

Audit Observation Status Report – Tuition and Book Reimbursement

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
1.1	Relevant constructive changes instituted through the 2007 Administrative Memorandum and recommendations throughout the course of this audit that serve to clarify and enhance the efficiency and effectiveness of program delivery should be reflected in a new Tuition Reimbursement policy and taken to Council for official adoption.	<p><i>Propose a new Tuition Reimbursement Policy for official Council adoption that reflects and improves upon the constructive changes in the 2007 Administrative Memorandum. This involves coordination with stakeholder groups such as Labor-Management, Human Resources, and City Attorney’s Office in order to achieve a policy that provides coherent standards, consistent administration, equity in participation, and leverage as a strategic investment.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	Tuition Reimbursement will be referenced in the benefits section of HR’s re-write of the Rules and Regs, which must be adopted by Council. A detailed revised Tuition Reimbursement policy will be contained in a separate HR guideline, which must be approved by the City Manager.	No. Approval expected December 2014 as part of HR’s re-write of the Rules and Regs (Specifically Rules 1, 2, 3 and 4.
2.1	Revisiting this purpose statement to make it more congruent with the purpose of TLC and the over-arching City purpose will make it more powerful. Suggestions to consider for enhancing this	<p><i>1. Revise the purpose statement to make it more congruent in supporting strategic talent management and focused to specifically align with the purpose statement of the TLC and the City. Work with department representatives to draft a refined purpose statement that aligns to organizational strategy and priorities.</i></p>	A revised purpose statement has been drafted and will be a part of the new HR Guideline on Tuition Reimbursement.	No. Approval expected December 2014 as part of HR’s re-write of the Rules and Regs.

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	<p>statement could include identification of how the City, employees, and citizens benefit from the program such as:</p> <ol style="list-style-type: none"> 1. The benefit of a better educated workforce. A better educated workforce is more knowledgeable, efficient, and qualified to handle day-to-day tasks and provide superior service to the community. 2. Employees get the skills they need to qualify for higher positions, while the City gets a more highly-educated and capable workforce. 3. A Tuition Reimbursement benefit can help attract and retain the type of employee who is ambitious and willing to learn new things. 4. As employees retire and otherwise separate from the City, finding qualified candidates for these positions can be a challenge. Tuition 	<p><i>2. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 12/1/2012</i></p>		

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	reimbursement programs can assist employees and the City in succession planning through attaining the education and experience they need to guide the City in the future.			
3.1	TLC should develop key measures of performance to determine what the Tuition and Book Reimbursement Program is accomplishing and whether or not its purpose is met and goals are realized on an annual basis. This process can facilitate maintaining focus on program purpose and goals and can also support development and justification of budgeted dollars by indicating how the City and Tempe taxpayers benefit from the program. Performance measures should capture the most important aspects of the program's purpose and priorities.	<p><i>1. Develop key measures of performance to determine what the Tuition and Book Reimbursement Program is accomplishing and whether or not its purpose is met and goals are realized on an annual basis. Performance measures will indicate the program's effectiveness and demonstrate the program's value to the organization and employees.</i></p> <p><i>2. Utilize the performance measures as part of the proposed policy request process with stakeholders.</i></p> <p><i>TLC has been researching performance measurements for Tuition Assistance Programs, both private and public sector, to develop quantitative tools. Employee retention, promotions, and job performance are the commonly measured impacts of a tuition assistance program. However, research indicates that this benefit program is generally under-measured regarding its effectiveness and impact.</i></p>	A limited number of useful and meaningful performance measures have been identified that will provide strategic information about the program.	No. Measurements will be in place for use by June 2014.

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		<p><i>Key measures of performance could include tracking participant data over time to see how tuition assistance impacts the following:</i></p> <ul style="list-style-type: none"> • <i>Retention rates of participants compared with nonparticipants</i> • <i>Promotion rates of participants compared with nonparticipants</i> • <i>Capacity for promotion (e.g. percentage of employees in a job family possessing a required or preferred license/certification/degree for next-level position)</i> • <i>Years of service of participants compared with nonparticipants</i> • <i>Performance ratings or inclusion in e-Performance Plans (self-reported by employee during pre-approval process)</i> • <i>Distribution amount</i> • <i>Participation rates</i> • <i>Value perception of participants – survey model</i> • <i>Annual demographics</i> • <i>Expenditures per class/credit accrued</i> • <i>Expenditures per certificate/degree attained</i> • <i># of employees using the program as a percentage of eligible employees</i> • <i>Tuition reimbursement expenditures as a percentage of total expenditures</i> • <i>Expenditures per employee enrolled</i> 		

