

**Office of Executive
Inspector General for
the Agencies of the
Illinois Governor**

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Office of Executive Inspector General for the Agencies of the Illinois Governor

HIRING & EMPLOYMENT MONITORING REPORT

First Quarter | 2025

UPDATES

The Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) provides this report each quarter on its hiring-related investigative and compliance work.

The interview portion of hiring sequences is critical, but it can also introduce the most discretion or bias to the process. During HEM's reviews, HEM examines the interview questions, preferred responses, and interviewer notes and scores, which helps shine a light on how candidates were evaluated and whether they were assessed fairly and consistently.

This quarter, HEM reviewed – and monitored in real time – the interview scoring for multiple sequences, finding in three instances that the interviewers were not discussing or documenting scores correctly. HEM reminds agencies to review with interviewers the scoring expectations, the need for justifications, and the importance of the interview record to ensure the integrity of a sequence. Interviewer guidance for State employees is available from the Illinois Department of Central Management Services (CMS) on OneNet, and from Agency Personnel Officers and their staff.



HEM Compliance Reviews

Between January 1 and March 31, 2025, HEM's work included the following.

Actions Taken During the First Quarter 2025	Count
Hiring-related reviews opened	25
Complaints referred to HEM	9
Hiring sequences monitored	2
Desk audits completed	13
Hiring reviews transferred to the OEIG Investigative Division	0
Hiring reviews administratively closed	4
Advisories issued	21

HEM Exempt List Reviews

The following chart represents the Exempt List reviews conducted this quarter.

HEM Exempt List Reviews	Count
Exempt appointment notifications/certifications received and reviewed for positions on the Exempt List	90 (No objections)
Exempt position description clarifications received	3 (No objections)
Exempt List addition requests received this quarter	18
Exempt List addition requests approved or not objected to this quarter	8
Exempt List addition requests not approved this quarter	4
Agency withdrawal of Exempt List requests this quarter	1
Exempt List deletion requests received this quarter	6
Exempt List deletion requests approved this quarter	0
Exempt List modification requests received this quarter	3
Exempt List modification requests approved this quarter	3
Exempt List pending requests	16

Exempt List Approvals by Agency – First Quarter 2025		
Agency/Entity	Working Title	OEIG Determination
Illinois Department of Corrections	Deputy Chief of Parole - Specialized Units	Approved Addition
Illinois Department of Corrections	Deputy Director of Project Development	Approved Addition
Illinois Department of Early Childhood	Chief Transition Design Officer	Approved Addition
Illinois Department of Early Childhood	Chief Data Officer	Approved Addition
Illinois Department of Healthcare and Family Services	Reproductive Health Chief	Approved Addition
Illinois Department of Human Rights	Deputy Chief Legal Counsel	Approved Addition
Illinois Department of Human Services	Deputy Chief Olmstead Officer	Approved Addition
Illinois Department of Human Services	Deputy Director of Systems Rebalancing - Colbert Administrator modified to Community Reintegration Programs Administrator	Approved Modification
Illinois Department of Human Services	Deputy Director of Systems Rebalancing - Williams Administrator modified to Consent Decree Diversion Administrator	Approved Modification
Illinois Department of Human Services	Disability Policy Administrator modified to Chief Olmstead Officer	Approved Modification
Illinois Gaming Board	Responsible Gaming Research and Project Manager	Approved Addition

HEM Exempt PSC Reviews

The following chart represents the exempt personal services contract (PSC) reviews conducted by HEM this quarter pursuant to paragraph 68 of the Comprehensive Employment Plan (CEP).

HEM Exempt PSC Reviews	Count
Exempt PSCs received for review	2
Exempt PSCs approved or not objected to this quarter	3
Exempt PSCs not approved this quarter	1

Approved Exempt PSCs by Agency – First Quarter 2025	
Agency/Entity	Position Title
Illinois Department of Human Services	Immigration Policy Advisor
Illinois Department of Veterans' Affairs	Special Advisor*
Office of the Illinois State Fire Marshal	Administrator of the Community Risk Reduction Program

**This PSC was time-limited to six months.*

Non-Exempt PSC Reporting

On March 26, 2025, the CMS Compliance Office provided the State's PSC Report for the fourth quarter of calendar year 2024. The following table summarizes this information:

Data from the State's PSC Report – 4 th Quarter 2024	Count
State entities that submitted a PSC report to CMS	52*
State entities that decreased their use of PSCs from the previous quarter	5
State entities that increased their number of PSCs	20
State entities that did not have a change in PSCs	27
State entities that reported not utilizing any PSCs	16

**The Illinois State Board of Investments did not report their PSC usage this quarter.*

Political Contact Reporting

This quarter, HEM received eight Political Contact reports, summarized below.

