

Hiring & Employment Monitoring Report

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

**Fourth Quarter
&
Annual Report
2024**



Table of Contents

I. Overview	1
Office of Executive Inspector General for the Agencies of the Illinois Governor	1
Investigative Division	2
Hiring & Employment Monitoring Division	3
II. Developments & Updates	5
HEM Reaches Record Levels.....	5
Increased Collaboration between HEM and Agency Staff	6
Examples of Positive Agency Action Taken in Response to HEM Advisories	7
III. HEM's Compliance Reviews.....	10
Hiring Sequence Monitoring.....	11
Desk Audits	12
Complaint Referrals.....	13
Other HEM Reviews and Actions	14
IV. HEM Advisories	16
HEM Advisory Summaries	17
HEM Advisory Updates	26

V. HEM Exempt Reviews	27
Exempt List	27
Exempt Personal Services Contracts	31
VI. Non-Exempt PSC Reporting.....	32
VII. Political Contact Reporting	35
VIII. Investigative Division.....	37
Hiring-Related Complaints.....	38
Hiring-Related Investigations	39
IX. Appendices	40
OEIG Leadership.....	40
Percentage of Exempt Positions by Agency - Fourth Quarter 2024	42
Hiring-Related References.....	44



Message from Inspector General Susan Haling

I am pleased to present the 2024 Annual Hiring & Employment Monitoring (HEM) Report which showcases the Office of Executive Inspector General's (OEIG) compliance and investigative work on State hiring and employment between January 1, 2024 and December 31, 2024. The report also includes a breakdown of hiring-related work conducted during the fourth quarter of 2024.

This year, HEM substantially increased its work output in several areas, providing an even broader and deeper understanding of hiring in the State. This work, described in more detail in the report, resulted in the following achievements:

- the issuance of 86 Advisories to 38 different agencies, reflecting a continued upwards trend and a 30% increase from the previous year's 66 Advisories to 30 agencies;
- the completion of 59 desk audits of hiring sequences, a 31% rise from 45 desk audits the previous year; and
- the handling of 43 new complaint referrals, the highest number referred to HEM to-date, up from 29 the previous year.

Related to this, HEM also saw an increase in the number of Advisories that pertained to complaint referrals, approximately a quarter of those issued. Additionally, of the 86 total Advisories issued this year, HEM made recommendations in only 30 of these, or 35%, showing a 7% decrease from last year, and a continued commitment to compliance by the State.

This year, HEM also collaborated with agencies and the Governor's Office to ensure recommendations are implemented. Through these collaborations, HEM addressed hiring issues such as posting for multiple vacancies, interviewer training, and applicant screening. This resulted in hiring-related improvements, such as at the Illinois Department of Children and Family Services (DCFS). HEM also worked with the Illinois Department of Corrections (IDOC) and the Governor's Office on establishing a formal competitive selection process for assignments to the IDOC Intelligence and Investigations Division. These collaborations are described in the Developments and Updates section of this report.

In addition to this work, HEM also reviewed 300 exempt appointment notifications and 82 Exempt List modification requests. The OEIG Investigative Division closed 14 investigations related to hiring this year, an increase from last year. One hiring-related founded report was made available to the public.

As our work product increases, HEM and the OEIG Investigative staff remain committed to ensuring competitive State hiring free from improper influence through its in-depth reviews and feedback that require a significant understanding of State hiring policies and needs. As the hiring issues continue to change and evolve, so too do our approaches, outreach, and recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Susan M. Haling".

Susan M. Haling
Executive Inspector General

I. Overview

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

The State Officials and Employees Ethics Act (Ethics Act), 5 ILCS 430/1, et seq., established the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) in 2003. The OEIG is an independent executive branch State agency. The Ethics Act authorizes the OEIG to investigate allegations of fraud, waste, abuse, mismanagement, misconduct, nonfeasance, misfeasance, malfeasance, and violations of the Ethics Act (such as prohibited political activity, sexual harassment, the gift ban, and retaliation) and other related laws and rules. The OEIG also investigates allegations of hiring improprieties and conducts compliance-based reviews of employment procedures and decisions. In addition, the OEIG plays a vital role in reviewing Ethics Act-mandated trainings and conducting revolving door determinations.