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		<i>ESTIMATED TIMELINE: by 2/15/13 (does not require official Council adoption)</i>		
4.1	TLC management should involve all stakeholders to determine if providing tuition benefits to DROP participants is congruent with a clarified program purpose. At minimum, consideration should be given to the value of providing the tuition benefit for DROP employees in the final year of their declared employment term since these funds would have to be returned to the City upon termination in accordance with current policy.	<p><i>1. With stakeholders, develop a new Tuition Reimbursement Policy for official Council adoption that indicates a determination as to whether providing tuition benefits to DROP participants is congruent with the clarified program purpose. This would promote equity regarding the “repayment” component and align the policy and practices with the clarified purpose of the tuition assistance program.</i></p> <p><i>2. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	Efforts are continuing to adopt a policy to address DROP participants’ eligibility for the tuition reimbursement benefit. Will be included in the new HR Guideline.	No. Approval expected December 2014 as part of HR’s re-write of the Rules and Regs.
5.1	The Repayment Requirement section of the Tuition and Book Reimbursement policy should be revised and clarified to ensure a process is in place that requires equitable treatment for all employees voluntarily leaving service. All benefits paid by the City to employees within 12 months of their termination date	<p><i>1. Revise and clarify the repayment section of the policy to ensure equitable treatment for all employees voluntarily leaving service.</i></p> <p><i>2. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>3. In partnership with Financial Services, implement a consistent process to recover repayment from the employee, including any</i></p>	A repayment policy has been drafted and will be included in the HR Guideline on Tuition Reimbursement. A repayment process has been implemented to recover tuition	No. Approval expected December 2014 as part of HR’s re-write of the Rules and Regs.

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	should be repaid. Where the employee's last paycheck (or accrued leave) is insufficient to cover the entire amount due, any residual balances due the City should be recovered through a personal payment from the employee or the establishment of a monthly repayment schedule managed and monitored by Financial Services.	<p><i>residual balances due. Repayment methods could include personal payment, a monthly repayment schedule and/or third-party collections.</i></p> <p><i>ESTIMATED TIMELINE:</i> <i>Items 1 and 2: by 3/31/13</i> <i>Item 3: by 12/1/13</i></p>	reimbursement amounts in the event of overpayment or employee's separation from the City.	
6.1	<p>The policy should clearly state that in order to be eligible for reimbursement, coursework must be through colleges or universities that are accredited. In addition, in order to provide flexibility and be all-encompassing, the following additional statement should be considered for inclusion in the policy:</p> <p>.....or any accrediting association recognized by the US Department of Education or other similar international body.</p>	<p>1. <i>To provide sufficient flexibility and articulation as to the institution's eligibility, research and encompass into the policy all eligible education sources, in addition to the current list of accrediting bodies. (Example: an accredited college or institution or any accrediting association recognized by the US Department of Education or similar international body.)</i></p> <p>2. <i>Implement policy language that clearly states that, in order to be eligible for reimbursement, coursework must be through colleges or universities that are accredited through bodies identified in the clarified policy.</i></p> <p>3. <i>Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p>	A revised accreditation policy section has been drafted and will be included in the HR Guideline on Tuition Reimbursement. A new field in the pre-approval section of ELM is planned to identify the accrediting agency.	No. Approval expected December 2014 as part of HR's re-write of the Rules and Regs.

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		<i>ESTIMATED TIMELINE: by 3/31/13</i>		
7.1	The policy for licenses and certifications should be revised to provide more specific requirements or criteria that can be consistently applied. TLC Management should ensure that the requirements relate to the program's purpose.	<p><i>1. Provide alignment with program purpose and clear articulation as to the eligibility of certifications and licenses. This includes consideration of including licenses and certifications as eligible for tuition reimbursement.</i></p> <p><i>2. Identify and provide specific requirements or criteria for consistent administrative review and policy compliance.</i></p> <p><i>3. Implement policy language that objectively articulates the subjective portions of the policy relating to licenses and certifications.</i></p> <p><i>4. Include in the proposed policy specific eligible sources and governing associations for licenses and certification.</i></p> <p><i>5. Evaluate the administrative interpretation of the language in the 2007 Administrative Memorandum and the interdepartmental process that affect the assessment regarding the eligibility of the license or certification in:</i></p> <ul style="list-style-type: none"> <i>- assisting "the employee in becoming more eligible for promotions", and</i> <i>- being "identified as 'required' or 'preferred' on a current City job description"</i> 	The criteria for licenses and certifications has been expanded and clarified in a proposed guideline.	No. Approval expected December 2014 as part of HR's re-write of the Rules and Regs.