- The Ethics Officer at the Illinois Environmental Protection Agency (IEPA) reported that the Acting Chair of the Illinois Commerce Commission contacted IEPA to recommend an applicant for an Office Coordinator position. CMS Compliance agreed with IEPA's response to inform the agency that the position is under a collective bargaining agreement and will proceed through all policies regarding such positions, that only public information can be given, and that specific information about the candidates or position is not released. CMS Compliance reminded IEPA to disregard the recommendation for the candidate if they apply for this or any other position.
- Two reports were filed by the Illinois Department of Transportation (IDOT) Director of Legislative Affairs. In both cases, CMS Compliance reminded IDOT to continue to respond to these requests stating that only publicly available information can be shared and that any individual concerns need to be from the candidate and directed to the appropriate agency to which they applied.
 - One report stated that an Illinois State Representative contacted IDOT on behalf of a constituent who had applied to IDOT Highway Maintainer/Snowbird positions.
 - One report stated that a Legislative Staffer from another Illinois State Representative's office inquired about a current IDOT employee's job applications. IDOT informed the Staffer that their policy was not to discuss individual personnel issues and recommended that the employee contact IDOT's personnel office.
- Five reports were filed by two Illinois Department of Human Services (IDHS) Human Resources (HR) staff members.
 - Two reports identified two different applications for an IDHS Bureau Chief of Policy Development position that indicated the applicants worked for political figures, including three current U.S. Senators, a current U.S. Representative, and a former U.S. Representative. CMS Compliance stated that the information did not create a Political Contact.
 - Two reports identified two applicants who listed experience as legislative aids on their resumes for two different positions, an Assistant Superintendent and a Business Manager, respectively. CMS Compliance stated that this work experience did not create a Political Contact.
 - One report stated that a candidate for an IDHS Registered Nurse I position submitted three letters of recommendation, including from a U.S. Department of Justice Criminal Investigator, a medical doctor, and a Sheriff with the Jefferson County Sheriff's Office. CMS Compliance advised IDHS to disregard the letters of recommendation.

HEM Advisories

The following chart lists out the Advisories issued this quarter that resulted in HEM finding that the agency's selection for the position was merit-based and justifiable without any recommendations.

Advisories with No Recommendations – First Quarter 2025			
Advisory	Agency	Position Title	Type of Review
24-HEM-0079	IDNR	Civil Engineer III	Hiring Sequence Monitoring
24-HEM-0075	IDOI	Insurance Analyst	Desk Audit
24-HEM-0076	IDoA	Associate General Counsel	Hiring Sequence Monitoring
24-HEM-0007	IDOL	Compliance Officer	Desk Audit
24-HEM-0090	DMA	Military State DL Program Technical Administrator	Desk Audit
24-HEM-0088	IDNR	Chief Business Officer	Desk Audit
24-HEM-0074*	IEPA	Bureau of Land Permit Section Manager	Complaint Referral & Hiring Sequence Monitoring
25-HEM-0001	IDFPR	Professional Services Manager	Desk Audit
25-HEM-0002	IDHS	Human Resource and Labor Relations Administrator	Desk Audit
25-HEM-0007	IDOC	Business Administrator	Complaint Referral
24-HEM-0077	IDOI	Legal Counsel	Hiring Sequence Monitoring
24-HEM-0092*	ILCC	Licensing Assistant	Desk Audit
25-HEM-0014	IDES	Purchasing Specialist	Desk Audit
25-HEM-0004	ISP	Benefits Manager	Desk Audit
24-HEM-0057*	IDOT	Interviewing Unit Manager	Complaint Referral & Hiring Sequence Monitoring

**Summaries of these reviews or reminders are included below.*

HEM Advisory Summaries

Advisories that were noteworthy or included a HEM recommendation are summarized below. In some cases, HEM requested a formal response from the agency, which is also summarized.

24-HEM-0087

HEM conducted a desk audit review of the hiring file for an Accountant position at the Illinois Arts Council (IAC). While HEM found the selection decision to be merit-based and justifiable, HEM made a recommendation. In its review, HEM observed that an interviewer's notes were significantly less detailed than those recorded by the other two interviewers, and for most questions, the notes did not contain enough information to support the scores the interviewer awarded. Fortunately, the notes taken by the other two interviewers provided support for the candidates' overall interview scores. HEM also recalculated the candidates' overall interview scores without this interviewer's scores and found that this did not impact the rankings of the top three candidates. Thus, HEM did not take issue with the hiring decision. However, HEM recommended that if this individual is to serve as an interviewer again, IAC ensure that she understands that interviewer notes should include sufficient detail to support candidate scores and the ultimate selection decision. While HEM did not request a response to this Advisory, IAC responded that going forward, the agency HR Liaison will remind all interviewers before interviews begin of their responsibility to document all candidate responses accurately and completely and will provide interviewers with examples of interviewer notes with a sufficient amount of detail.

