (1) Mr. D'Silva's December 1-15, 2010 timesheet; (2) Mr. Rochon's December 1-15, 2010 timesheet; (3) Mr. D'Silva's January 1-15, 2011 timesheet; (4) Mr. Rochon's January 1-15, 2011 timesheet; and (5) Mr. Rochon's February 1-15, 2011 timesheet. By signing these timesheets, Mr. Trickey authorized Mr. D'Silva to work more than 20 hours per week in contravention of the Student Employment Guide § III(B), and authorized Mr. Rochon to work more than 65 hours per biweekly pay period as dictated by his Extra Hour Permit in contravention of the Student Employment Guide § III(B), and therefore the allegation that Mr. Trickey violated his obligations under the Code of Ethics for Operating Staff is **FOUNDED**.

V. CONCLUSIONS

Based on its investigation, the OEIG issues the following findings.

Regarding the submission of Pradeep D'Silva's December 1-15, 2010 biweekly timesheet, which included falsified time beginning on December 10, 2010, as well as hours in excess of 20 hours per week:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing the falsified student-worker timesheet knowing that the student did not work the reported hours, which contravened the Student Employment Guide § V.

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing a timesheet that logged over 20 hours by an international student worker and for knowing that an international student worker was working more than 20 hours per week, which contravened the Student Employment Guide § III(B).

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § V by signing and submitting the falsified timesheet knowing that he did not work the reported hours.

[8] The NIU Code of Ethics for Operating Staff (Civil Service), adopted Aug. 8, 2002, states: "The Operating Staff shall be honest and ethical in the performance of their assigned duties. Further, Operating Staff shall be trustworthy and abide by all Statute[s] and Rules as established by the State University Civil Service System (SUCSS), and by those policies and procedures established by the Board of Trustees and the constitution of NIU."

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § III(B) by signing and submitting the timesheet that logged over 20 hours in a work week.

Regarding the submission of Pradeep D'Silva's December 16-31, 2010 biweekly timesheet, which included falsified time on every day on which time is logged:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing the falsified student-worker timesheet knowing that the student did not work the reported hours, which contravened the Student Employment Guide § V.

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § V by signing and submitting the falsified timesheet knowing that he did not work the reported hours.

Regarding the submission of Pradeep D'Silva's January 1-15, 2011 biweekly timesheet, which included falsified time on every day on which time is logged, as well as hours in excess of 20 hours per week:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing the falsified student-worker timesheet knowing that the student did not work the reported hours, which contravened the Student Employment Guide § V.

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing a timesheet that logged over 20 hours by an international student worker and for knowing that an international student worker was working more than 20 hours per week, which contravened the Student Employment Guide § III(B).

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § V by signing and submitting the falsified timesheet knowing that he did not work the reported hours.

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § III(B) by signing and submitting the timesheet that logged over 20 hours in a work week.

Regarding the submission of Pradeep D'Silva's January 16-31, 2011 biweekly timesheet, which included falsified time on every day on which time is logged:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing the falsified student-worker timesheet knowing that the

student did not work the reported hours, which contravened the Student Employment Guide § V.

- **FOUNDED** – Pradeep D'Silva violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § V by signing and submitting the falsified timesheet knowing that he did not work the reported hours.

Regarding the submission of Jason Rochon's October 1-15, 2010 biweekly timesheet, which included falsified time from October 1-10, 2010:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing the falsified student-worker timesheet knowing that the student did not work the reported hours, which contravened the Student Employment Guide § V.

- **FOUNDED** – Jason Rochon violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § V by signing and submitting the falsified timesheet knowing that he did not work the reported hours.

Regarding the submission of Jason Rochon's December 1-15, 2010 biweekly timesheet, which logged 67.5 hours in a biweekly pay period:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing a timesheet that logged more than 65 hours per biweekly pay period for a student worker and by knowing that the student worker worked those hours, which contravened the Student Employment Guide § III(B).

- **FOUNDED** – Jason Rochon violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § III(B) by signing and submitting the timesheet that logged more than 65 hours per biweekly pay period.

Regarding the submission of Jason Rochon's January 1-15, 2011 biweekly timesheet, which logged 67.5 hours in a biweekly pay period:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing a timesheet that logged more than 65 hours per biweekly pay period for a student worker and by knowing that the student worker worked those hours, which contravened the Student Employment Guide § III(B).