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		<p><i>6. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>		
8.1	<p>Once revised policies and procedures are officially approved, they need to be effectively communicated to all parties involved in the process of administering the Tuition and Book Reimbursement Program including: supervisors, Training Administrators, TLC staff and Payroll. TLC Management should ensure that TLC staff only pre-approve course work that complies with policies and procedures in effect.</p>	<p><i>Upon official approval by Council, deploy a communication plan regarding the new policies and procedures to all parties involved in the process of administering and participating in the Tuition and Book Reimbursement Program including: employees, supervisors, Training Administrators, TLC staff, and Payroll. The communication components will be customized for each stakeholder role and function.</i></p> <p><i>ESTIMATED TIMELINE:</i></p> <ol style="list-style-type: none"> <i>1. Develop implementation plan by 1/31/13.</i> <i>2. Develop communication components by 2/28/13.</i> <i>3. Deploy communication plan within 30 days of official Council approval.</i> 	<p>Must be done after official policy adoption.</p>	<p>No. Awaiting Official Council adoption. Expected December 2014.</p>
9.1	<p>Eligibility criteria for coursework should be reviewed and revised to directly tie into the purpose of the Tuition and Book Reimbursement program. A statement by the employee articulating how their choice of coursework, license or certification supports the</p>	<p><i>Review and revise eligibility criteria to align coursework with the clarified purpose of the program. Explore expanding the pre-approval fields in PeopleSoft ELM to provide an avenue for the employee to state how their choice of coursework, license, or certification supports the purpose of the program.</i></p> <p><i>ESTIMATED TIMELINE: by 12/1/12</i> <i>Does not require official adoption by Council;</i></p>	<p>A pre-approval field in ELM is being explored to address eligibility criteria.</p>	<p>No. Programming changes in ELM are expected by June 2014.</p>

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	purpose of the program could be compiled and provided for review and approval by the employee's supervisor and TLC during initial pre-approval processing.	<i>however, the sequence of implementation is impacted by a revised purpose statement being adopted by Council.</i>		
10.1	The responsibility should be placed upon the employee to formally identify what degree program they are pursuing and provide an example of what specific job description includes the degree as required or preferred.	<i>Explore expanding the pre-approval fields in PeopleSoft ELM to have the employee:</i> <ul style="list-style-type: none"> • <i>Identify the degree or license/certification, and</i> <i>ESTIMATED TIMELINE: by 11/30/12</i>	A pre-approval field in ELM is being explored for identification of the degree program.	No. Programming changes in ELM are expected by June 2014.
10.2	TLC should work with Finance and Technology to revise the ELM input form to require the identification of the degree program prior to submission for pre-approval.	<i>Explore expanding the pre-approval fields in PeopleSoft ELM to have the employee:</i> <i>Identify what specific job description includes the degree as required or preferred. (Pending that this is part of the revised policy and noting that there are disconnect between job description updates/content and possible strategic uses of the tuition program.)</i> <i>ESTIMATED TIMELINE: by 11/30/12</i>	A pre-approval field in ELM is being explored for identification of the degree program.	No. Programming changes in ELM are expected by June 2014.
10.3	The policy should be expanded to address the eligibility of exams and courses taken to become eligible for degree programs.	<i>1. Through policy revision, elaborate on the eligibility of courses and/or exams that are required prior to starting a degree program (such as the GRE exam or an evaluation course used to determine acceptance into a degree program) in order to consistently apply eligibility and administrative practices.</i>	Proposed policy changes address exams and placement courses. A new field in the pre-approval section in ELM is	No. Official approval expected by December 2014. ELM changes expected by June 2014.