The OEIG has jurisdiction over:

- more than **170,000** State employees, appointees, and officials, including the Governor and the Lieutenant Governor;
- more than **300** executive branch State agencies, departments, boards, and commissions;
- the **nine** State public universities across a dozen campuses;
- the **four** Chicago area Regional Transit Boards (the Regional Transportation Authority, the Chicago Transit Authority, Metra, and Pace); and
- vendors and contractors of any of those entities.

Executive Team

Susan M. Haling,
Executive Inspector
General

Neil P. Olson,
General Counsel

Fallon Opperman,
Deputy Inspector
General and
Chief of Chicago
Investigative Division

Erin K. Bonales,
Director of Hiring
& Employment
Monitoring Division

Christine Benavente,
Deputy Inspector
General - Executive
Projects

Angela Luning,
Deputy Inspector
General and Acting
Chief of Springfield
Investigative Division

Ogo Akpan,
Chief Fiscal Officer
and Operations
Manager

Investigative Division

The OEIG receives complaints from many different sources, including members of the public, State employees, law enforcement officials, contractors, and individuals requesting to remain anonymous. In the absence of consent from a complainant, the OEIG is required to ensure that the identities of complainants are and will remain confidential unless otherwise required by law.

The OEIG evaluates all new complaints to determine the appropriate action. To conduct investigations, OEIG investigators interview witnesses, collect documents, analyze records, conduct surveillance, perform computer forensics, and use a variety of other investigatory tools and techniques. The OEIG also has subpoena power to obtain information relevant to an investigation. Investigations are governed by the OEIG's Investigation Policy and Procedures Manual, the Illinois Administrative Code, and other applicable laws, rules, policies, and regulations, which can be viewed on the OEIG's website.

In Fiscal Year 2024 (FY2024), the OEIG processed 3,035 complaints, opened 214 investigations, referred 2,727 complaints and/or investigations to other agencies or appropriate entities, and administratively closed 186 complaints. The OEIG completed 288 investigations, including 186 with findings of wrongdoing. Also, in FY2024, 28 founded reports were made public by the Executive Ethics Commission (EEC). Those reports can be found on the OEIG website here: [Founded OEIG Investigative Reports](#).

Anyone seeking to report wrongdoing to the OEIG may:

- file a complaint online at oeig.illinois.gov;
- call the OEIG at 866-814-1113;
- TTY at 888-261-2734; or
- mail a printed copy of a complaint form to the OEIG Springfield or Chicago offices.

The OEIG has complaint forms available in both English and Spanish.

You may report alleged violations to the OEIG anonymously. When filing a complaint, please ensure that there is sufficient detail concerning the allegations for an investigation to be initiated.

Hiring & Employment Monitoring Division

The Ethics Act directs the OEIG to “review hiring and employment files of each State agency within [its] jurisdiction to ensure compliance with *Rutan v. Republican Party of Illinois* ... and with all applicable employment laws.” 5 ILCS 430/20-20(9). In keeping with this mandate, the OEIG created the Hiring & Employment Monitoring (HEM) Division, which conducts compliance-based reviews of State hiring and employment procedures and decisions and provides recommendations in order to help improve the efficiency and quality of State hiring. HEM monitors hiring sequences (which includes in-person or virtual real-time monitoring of interviews), conducts desk audits, reviews complaint referrals, and monitors political contacts.

In addition, HEM reviews all requests to add or delete positions from the State’s Exempt List. The Exempt List is a comprehensive list of exempt positions for which hiring and employment decisions may be made on the basis of political or other non-merit factors. In addition to approving changes to the Exempt List, HEM staff also reviews all appointments made into these at-will positions to ensure that the selected candidates are minimally qualified for their positions.