- **FOUNDED** – Jason Rochon violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § III(B) by signing and submitting the timesheet that logged more than 65 hours per biweekly pay period.

Regarding the submission of Jason Rochon's February 1-15, 2011 biweekly timesheet, which logged 67.5 hours in a biweekly pay period:

- **FOUNDED** – Joseph Trickey violated the NIU Code of Ethics for Operating Staff by signing a timesheet that logged more than 65 hours per biweekly pay period for a student worker and by knowing that the student worker worked those hours, which contravened the Student Employment Guide § III(B).

- **FOUNDED** – Jason Rochon violated the NIU Board of Trustee Regulation Sec. IV(E)(4)(c)(1) and the Student Employment Guide § III(B) by signing and submitting the timesheet that logged more than 65 hours per biweekly pay period.

VI. RECOMMENDATIONS

In light of these findings, the OEIG recommends that NIU ISS Supervisor Joseph Trickey be disciplined for his submission of falsified student-worker timesheets and breaches of the student-worker hour limits.

Further, for their respective falsification of timesheets and logging of time in excess of permitted hours, the OEIG recommends that a letter of reprimand be placed in the personnel files of former student employees Pradeep D'Silva and Jason Rochon, and that they be prohibited from being rehired prior to remedial timekeeping training.

No further investigative action is needed and this case is considered closed.

NIU
NORTHERN
ILLINOIS
UNIVERSITY

CONFIDENTIAL

December 20, 2011

Erin K. Bonales, Deputy Inspector General
Office of Executive Inspector General
32 West Randolph Street, Suite 1900
Chicago, IL 60601

RE: Complaint Number 11-00125

Dear Ms. Bonales:

Thank you for your correspondence of December 1, 2011 regarding conveying the Final Report of the above captioned complaint. I serve as Vice President of Administration and Human Resources and as the Ethics Officer for the university. In that capacity, NIU President John G. Peters has asked me to coordinate our response to the Final Report.

I have attached the OEIG Response Form to this letter, indicating that we plan to implement the recommendations outlined in the OEIG letter upon completion of our internal investigation and review of the records as outlined in your report. As such, we request additional time to complete follow up measures, which we expect to conclude within 30 days. Thereafter, we will provide the details of final actions taken.

On behalf of President Peters, we appreciate your investigation of this matter and the opportunity to coordinate the university response with your office.

Sincerely,

Steven D. Cunningham, Vice President
Administration and Human Resources
and Ethics Officer

cc: John G. Peters, President

OFFICE OF EXECUTIVE INSPECTOR GENERAL
for the Agencies of the Illinois Governor
Ricardo Meza, Executive Inspector General • www.inspectorgeneral.illinois.gov

OEIG RESPONSE FORM

Case Number: 11-00125 Return By: _____

Please check the box that applies.

☐ We have implemented all of the OEIG recommendations:
(Provide details regarding action taken.)

☒ We will implement all of the OEIG recommendations but will require additional time. We will report to OEIG within 30 days from the original return date:
(Provide details regarding action planned / taken.)

(see attached letter dated December 20, 2011)

(over)

*** IF YOU WISH TO DEVIATE FROM OEIG RECOMMENDATIONS, YOU MUST WAIT UNTIL RECEIVING A RESPONSE FROM THE OEIG.**

☐ We are implementing the OEIG recommendations however, we prefer to deviate as follows:

(Provide details regarding action planned / taken and proposed alternate(s).)

☐ We do not wish to implement any of the OEIG recommendations and prefer to deviate as follows:

(Explain why and provide details of alternate plan.)

	Vice President, Administration and Human Resources Northern Illinois University
Signature	Print Agency and Job Title
Steven D. Cunningham	December 20, 2011
Print Name	Date

* We will respond to your proposed alternate plan within 30 days of its receipt.

Northern Illinois University
Human Resource Services

1515 West Lincoln Highway
DeKalb, Illinois 60115-2828
815-753-6000
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humanresources@niu.edu
www.hr.niu.edu

CONFIDENTIAL

January 20, 2012

Erin K. Bonales, Deputy Inspector General
Office of Executive Inspector General
32 West Randolph Street, Suite 1900
Chicago, IL 60601

RE: Complaint Number 11-00125

Dear Inspector Bonales:

This report is in response to your correspondence of December 1, 2011, regarding the above captioned complaint. I serve as Vice President of Administration and Human Resources and as the Ethics Officer for the university. In that capacity, NIU President John G. Peters has asked me to provide oversight of the investigation, response, and follow-up actions regarding this matter. As indicated in my December 20, 2011 correspondence with your office, NIU's internal investigation has been completed. Accordingly, I would like to summarize our findings and the status of follow-up action as recommended in the Final Report. President Peters has been personally briefed by me on this matter and concurs with the findings and actions taken by the university.