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		<p><i>2. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	planned to provide the ability to identify entry exams/placement courses.	
10.4	TLC should review the capacity issue with all stakeholders and City management to determine if the reimbursement for the pursuit of degrees with very limited application to a City job should be capped by the City.	<p><i>1. Identify the degrees, licenses, or certifications that may have very limited application to City positions.</i></p> <p><i>2. Review the capacity issue with all stakeholders and City management to determine if reimbursement for the pursuit of degrees, licenses or certifications with very limited application to a City job should be capped by the City.</i></p> <p><i>3. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	Discussions still in progress.	No. Discussions expected by December 2014.
11.1	Expand the policy to provide a more inclusive listing of examples of allowed and disallowed fees and materials. Develop standards for the documentation needed as proof that materials/supplies are required for coursework taken.	<p><i>Propose an expense eligibility policy that:</i></p> <p><i>1. Provides clearer guidance to employees and approvers regarding supplies, related fees and documentation proof:</i></p> <ul style="list-style-type: none"> <i>• For supplies, include additional recent examples of allowable supplies;</i> <i>• Expand upon the proof that is necessary to justify that the supplies are required; and,</i> <i>• For related fees, provide a listing of allowable</i> 	Policy has been developed to address the issues with material and fees. Will be included in the HR Guideline.	No. Official approval expected by December 2014.

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		<p><i>fee types.</i></p> <p><i>2. Addresses the allowance of evolving fee types (i.e., technology, registration, processing).</i></p> <p><i>3. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>		
12.1	<p>The pre-approval section of the policy should be strengthened to clearly state that the employee is assuming the risk that they may not be reimbursed through the program should they embark upon coursework that is not pre-approved by their supervisor or TLC and that the responsibility to obtain pre-approval before commencing their coursework lies with the employee.</p>	<p><i>1. Explore the risks to the City regarding the “unknown” pre-approvals as it creates challenges when projecting potential tuition expenses during the fiscal year. TLC periodically reviews the outstanding pre-approvals for potential reimbursements and budget expenditures/revisions.</i></p> <p><i>2. Strengthen the pre-approval section of the policy and, if feasible, the online pre-approval form, to clearly state that the employee is assuming the risk that they may not be reimbursed through the program should they embark upon coursework that is not pre-approved by their supervisor or TLC and that the responsibility to obtain pre-approval before commencing their coursework lies with the employee.</i></p> <p><i>3. Include this dimension in the proposed Tuition</i></p>	<p>Proposed policy revisions and changes to ELM programming have been developed to address these pre-approval issues.</p>	<p>No. Approval expected by December 2014. ELM programming changes expected by June 2014.</p>

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		<p><i>Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>		
12.2	<p>The policy should be clarified and state what criteria the supervisor should be reviewing prior to pre-approval. Consideration could also be given to exploring whether the pre-approval process would be more effective if TLC was the first pre-approval step, with the supervisor being secondary.</p>	<p><i>1. In the revised policy, clarify and state the criteria the supervisor should be reviewing prior to the pre-approval process. Align the pre-approval criteria to the purpose of the program and identify the specific elements as it relates to the revised policy.</i></p> <p><i>2. Provide a “Supervisor Tuition Pre-Approval Review Checklist” as part of educating supervisors on the revised policy and their related roles in supporting the policy.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<p>Proposed policy revisions have been developed to specify the supervisors’ responsibilities when approving a TR application.</p> <p>A supervisor’s checklist has been drafted to correspond to the cover sheet submission.</p>	<p>No. Approval expected by December 2014.</p> <p>No. Approval expected by December 2014.</p>
12.3	<p>An expiration time limit for the pre-approval should be identified in the policy.</p>	<p><i>1. Include an expiration time-limit for the pre-approval in the revised policy in order to identify the applicable policy at the time the employee submitted for pre-approval and the subsequent submission for reimbursement.</i></p> <p><i>2. Explore the feasibility of including an automatic expiration in PeopleSoft ELM for pre-approved courses.</i></p> <p><i>3. Include this dimension in the proposed Tuition</i></p>	<p>Proposed policy revisions have been developed to add an expiration date (12 months) to the pre-approval in ELM.</p>	<p>No. Approval of policy expected by December 2014. ELM programming changes expected by June 2014.</p>