HEM also ensures compliance with the State’s Comprehensive Employment Plan (CEP), which sets forth general principles applicable to all hiring and implements hiring processes for both exempt and non-exempt positions.

HEM reports on its work by issuing quarterly and annual reports as well as Advisories which summarize HEM's review and make recommendations. In Calendar Year (CY) 2024, HEM issued 86 Advisories, involving 38 different agencies. From January 1, 2024 to December 31, 2024, HEM staff monitored 14 hiring sequences and completed 60 desk audits. HEM staff also reviewed 300 exempt appointment notifications and received 82 Exempt List modification requests. The OEIG's Quarterly and Annual HEM Reports can be found on the OEIG's website here: [HEM Quarterly and Annual Reports](#).

HEM Team

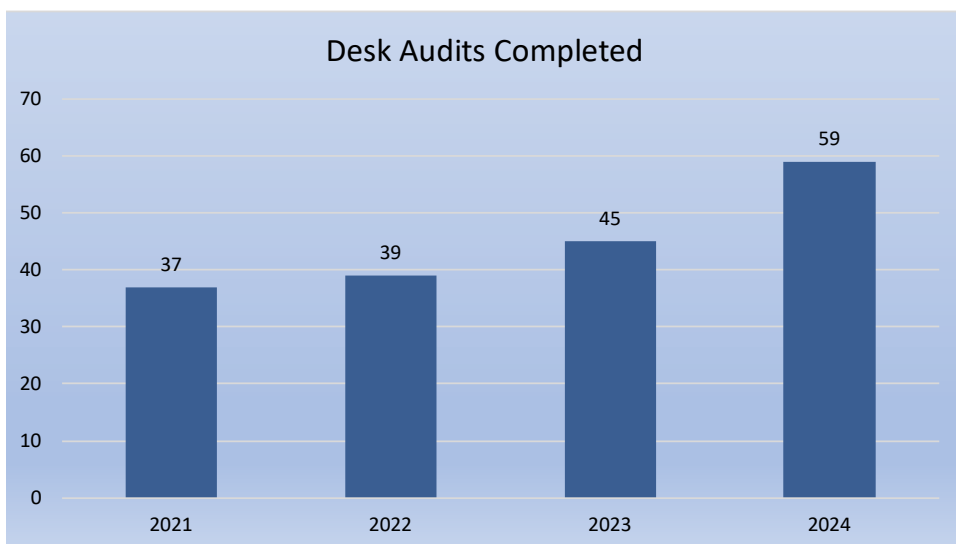
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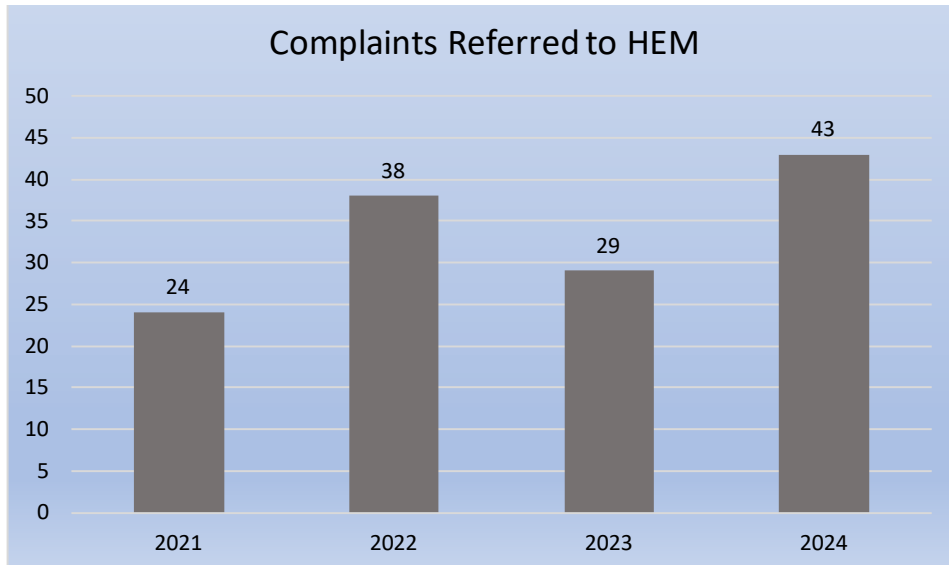
II. Developments & Updates