The university conducted an investigation of this matter following and in response to the Office of the Executive Inspector General (OEIG) Final Report and findings concerning employee Joseph Trickey and former student employees, Pradeep D'Silva and Jason Rochon. The internal investigation included a thorough review of the summary, analysis, and evidence of the case provided in your December 1 Final Report of Case # 11-00125. Supplemental interviews were also conducted with staff member Joseph Trickey.

Following a thorough analysis of the information received, it was determined that the findings established by the OEIG report were the result of several factors including departmental practices that Mr. Trickey followed in processing timesheets. Accordingly, the investigation found that Mr. Trickey was not solely responsible for the actions that led to the findings in the OEIG report, but that the recommendations of the report were appropriate given the circumstances documented. Additionally, it was determined that none of the parties intended to receive or authorize pay for work time that would not actually be performed. As part of the follow-up process, the university is taking steps to assure that all departmental personnel understand and comply with applicable policies and procedures.

In consideration of the importance of appropriate work-time reporting and adherence to university policies related to the documentation of time worked, a full summary of measures taken is outlined below (including implementation of the recommendations contained in the OEIG Final Report):

Northern Illinois University is an Equal Opportunity/Affirmative Action Institution.

- ISS Supervisor Joseph Trickey will be disciplined (pursuant to the OEIG recommendation) in the form of a three work day unpaid suspension, accompanied by a written notice of suspension that will remain in his permanent personnel file.

- Letters of reprimand, summarizing work-time limitations and reporting requirements for student employees, will be issued to former student employees Pradeep D'Silva and Jason Rochon (pursuant to the OEIG recommendation).

- Supplemental and customized timekeeping training will be provided to Supervisor Trickey and former student employees D'Silva and Rochon (pursuant to the OEIG recommendation), and their acknowledgement of procedural compliance will be a required condition of future employment.

- In addition to the measures outlined above, the university will implement general timekeeping compliance training with the Information Services and Support department involved with the OEIG investigation, in response to a general need to assure that correct practices are maintained by all responsible personnel.

I should also note that the university is planning implementation of supplemental work-time reporting software as part of the payroll information system development process, with implementation planned for completion within the next 18 months. We believe that utilization of this system will enhance university-wide compliance with applicable timekeeping and work-time documentation policies and procedures.

On behalf of President Peters, we appreciate your assistance in this matter. The university considers this matter closed upon completion of the follow-up measures outlined above. However, we will continue to monitor work-time documentation and procedural compliance with respect to the Information Services and Support office and the subjects considered in this investigation.

Sincerely,

Steven D. Cunningham, Vice President
Administration and Human Resources
Ethics Officer

cc: John G. Peters, President

RECEIVED
APR 13 2012
EXECUTIVE
ETHICS COMMISSION

IN THE EXECUTIVE ETHICS COMMISSION
OF THE STATE OF ILLINOIS

IN RE: Jason Rochon) 11-00125

RESPONDENT'S SUGGESTIONS FOR REDACTION / PUBLIC RESPONSE

Please check the appropriate line and sign and date below. If no line is checked the Commission will not make your response public if the redacted report is made public.

_X_ Below is my public response. Please make this response public if the summary report is also made public; or

_____ Below are my suggestions for redaction. I do not wish for these suggestions to be made public.

[signed]
Respondent's Signature

04/11/2012
Date

Instructions: Please write or type suggestions for redaction or a public response on the lines below. If you prefer, you may attach separate documents to this form. Return this form and any attachments to:

Illinois Executive Ethics Commission
401 S. Spring Street, Room 513 Wm. Stratton Building
Springfield, IL 62706

I am happy over the outcome of the investigation that I requested to be submitted. After knowledge of the wrong-doings and misconduct, I felt obligated to seek an Ethics Investigation against all parties, and bring integrity back to a University Department where and when integrity was void. Thank You,

[signed]