24-HEM-0074

The OEIG received a complaint regarding the hiring sequence for a Permit Section Manager within the Illinois Environmental Protection Agency (IEPA) Bureau of Land (BOL). The OEIG originally referred this complaint to IEPA, with response requested. In its response, IEPA stated that the agency had modified the qualifications for the position because two previous postings had resulted in only one minimally qualified candidate. HEM reviewed the previous two sequences (Sequences 1 and 2), both posted in 2022, as well as the sequence posted in 2024 (Sequence 3). HEM found that in Sequences 1 and 2, the position was classified as a Senior Public Service Administrator (SPSA), Option 8E,

requiring an Illinois Professional Engineer (P.E.) license. Sequence 1 was a failed sequence, as there was only one minimally qualified candidate and the candidate did not meet the minimum interview score. IEPA then posted Sequence 2, and again there was only one qualified candidate, but in contrast, this candidate exceeded the minimum interview score and was hired. In early 2024, the position became vacant again. In an effort to increase the candidate pool, IEPA changed the SPSA classification from Option 8E to Option 4 (Physical Sciences Environment) and modified the qualifications, including making the previously required P.E. license a preferred qualification. Despite these changes, Sequence 3 also resulted in a one-candidate interview sequence and this individual was hired.

At HEM's request, IEPA provided a list of all postings within the BOL since January 1, 2023. The list included eight SPSA-level position postings, five of which were classified as SPSA, Option 4. Of the three SPSA positions that were *not* posted as Option 4, two received one applicant total and the third was canceled without interviews because no one met the minimum application score. In contrast, the positions posted as Option 4 generally resulted in larger applicant and candidate pools, with at least three candidates interviewed in three sequences. HEM decided to monitor a current posting for an SPSA, Option 4 Field Operations Section Manager, with a focus on the size and competitiveness of the candidate pool, and found that all five interviewed candidates met the minimum interview score. Through this review, HEM learned that SPSA positions within the BOL can be difficult to fill, which has resulted in IEPA modifying the position classifications and/or qualifications and that posting these positions as Option 4 has typically resulted in larger, more competitive candidate pools. While this Advisory did not include any recommendations, HEM is including a summary in recognition and appreciation of IEPA's proactive efforts to fill these positions.

24-HEM-0080

In response to a complaint referral, HEM reviewed the hiring sequence for an Illinois Department of Veterans' Affairs (IDVA) Grants Administrator position, a merit compensation position. During this review, HEM found that the salary offers made to the candidates were inconsistent. HEM met with IDVA, CMS Compliance, and CMS Bureaus of Personnel and Transactions staff to understand why the fourth-ranked candidate received a higher salary offer than the third-ranked and also why IDVA agreed to the fourth-ranked candidate's

counter-offer, which was at a higher amount not offered to the first- or second-ranked candidates. Based on HEM's review, rather than reposting the sequence, HEM asked IDVA to extend the anticipated salary offer to the top-ranked candidate, and if declined, then to proceed to each candidate in order; IDVA agreed and did so. In the Advisory, HEM reminded the agency that salary offers must follow CMS salary guidance, including establishing, prior to posting or before candidates are selected, a realistic salary range that offers will fall within. HEM also reminded the agency that salary offers may decrease, but the offers cannot increase, as stated in the CMS Memorandum, "Updated Guidance on ASSR and Salary Treatment in MC Hiring Sequences," dated July 19, 2024.

HEM recognized that the majority of this sequence occurred before this salary guidance. In the future, HEM recommended that IDVA and CMS consider other ways to maintain the integrity of a sequence that does not include canceling and reposting, as was done here.

24-HEM-0092

HEM conducted a desk audit of a hiring sequence for a Licensing Assistant position at the Illinois Liquor Control Commission (ILCC). While the Advisory did not include formal recommendations, HEM reminded ILCC to schedule interviews at least 90 minutes apart to ensure adequate time for scoring.