HEM Reaches Record Levels

In 2024, HEM's work output reached record-high levels in several categories:

	2021	2022	2023	2024
<i>Advisories Issued</i>	61	52	66	86
<i>Desk Audits Completed</i>	37	39	45	59
<i>Complaints Referred to HEM</i>	24	38	29	43





As reflected in the graphs above, the OEIG received the highest number of hiring-related complaints in the last five years, nearly a third of which were referred to HEM, representing an increase of 9% from last year. Twenty-two of the 86 Advisories issued – over a quarter – pertained to complaint referrals; 17 of the 22 – over three-quarters – included recommendations that were implemented.

Increased Collaboration between HEM and Agency Staff

During this reporting period, HEM also worked with agency and Governor's Office staff in follow-up to an extensive OEIG investigation and founded report.

22-HEM-0060 - HEM Follow-up to OEIG Case No. 20-00408

HEM issued an Advisory regarding its work with IDOC and the Governor's Office on a collaborative effort to establish a formal competitive selection process for selecting staff for indefinite, full-time assignments to the IDOC Intelligence and Investigations Division (IID). This work was initiated in response to the OEIG's founded report in case no. 20-00408. See [20-00408 Sims and IDOC Released Redacted Summary Report](#). HEM requested and reviewed lists of employees assigned to IID; IID selection packets from 2021, 2022, 2023, and 2024; draft post descriptions for each IID assignment; and a modified draft Administrative Directive (A.D.) 01.12.115 for Institutional Investigations and Intelligence Assignments. HEM participated in regular meetings with the Governor's Office and IDOC, primarily to develop a hiring plan for IID assignments that would

provide a hiring process with sufficient structure to ensure competitive hires while meeting IDOC's operational needs. Ultimately, based on the commitment and effort of these three entities, the A.D. was finalized on August 29, 2024, and implemented effective September 1, 2024.

The new process set forth in A.D. 01.12.115 provides that all IID vacancies must be posted at the assigned facility for at least five days; interested employees apply by submitting a letter of intent and resume; a standardized applicant screening process is used to identify the pool of eligible candidates; all employees involved in candidate selection complete Relationship Disclosure and Conflict of Interest Certifications (Disclosure Forms); IID staff conduct standardized candidate interviews; the interviewers document and explain the selection decision in a written summary report; the facility Warden, Deputy Director of Human Resources, and Investigations Chief all must approve the selection decision; and all hiring sequence documentation must be maintained within the hiring file. A.D. 01.12.115 also includes procedures for ensuring employees assigned to IID are accurately evaluated on the performance of the duties of the specific IID assignment, and a process for removing an underperforming employee from an IID assignment. HEM also worked with IDOC and the Governor's Office to modify post descriptions for each type of IID assignment delineating the specific duties, responsibilities, and supervisory reporting structure for the assignment.

In late October 2024, IDOC provided HEM with selection documentation for four recent IID assignments at different IDOC correctional centers. Three of these sequences were completed in August 2024 – shortly before the modified A.D. went into effect. While these three sequences did not technically follow all of the steps of the modified A.D., the documentation supported that these were structured, competitive sequences. HEM found the fourth sequence, conducted shortly after the modified A.D. was finalized, to be fully compliant. While HEM recognizes the unique nature of these assignments, it remains imperative that these positions be filled by a standardized process that reflects merit-based, competitive selection principles. HEM appreciates IDOC's and the Governor's Office's commitment, work, and collaboration necessary to accomplish this.