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		<p><i>Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>		
13.1	<p>The grade requirement section of the policy should be clarified to specifically address whether C- grades for undergraduate and B- grades for graduate coursework are eligible for related tuition and book reimbursement including educational partnerships). This grade policy should also be strictly enforced.</p>	<p><i>1. In the revised policy, clarify the grade requirement section to specifically address the eligible grades for graduate and undergraduate coursework. Identify the eligibility of “-” and “+” grades as it relates to the policy requirement. As the plus/minus grade may affect the eligibility of the course for degree completion requirements, explore this relationship to the purpose of the tuition assistance program when identifying the clarified grade requirement.</i></p> <p><i>2. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<p>Proposed policy has been developed to address this grading issue. Minus grades will not be accepted for reimbursement purposes.</p>	<p>No. Approval of policy expected by December 2014.</p>
14.1	<p>The intention of requiring employees to submit reimbursement requests to Training Administrators within twelve months of course completion should be assessed. If the intention is to reject reimbursement claims that are submitted beyond twelve months of successful course completion, this should clearly</p>	<p><i>1. In the revised policy, clearly communicate whether the reimbursement request will or will not be rejected if received by Training Administrators beyond the twelve months of successful course completion.</i></p> <p><i>2. Explore the feasibility of including this component in PeopleSoft ELM at the time the employee submits for preapproval and explore whether the online system can provide a reminder prompt to the employee to submit the</i></p>	<p>HR Guidelines will require that requests be rejected if submitted beyond the 12 month time period.</p>	<p>No. Approval of policy expected by December 2014.</p>

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	communicated in the policy and practiced.	<p><i>reimbursement before the designated eligible timeline.</i></p> <p><i>3. Determine a process for addressing the possible rejection of the reimbursement submission in order to consistently and equitably practice the stated policy.</i></p> <p><i>4. Include this dimension in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>		
15.1	<p>After the policy enhancements recommended in this report are completed and approved by Council, it would be an ideal time to provide training for all Training Administrators with concentrated focus on the tuition reimbursement process. In addition, a process should be developed to ensure the listing of Training Administrators is kept current and that new administrators are provided with essential training on a timely basis and periodic refresher training is provided for all as needed. Once Training Administrators</p>	<p><i>1. After the policy enhancements are completed and approved by Council, provide training to all Training Administrators who process Tuition Reimbursement. This gap in training occurred during the ELM transition from Training Server whereby Tuition Processors were not necessarily Training Administrators, and vice -versa.</i></p> <p><i>2. Develop a systematic process that provides coordination with Finance and Information Technology (possibly the PeopleSoft Team) and the City departments when a change occurs in the Training Administrator designation.</i></p> <p><i>ESTIMATED TIMELINE: Within 30 days of official Council approval.</i></p>	Tuition processors will be trained and a process will be implemented to address changes in TPs.	No. Policy training will be conducted subsequent to policy approval expected by December 2014.

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	<p>are adequately instructed on revised policies and procedures, Payroll should reject incomplete or unacceptable reimbursement requests and return them to the Training Administrators for amendment. Payroll staff should not spend time researching and/or requesting reimbursement documentation from various sources. It is ultimately up to the employee (followed by the Training Administrator) to ensure the necessary supporting documentation is submitted to Payroll for reimbursement.</p>			
15.2	<p>Implement a standard checklist as a tool to assist employees and Training Administrators in the reimbursement submission process. The checklist can be used as a guide to ensure all required documentation has been provided to support their reimbursement request and that it is authentic, accurate, and complete. Training Administrators should certify that they have reviewed the</p>	<p><i>1. Implement a standard checklist as a tool to assist employees, Training Administrators, and Payroll in the reimbursement submission process.</i></p> <p><i>2. Explore the feasibility of generating this checklist via PeopleSoft ELM as a possible “cover-sheet” for submitting and processing the reimbursement completely and consistently. As each institution issues a variety of forms in many different styles for payment, enrollment, grades and syllabi, the “coversheet” would help all parties quickly identify and summarize the necessary documentation.</i></p>	<p>A cover sheet has been drafted to be used in ELM that serves as a checklist/job aid for the applicant and tuition processors.</p>	<p>No. ELM programming changes are anticipated by June 2014.</p>

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	documentation provided and that it complies with policy requirements.	<i>ESTIMATED TIMELINE: by 3/31/13</i>		
16.1	Disclosure of sources and amounts of alternative funding at the pre-approval stage by employees should be encouraged, but not a strictly-enforced requirement as this information is not always accessible at this point in time by program participants.	<p><i>1. Through policy education and ongoing communication (formal and informal) to employees, encourage the disclosure of sources and alternative funding at the pre-approval stage.</i></p> <p><i>2. Explore the feasibility of auto-prompts when these related fields are not completed in PeopleSoft ELM.</i></p> <p><i>3. As complete information regarding financial aid may not be available for disclosure by employees at the pre-approval stage, identify and verify a process for an employee to disclose sources and amounts of alternative funding after the pre-approval request is submitted but before the reimbursement request is submitted to the employee's department for processing.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	Changes to ELM are anticipated to address the disclosure of sources and amounts of other aide (at the pre-approval stage if known, then again at the time of reimbursement).	No. ELM programming changes are anticipated by June 2014.
16.2	Policy language should be refined to communicate the intent that the City will not reimburse any portion of employee tuition and book costs that are funded by non-repayable alternate sources regardless of the percentage of funding. A list of examples of	<p><i>1. Propose policy language that thoroughly expresses the magnitude and intent of restrictions regarding reimbursement for any portion of employee tuition and book costs that are funded by non-repayable alternate sources, regardless of the percentage of funding.</i></p> <p><i>2. Within the proposed policy, provide a more robust listing of examples of other funding</i></p>	New policy language within the HR Guideline has been developed to address financial assistance and includes examples of other funding	No. Approval of policy expected by December 2014. ELM programming changes are expected by June 2014.