24-HEM-0091

HEM conducted a desk audit of the hiring files for three HR Liaison positions at the Illinois Department of Public Health (IDPH). These positions were posted separately over the same dates in the spring of 2024. Many applicants applied to more than one of the postings and some were included in more than one interview pool. Because IDPH had planned to use the same interviewers and interview questions for all three positions, IDPH obtained approval from CMS Compliance to interview each invited applicant only once. In response to a similar issue raised in Advisory 24-HEM-0033, CMS issued updated guidance in November 2024 providing that when filling multiple vacancies for the same position, agencies should seek approval from CMS Compliance to combine the positions into a single requisition in SuccessFactors *prior to posting* (See CMS memorandum titled "Process to Combine Sequences," dated November 6, 2024). While HEM recognized that the IDPH sequences occurred before CMS issued its updated guidance, HEM reminded IDPH to follow CMS's current guidance in

combining sequences in the future. IDPH's HR Director confirmed the agency will do so.

24-HEM-0086

HEM conducted a desk audit of an Illinois Department of Commerce and Economic Opportunity (DCEO) Fiscal Liaison position. While HEM found the selection decision to be merit-based and justifiable, HEM made a recommendation regarding documenting scoring changes. In this sequence, after a selected candidate was identified, the CMS Hiring Lead alerted DCEO staff that they needed to submit corrected Interview Scoring Tools to account for several 10-point differences in scoring, as well as changes in scoring. Thereafter, a DCEO HR Liaison uploaded a second Interview Scoring Tool for one of the interviewers purporting to make the necessary corrections. However, HEM found that some of DCEO's changes suggested a misunderstanding of what is required. For example, the interviewer's initial notes for one of the candidates did not provide any justification for the interviewer's adjustment of their score or provide notes regarding the 10-point difference between this interviewer's and the other interviewer's score. In the updated Scoring Tool, it was noted, "Discussion held; keeping score the same." This issue was previously raised to DCEO in HEM Advisory 23-HEM-0013. HEM recommended again that DCEO ensure that interviewing staff understand when and how scoring differences and changes need to be discussed and documented. This will help to demonstrate that scoring changes were not made as a result of improper influence, thereby serving to justify the selection decision. HEM requested a response to this Advisory.

In response, DCEO acknowledged the need for interviewers to discuss any questions where the initial scores between interviewers vary by 10 points or more, and to document that a discussion was held and the reason for any changes to the candidate's score within the Scoring Tool. DCEO also stated they will meet with interview proctors regarding the importance of discussing these scoring differences and ensuring that all understand that documenting those discussions in the Interview Scoring Tool is an expectation. DCEO added that they will ensure the interviewers who participated in this sequence repeat the Interviewer Certification Training within 30 days to ensure they understand their responsibilities as interviewers.

24-HEM-0018

In response to several complaint referrals regarding concerns of unqualified hires into Stationary Engineer and Stationary Fireman titles, HEM reviewed hiring sequences for these titles at IDHS, CMS, and the Illinois Department of Corrections. These positions are generally responsible for operating the boiler and heating systems within State agency facilities, including ensuring that the equipment is safe and running properly. In the nine sequences it reviewed, HEM observed several consistent problem areas including the following:

- CMS Classification Specifications' use of terms that are vague and not clearly defined causes inconsistent assessments of minimum qualifications;
- the use of conjunctions in the Stationary Engineer position's minimum qualifications makes it unclear what experience is actually sought or required;
- the use of conjunctions could also result in a Stationary Fireman having more required experience than the supervising Stationary Engineer position; and
- the utilized CMS Standard Hiring Plans (SHPs) do not always ensure subject matter experts (SMEs) weigh in on the assessment of qualifications.

Based on HEM's review of the complaint referrals and related hiring sequences, HEM made several recommendations. First, HEM recommended further surveying of and discussions with the relevant stakeholders to better understand the facility-specific equipment and needs. Second, HEM recommended that the Classification Specifications, as well as related guidance, are clarified, including, by:

- defining relevant words and terms such as: power plant; operation; firing; high pressure; low pressure; and stationary boilers;
- removing the use of conjunctions in the minimum requirements and position descriptions, such as: "firing high pressure and/or low pressure stationary boilers;" and
- ensuring that appropriate experience is set forth in the minimum requirements for both positions.

Third, HEM recommended that agencies be required to update position descriptions consistent with the changes to the Classification Specifications, and

that training be conducted for Hiring Leads and SMEs regarding assessments of the minimum qualifications.

Fourth, HEM recommended that agencies should utilize SHP A, or another hiring plan that includes either a SME or agency screener review, or interview (if not both). Employing a hiring plan that includes review beyond CMS validation is a better practice for positions of this nature. Furthermore, it should be considered whether an unqualified candidate can be eliminated from consideration even if that is not determined until the interview stage.

Lastly, HEM recommended that agencies that use preferred qualifications should ensure that those are clearly stated and defined without overlapping with one another or with the minimum qualifications.