Examples of Positive Agency Action Taken in Response to HEM Advisories

In multiple instances this year, CMS, and/or the hiring agency, issued formal guidance or made positive changes in its hiring processes directly in response to HEM's Advisories. Specific examples are discussed below.

A summary of all Advisories issued this quarter are further described in the Advisory Summaries section of this report. Summaries of Advisories issued in previous quarters are included in HEM's previous quarterly reports, available on the OEIG's website here, [HEM Quarterly/Annual Reports](#).

DCFS Sequences – 24-HEM-0008, 23-HEM-0070, and 22-HEM-0002

This year, HEM audited and monitored multiple DCFS hiring sequences across DCFS divisions stemming from complaint referrals, desk audits, and interview monitoring; and issued three advisories. In the first quarter of 2024, HEM issued 24-HEM-0008 and 23-HEM-0070 and, in the third quarter, HEM issued 22-HEM-0002. As result of these advisories, HEM collaborated with DCFS to implement and modify several of its hiring related policies and procedures.

- In 24-HEM-0008, HEM addressed instances of DCFS's non-responsiveness to requests from HEM and/or CMS Compliance, as well as DCFS proceeding on hiring sequences without CMS Compliance approval. In response to 24-HEM-0008, DCFS modified its vacancy tracking form to identify whether HEM has asked about a particular hiring sequence to signal to staff that HEM should be notified of any developments with the sequence. CMS Compliance also implemented changes to its online query process so that matters are appropriately flagged and addressed by both HEM and CMS.
- In 23-HEM-0070, HEM made recommendations regarding the completion and vetting of Disclosure Forms after identifying untimely and insufficiently vetted Disclosure Forms. In response to 23-HEM-0070, DCFS is now requiring the submission of Disclosure Forms by interviewers no less than seven days prior to interviews. If the forms are not submitted at least three days prior, the interviews will be rescheduled. If conflicts are identified, the DCFS Transactions Manager will provide final approval. Additionally, CMS plans to conduct an additional training for all staff who are involved in assessing conflicts of interest. DCFS also shared that one HR Representative will no longer participate on interview panels; was placed on a Corrective Action Plan; and will not vet Disclosure Forms until DCFS determines this duty can be resumed. In response to this advisory, as well as 24-HEM-0008, DCFS also designated a DCFS liaison to work with HEM on matters under review.
- In 22-HEM-0002, HEM raised concerns regarding the integrity of DCFS's Licensing Division's interview materials and the overutilization of interview materials. In response to 22-HEM-0002, DCFS stated that it would maintain a bank of interview questions for DCFS's frequently posted positions. From that bank of interview questions and ideal answers, DCFS will develop new interview materials for each

sequence. Additionally, before a new requisition is posted a DCFS Transactions Liaison will need to contact DCFS Classifications to obtain updated interview materials; DCFS Transactions staff will be directed not to save interview tools to their personal hard drives; and all interview tools will be stored on a shared drive that is only available to members of the DCFS Classifications team. The DCFS Office of Employee Services (OES) will also amend the invitation to interview email to ask candidates that are also current DCFS employees to identify their involvement in the last 12 months as a subject matter expert or any other function that would require the completion of a Disclosure Form via email prior to the start of interviews. Lastly, DCFS assigned another OES staff member to liaise with HEM on DCFS Licensing sequences, and other sequences HEM is monitoring.

CMS: 24-HEM-0033

In response to this Advisory to IDOC, CMS issued a memo to all agencies instructing that going forward, if an agency wishes to combine multiple vacancies for the same position into a single interview sequence, the agency must post the vacancies under the same requisition in SuccessFactors.