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	<p>other funding sources should be provided in the policy and on the tuition approval form and at minimum include the following:</p> <ul style="list-style-type: none"> Pell Grants Honorary Financial Rewards Scholarships GI Bill Funding 	<p><i>sources that may affect the restrictions regarding reimbursement. The list would serve to guide employees before submitting for reimbursement.</i></p> <p><i>3. Within the proposed policy, consider policy language that describes the expectations of transparent and ethical participation in the tuition reimbursement program; and, consider including policy language that describes potential consequences.</i></p> <p><i>4. Explore the feasibility of auto-prompts when these related fields are not completed in PeopleSoft ELM.</i></p> <p><i>5. Include these dimensions in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<p>sources.</p> <p>The proposed submission cover sheet includes language that requires employees to certify that all financial assistance has been disclosed with disciplinary action as a consequence for non-disclosure.</p> <p>Currently exploring whether ELM can be changed to add prompts when financial assistance fields are not completed.</p>	
16.3	<p>All employees who have been identified (or will be identified in the future) as receiving non-repayable financial aid that was not disclosed, should repay the City the amount of the duplicated aid (apart from</p>	<p><i>1. Propose policy language that thoroughly expresses the magnitude and intent of restrictions regarding reimbursement for any portion of employee tuition and book costs that are funded by non-repayable alternate sources, regardless of the percentage of funding.</i></p>	<p>All employees found to have non-repayable aid during the audit (with the exception of amnesty period) have repaid the</p>	<p>No. Approval of policy expected by December 2014.</p>

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	those employees that came forward to TLC during the specified amnesty period).	<p>2. <i>Within the proposed policy, include language that describes the expectations of transparent and ethical participation in the tuition reimbursement program; and, consider including policy language that clarifies potential consequences.</i></p> <p>3. <i>Per proposed policy, establish repayment (within 30 days of discovery or disclosure) from the employee for the amount of duplicated aid through a repayment plan (payroll deductions, direct payment to the City). For former employees, invoice for payment, and/or turn over for third-party collections.</i></p> <p>4. <i>Include these dimensions in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<p>amount owed to City.</p> <p>Proposed policy has been developed to address non-repayable financial aid.</p>	
16.4	TLC, in consultation with the City Attorney's Office, should consider revising the policy to require each tuition reimbursement and educational partnership participant to sign a release authorizing the City to obtain their financial aid records from the institution they are attending. This would help TLC detect aid that is not	<p>1. <i>In consultation with the City Attorney's Office, consider revising the policy to require each tuition reimbursement and educational partnership participant to sign a release authorizing the City to obtain their financial aid records from the institution they are attending.</i></p> <p>2. <i>Include these dimensions in the proposed Tuition Reimbursement Policy for official Council adoption.</i></p>	The proposed submission cover sheet in ELM contains language that asks the employee to grant the City the right to audit records and verify course, payment, and assistance with the	No. ELM programming changes expected by June 2014.