HEM requested a response from the relevant agencies that is due during the next reporting period.

24-HEM-0093

HEM conducted a desk audit of the hiring sequence for an Education Director at the Abraham Lincoln Presidential Library and Museum (ALPLM). While HEM found that the selection decision was merit-based and justifiable, it made two recommendations to CMS and ALPLM, respectively, regarding applicant screening. First, after confirming with CMS that two applicants who were deemed qualified by the CMS Hiring Lead did not meet one of the position's minimum qualifications, HEM recommended CMS ensure Hiring Leads are accurately interpreting and applying the complete minimum qualifications in validating applicants against a position's requirements. HEM also found that the ALPLM Subject Matter Expert (SME) inconsistently assessed applicants against one of the position's preferred qualifications, PQ 1, pertaining to licensure. This was likely the result of, or at least exacerbated by, the incompatibility of a follow-up application question with the qualification it was meant to assess. It also appeared the SME evaluated PQ 1 based solely on the applicants' responses to the follow-up question, although there was a separate section of the application for "Certifications/Licenses" and applicants were also advised to upload copies of any certifications or licenses to the "Additional Documents" section. In future hiring sequences for this position, HEM recommended ALPLM either revise the follow-up question for PQ 1 to more appropriately assess whether applicants meet the preferred qualification or eliminate the follow-up question and instruct applicants to include their licensure information in the "Certifications/Licenses" section and upload it to the "Additional Documents" section. HEM further

recommended ALPLM instruct the assigned SME to also review these other sections of the application in determining whether applicants possess the preferred licensure, and that the agency should consider additional training for this particular SME if he is to serve in this role again. HEM requested that CMS and ALPLM provide responses to these recommendations, which are due after the end of this reporting period.

24-HEM-0057

In response to a complaint referral alleging that an interviewer encouraged some employees to apply for an Interviewing Unit Manager at IDOT but discouraged others from applying, HEM reviewed the hiring sequence. On HEM's recommendation, IDOT decided to cancel and repost the sequence without the potentially conflicted interviewer participating, and HEM monitored the repost. While HEM found the selection decision to be merit-based and did not make any formal recommendations, HEM reminded IDOT that interviewers need to accurately document initial scores, in compliance with the Comprehensive Employment Plan (CEP). In this sequence, HEM found that one of the interviewers changed her initial score to her adjusted score two times for two different candidates. Fortunately, the interviewer stated her initial score verbally, which the HEM monitor recorded, and the interviewer appropriately included the justification for the changes. After HEM raised this issue, the interviewer stated it was an oversight and verified her initial scores in an email, which IDOT uploaded to the requisition.

Investigative Division

The OEIG's Investigative Division typically receives over 3,000 complaints every fiscal year from members of the public, State employees, contractors, bidders, and anonymous sources. The OEIG evaluates all new complaints to determine the appropriate action, including opening an investigation, referring the allegations to the appropriate entity, or making a referral to HEM. In addition, the OEIG also has the authority to self-initiate an investigation based on information discovered in other investigations or available via public sources.

Hiring-Related Complaints

For the first quarter of 2025, the OEIG received 46 hiring-related complaints. The following chart reflects the actions that were also taken with regard to hiring-related complaints during this quarter.



Hiring-Related Investigations

The following are the Investigative Division's numbers at the close of this quarter.

Hiring-Related Investigations	Count
Hiring-related investigations pending at the close of the quarter	16*
Hiring-related investigations closed this quarter	4
Founded reports related to hiring issued this quarter	0
Founded reports related to hiring made available to the public this quarter	0

**One pending hiring-related investigation was not reported last quarter.*

This quarter, the Executive Ethics Commission (EEC) did not make any OEIG founded reports related to hiring available to the public. Previous publicly released reports are available at <https://oeig.illinois.gov>.

HIRING-RELATED REFERENCES

OEIG Hiring & Employment Monitoring Quarterly/Annual Reports

<https://oeig.illinois.gov/hem/hem-reports.html>

The Governor's Comprehensive Employment Plan for Agencies Under the Jurisdiction of the Governor (CEP)

<https://cms.illinois.gov/content/dam/soi/en/web/cms/personnel/employeeresources/documents/comprehensive-employment-plan.pdf>

CMS Exempt List

<https://cms.illinois.gov/content/dam/soi/en/web/cms/documents/exemptlist-w-incumbents.pdf>

CMS Political Contact Reporting (For State Employees)

<https://ilgov.sharepoint.com/sites/CMSPoliticalContactReporting>

Personnel Code

<https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=236&ChapterID=5>

OneNet Trainings

<https://onenettraining.illinois.gov/onenettraining/page.aspx>

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