Illinois Property Tax Appeal Board: 24-HEM-0063

As a result of this Advisory to the Illinois Property Tax Appeal Board (PTAB), CMS updated its forthcoming 2025 Interviewer Training to include an instruction that interviewers should not consider non-verbal factors, such as a candidate's attire or virtual interview setting, in scoring the candidate's responses to the interview questions, and should instead document any pertinent observations elsewhere in the scoring tool.

IDOC: 20-HEM-0106 and 22-HEM-0049

This combined Advisory discussed HEM's yearslong collaborative work with IDOC and CMS to ensure consistency with regard to the minimum qualifications and interpretation of the same for the IDOC Shift Supervisor title. In response to HEM's recommendations, CMS promptly submitted the classification revision to the Civil Service Commission, which approved it, and explained that the approval of the new classification negated any legacy grades issued under the previous classification. CMS also instructed IDOC to add language to all new Shift Supervisor postings informing applicants that legacy grades and validation determinations completed prior to the classification revision date are no longer valid.

III. HEM's Compliance Reviews

To ensure State hiring complies with governing policy and law, HEM uses multiple strategies and resources to evaluate and make recommendations on the State's hiring practices and processes. To review hiring, HEM monitors hiring sequences in real-time, conducts desk audits of hiring files utilizing the State's electronic hiring system, and accesses the State's human resources or personnel information systems. HEM also works closely with agency personnel staff, CMS Hiring Reform Team members, and CMS Compliance to review systemic issues that involve a particular hiring-related process, position, unit, or agency. While some HEM compliance reviews are selected randomly, such as many desk audits, other reviews are based on complaint referrals or on recurring issues or issues that need further review. HEM also uses its previous reviews to determine which agencies and issues may need attention.

Hiring Sequence Monitoring

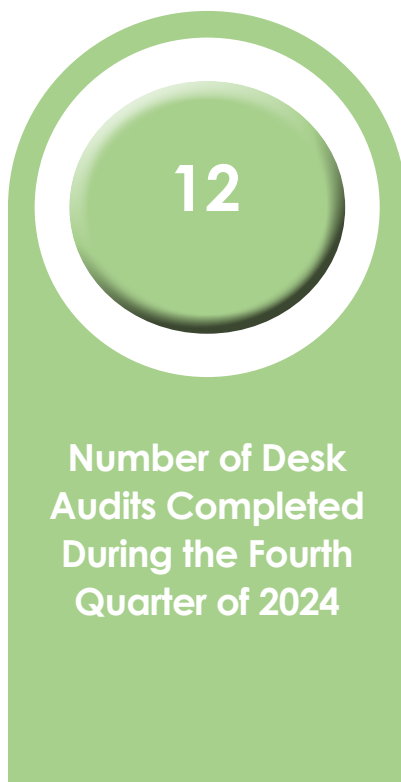
One of the ways HEM assesses agency compliance with the CEP and other governing authority is by monitoring hiring sequences at State agencies in real-time. HEM selects sequences to monitor in various ways; some are selected based on HEM's review of agency postings in SuccessFactors, the State's electronic hiring system, or communication with CMS Compliance or agency human resources personnel. When HEM monitors a hiring sequence, in addition to observing all interviews, HEM is involved with the agency from the beginning to the end of the hiring sequence, starting with reviewing the work that occurs before the agency posts the position, which includes updating the position description and drafting application questions, screening criteria, interview questions and ideal answers, and concluding with the hire of the successful candidate.



* This number reflects the subtraction of one hiring sequence reported as monitored in the First Quarter 2024 HEM Report that should not have been included.

Desk Audits

In addition to monitoring interviews, HEM completes desk audits of agency hiring sequences. When HEM conducts a desk audit of a hiring sequence, HEM reviews all documentation related to the sequence, as it would for a monitored sequence, but does not observe the actual interviews, instead thoroughly reviewing the interview paperwork to ensure the selection decision was merit-based and justifiable. This review can take place as the hire is proceeding or after a sequence has concluded. HEM generally selects these sequences by reviewing SuccessFactors or in response to a complaint referral.