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	disclosed by employees. This requirement could be included in the specific language in recommendation 17.1 below.	<i>ESTIMATED TIMELINE: by 3/31/13</i>	institution. A proposed policy has been developed to address the need for the City to access employees' records at the institution.	No. Policy expected to be approved by December 2014.
16.5	When issuing RFPs for future educational partnerships, it should be clearly stated that the City requires the institution to provide a listing of all non-repayable aid provided to any cohort students.	<p><i>1. When issuing RFPs for future educational partnerships, clearly state that the City requires the institution to provide a listing of all non-repayable aid provided to any cohort students.</i></p> <p><i>2. For the CPM/ASU partnership, no recurring RFP exists as ASU is the sole-source provider of the national program; however, the employee agreement for participation can be updated to reflect revised policy that thoroughly expresses the magnitude and intent of restrictions regarding reimbursement for any portion of employee tuition and book costs that are funded by non-repayable alternate sources, regardless of the percentage of funding. The employee agreement could include policy language that describes the expectations of transparent and ethical participation in the tuition reimbursement program, along with policy language that indicates potential disciplinary consequences.</i></p>	<p>For any new educational partnerships that may begin, a new HR Guideline will be developed to address the recommendations.</p> <p>CPM is currently under constructive review and parameters will be established in a specific HR Guideline. The next CPM group is not scheduled to be recruited and selected until Fall 2014.</p>	No. Policy expected to be approved by December 2014.

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
		<p><i>ESTIMATED TIMELINE: Language stating the City's requirement of the institution to provide a listing of non-repayable aid will be incorporated in future RFPs.</i></p>		
16.6	<p>The employee agreement for educational partnerships should clearly state that the employee is expected to disclose any non-repayable financial aid received.</p>	<p><i>Update future employee agreements for education partnership participation to reflect revised policy that thoroughly expresses the magnitude and intent of restrictions regarding reimbursement for any portion of employee tuition and book costs that are funded by non-repayable alternate sources, regardless of the percentage of funding. The employee agreement could include policy language that describes the expectations of transparent and ethical participation in the tuition reimbursement program, along with policy language that indicates potential disciplinary consequences.</i></p> <p><i>ESTIMATED TIMELINE: Before launching new education partnership sessions.</i></p>	<p>The most recent educational partnership (AAS with Rio Salado) was concluded December 2013. Future partnerships parameters will be addressed through a specific HR Guideline for that customized partnership. The Guideline components will include:</p> <ul style="list-style-type: none"> • Purpose • Processes • Participation • Withdrawals • Attendance • Vendor Requirements, as related to the RFP 	<p>No. Policy expected to be approved by December 2014.</p>

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
			<ul style="list-style-type: none"> • Parameters/Restrictions • Applicant Eligibility • Selection (as applicable) • Appeals • Financial disclosures and responsibilities of all parties involved in the partnership 	
17.1	<p>An employee agreement and acknowledgement should be signed and submitted along with all other required materials for reimbursement. The following language provides an example: By my signature below: I request approval for tuition (and books/materials) for the course(s) referenced above. I understand that the City of Tempe has the right to audit my educational and financial records that may be included in my records at the institution</p>	<p><i>Modify the “signature” form and acknowledgement language generated by PeopleSoft ELM to include:</i></p> <p><i>1. Through revised policy language, formal acknowledgement of specific rules and regulations (e.g. the City’s right to audit, disclosure of other funding aid, potential consequences for program misuse/ misconduct, conditions that generate repayment, etc.) that the employee understands and agrees to participate within the program rules and regulations;</i></p> <p><i>2. An employee signature line requirement (new); and,</i></p>	<p>A proposed revised submission cover sheet has been created to include the acknowledgement language recommended, and the employees’ and Tuition Processor’s signatures.</p>	<p>No. ELM programming changes are expected by June 2014.</p>

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
	<p>attended. Any right that I have pursuant to the Family Education Rights and Privacy Act of 1974, or any similar act, is waived by acceptance of tuition reimbursement. I hereby authorize the City of Tempe to verify information regarding my course(s). I certify that I have disclosed all sources of educational financial assistance that does not require repayment and I am not requesting reimbursement for any course(s) where alternative non-repayable sources of funding have been either paid to me or credited to my educational financial accounts at the institution(s) attended. I acknowledge that if I voluntarily terminate employment (retirement included) with the City I must repay all tuition benefits that were paid out to me within the 12 months prior to my termination date.</p>	<p><i>3.The Tuition Administrator's signature (maintain - current practice.)</i></p> <p><i>ESTIMATED TIMELINE: by 12/1/12</i></p>		

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
18.1	TLC should revise the policy to include a more specific requirement and expand the detail as to what constitutes a valid receipt. The appropriate requirement should be that the employee must provide a receipt that shows the expenses were actually paid by the employee. A credit card receipt, canceled check, or other supplemental receipt should be provided by the employee showing they personally paid the expense, rather than a generic receipt that does not identify the source of payment.	<p><i>Revise the policy to include more specific requirements and expanded details as to what constitutes a valid receipt:</i></p> <ol style="list-style-type: none"> <i>1. Indication of the specific expenses that were actually paid by the employee</i> <i>2. A credit card receipt, canceled check, or other supplemental receipt showing that the employee personally paid the expense; and</i> <i>3. Receipts identifying the sources of payment.</i> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	New receipt requirements will be included in the HR Guidelines.	No. Policy expected to be approved by December 2014.
19.1	The policy and employee agreement should be revised to allow for temporary postponement of the cohort program at the employee's request due to extenuating individual circumstances (i.e., medical issues) with the allowance to continue the program when the employee becomes available.	<p><i>Revise the policy and employee agreement to allow for temporary postponement of the cohort program at the employee's request due to extenuating individual circumstances (i.e., medical issues) with the allowance to continue the program when the employee becomes available.</i></p> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<i>The specific partnership's HR Guideline will address temporary postponement.</i>	No. Policy expected to be approved by December 2014.
19.2	The policy and employee agreement should be revised to	<i>Revise the policy and employee agreement to establish specific criteria as a basis for</i>	<i>The specific partnership's HR</i>	No. Policy expected to

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
	establish specific criteria as a basis for involuntary withdrawal of an employee from a cohort by TLC.	<p><i>involuntary withdrawal of an employee from a cohort by the City. Potential criteria to consider:</i></p> <ul style="list-style-type: none"> • <i>Not meeting grade requirements for degree, license or certification completion</i> • <i>Lack of program attendance or online participation by the employee</i> • <i>Violations the City or the education institution's policies of conduct</i> <p><i>ESTIMATED TIMELINE: by 3/31/13</i></p>	<i>Guideline will address involuntary withdrawals.</i>	be approved by December 2014.
20.1	TLC should develop a more effective system to manage repayments due as a result of unsuccessful completion of cohort classes.	<p><i>Partner with Payroll to develop a more effective recovery procedure to manage repayments due as a result of unsuccessful completion of cohort classes. This approach could be similar to the "Procedures for Wage Overpayment Recovery and Wage Underpayment Reimbursement" that includes the following components: Purpose, Scope, responsibilities, Statue of Limitations, Repayment Schedule and Conditions, and Approval.</i></p> <p><i>ESTIMATED TIMELINE: by 12/1/2012</i></p>	The specific partnership's HR Guideline will address the new repayment policy for cohorts.	No. Policy expected to be approved by December 2014.
20.2	TLC should ensure that the two employees mentioned in this observation repay the City as required by policy.	<p><i>Ensure that the two employees mentioned in audit observations repay the City as required by policy. As of 9/11/12, both employees received additional emails from TLC requesting their plan for repayment.</i></p> <p><i>1. Verify whether or not repayment was made. 2. To obtain repayment, contact the employees via email with a stated deadline for indicating</i></p>	The two employees repaid the City.	Yes.

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
		<p><i>their repayment plan and the actions we will should they not respond by the prescribed date.</i></p> <p><i>ESTIMATED TIMELINE:</i> <i>Item 1 – by 10/25/12</i> <i>Item 2 – by 10/31/12</i></p>		
21.1	<p>Establish a formal, consistent, and transparent process for employees to appeal decisions they believe to be unfair or erroneous.</p>	<p><i>1. Establish a formal, consistent, and transparent process for employees to appeal both pre-approval and reimbursement decisions. Components to include and consider for the Appeal Process:</i></p> <ul style="list-style-type: none"> <i>• Timeline for Appeals and Response</i> <i>• Written and Signed Request for Appeal Process (to whom), that includes the following information:</i> <ul style="list-style-type: none"> <i>i. A clear and concise statement of the grievance and the facts upon which it is based;</i> <i>ii. The section(s) of the Tuition Reimbursement and Book Program that was violated; and,</i> <i>iii. The remedy requested.</i> <i>• Written and Signed Appeal Response that includes the following information:</i> <ul style="list-style-type: none"> <i>i. A clear and concise response to the appeal and the facts upon which it is based;</i> <i>ii. The section(s) of the Tuition Reimbursement and Book Program, which apply to the appeal and the section(s) upon which the decision is based;</i> <p><i>2. Determine if the appeal process requires</i></p>	<p>A procedure/format has been developed and tested for appeals and will be included in the HR Guideline.</p>	<p>No. Policy approval expected by December 2014.</p>

#	Recommendation	Management Response August 2012	Status as of March 31, 2014	Fully Implemented?
		<i>official Council approval.</i> <i>ESTIMATED TIMELINE: by 1/31/13</i>		