Complaint Referrals

Upon receipt of a complaint, the OEIG's Investigative Division performs an initial review of the allegations, which must be completed within 30 days. After this initial review, the OEIG has the discretion to open an investigation, refer to HEM for a hiring compliance review, and/ or refer to other entities, as it deems appropriate. A complaint is often referred to HEM if it involves allegations of a violation of the CEP or a breach of a hiring-related procedure or policy. HEM's compliance function and knowledge of State hiring procedures allow HEM to efficiently evaluate whether a hiring sequence was conducted appropriately. If a violation is discovered that may have impacted the outcome of a hiring sequence, HEM can often intervene before, during, or shortly after the violation occurred, to remedy the issue.



Other HEM Reviews and Actions

HEM's reviews are not limited to evaluating hiring files and frequently require follow-up with the agency personnel staff or CMS. HEM may analyze issues ranging from administration of the hiring process to issues with how individual applicants are evaluated by interviewers. The results of HEM's reviews are described in written advisories issued to the agency and the Governor's Office.

During the course of a review, if HEM identifies issues of possible hiring-related wrongdoing that reveal misconduct or may involve political manipulation, as opposed to hiring errors, HEM may transfer the matter to the OEIG Investigative Division for a more in-depth investigation involving OEIG interviews.



Summary of HEM Compliance Actions Taken

Fourth Quarter 2024	Count
Hiring-related reviews opened	22
Hiring sequences monitored	5
Desk audits completed	12
Complaints referred intra-Office to HEM	7
Hiring reviews transferred to the OEIG Investigative Division	1
Hiring reviews administratively closed	4
Advisories issued	19

Calendar Year 2024	Count
Hiring-related reviews opened	94
Hiring sequences monitored	14
Desk audits completed	60
Complaints referred intra-Office to HEM	43*
Hiring reviews transferred to the OEIG Investigative Division	1
Hiring reviews administratively closed	19
Advisories issued	86

* This number has been updated to reflect three additional complaint referrals that HEM received in the first quarter that were not reflected in the First Quarter 2024 HEM Report.

IV. HEM Advisories

At the conclusion of a HEM review, HEM issues a written Advisory that is transmitted to the chief Agency Personnel Officer and the Illinois Department of Central Management Services (CMS) Chief Compliance Officer, with copies to the Governor's Office and the head of the Agency. The Advisory includes:

- a summary detailing the subject and scope of the review;
- a description of HEM's conclusions regarding compliance with applicable rules and procedures; and
- recommendations on how to proceed, if necessary.

Advisories Issued in 2024					
	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Total
Total Advisories Issued	20	23	24	19	86
Advisories with No Recommendations	14	14	20	8	56

Some Advisories result in HEM finding that the agency's selection for the position was merit-based and justifiable without any recommendations.

Advisories with No Recommendations – Fourth Quarter 2024			
Advisory	Agency	Position Title	Type of Review
24-HEM-0058	Lottery	Sales Representative	Desk Audit
24-HEM-0060	IDOT	Roadside Management Specialist	Desk Audit
24-HEM-0065	CEI	Mentor Protégé Program Manager	Desk Audit
24-HEM-0067	HFS	Eligibility Integrity Section Manager	Desk Audit
24-HEM-0084	IDOC	Assistant Labor Relations Manager	Desk Audit
24-HEM-0073	GAC	Staff Attorney	Desk Audit
24-HEM-0068	PRB	Office Assistant	Desk Audit
24-HEM-0071	IDJJ	Corrections Food Service Supervisor I	Desk Audit

HEM Advisory Summaries

Advisories issued in the Fourth Quarter that included a HEM recommendation are summarized below. In some cases, HEM requested a formal response from the agency, which is also summarized. Summaries of the Advisories that made recommendations in the first three quarters of the year are available in the previously issued quarterly reports available on the [OEIG website](#).

24-HEM-0055

HEM conducted a desk audit of an Interpreter Coordinator at the Illinois Deaf and Hard of Hearing Commission (IDHHC). While HEM found that the selection decision was merit-based and justifiable, HEM noted that one of the interview panel members adjusted some of his original scores for each of the candidates without providing a reason for any of the scoring changes. HEM recommended IDHHC ensure employees who serve as interviewers understand they need to include an explanation for any scoring change in the “Justification for Score Change” column of the scoresheet. While HEM did not request a response to this Advisory, IDHHC responded, accepting HEM’s recommendation, and stating it would ensure staff review this requirement prior to conducting interviews.

24-HEM-0019

In response to a complaint referral, HEM monitored the interviews for a Bureau Chief position within the Illinois Department of Human Services (IDHS) Office of Inspector General (OIG). HEM found the selection decision to be merit-based and justifiable, but recommended IDHS modify its internal Division Position Expert (“DPE”) Confidentiality Form to include language stating an employee will not apply to the same hiring sequence for which he or she has been assigned to serve as the DPE. IDHS responded to this Advisory confirming they had implemented this recommendation and providing a copy of the modified form.

23-HEM-0043

In response to three related complaint referrals that alleged inappropriate or problematic hiring and employment activities at the Illinois Department of Veterans’ Affairs (IDVA), HEM reviewed 1) the minimum qualifications for the Chief Financial Officer (CFO); 2) IDVA’s performance evaluation processes; 3) whether family members were being hired at the Manteno Veterans’ Home; and 4) temporary assignments and appointments.

1. HEM reviewed the minimum qualifications for the IDVA CFO position and compared it with three other agency CFO position descriptions. Two of the latter required a master's degree, but none required licensure as a Certified Public Accountant (CPA). HEM suggested that as a best practice IDVA consider adding, at minimum, preferred qualifications to the position description, to include heightened education and relevant certifications, such as a master's degree and CPA.
2. As a sample, HEM requested and reviewed a spreadsheet reflecting the performance evaluations for the Manteno Veterans' Home that were to be completed between January 1, 2023 to September 1, 2023. Of the 222 employees, 21 evaluations were at least two to seven months past the listed due date. HEM periodically followed up on the status of these evaluations and found that after ten months, 11 employees still had not received the evaluation. HEM recommended that IDVA review its performance evaluation process and consider ways to ensure timeliness. HEM suggested that the agency consider completing all evaluations once or twice a year, so that due dates are less likely to be missed. HEM also requested an update from IDVA on the status of its evaluations at Manteno.
3. HEM confirmed that Employee A, the Manteno Home Administrator, is the sister of Employee B, the Manteno Assistant Director of Nursing, and the aunt of Employee C, who is the daughter of Employee B and was most recently hired as a Licensed Practical Nurse II in June 2024. HEM noted IDVA's Nepotism Policy stated that written approval from the IDVA Director was needed to employ a relative in the same section of IDVA where the potential exists to supervise a relative or have some effect on the relative's performance evaluation or pay. HEM requested the written approval for the exception to the policy for the hiring of Employee A to oversee the Manteno Home, and the written approval for the exception to the Nepotism policy for the Hiring of Employee C where she will report to a supervisor who is supervised by her mother. HEM also noted that if IDVA planned for these employees to remain in their positions, then IDVA needed to ensure there is guidance provided to staff, including HR staff, the subject employees, and their supervisors, regarding how performance evaluations, work assignments, salary decisions, and other determinations will be made where conflict of interest, ethical concerns, and the perception of favoritism and unfairness may arise. HEM also requested to review the guidance – whether previously or newly created – including the appropriate limitations that have been provided, and to which employees.

4. HEM confirmed that a Manteno HR Associate was working overtime as a Nursing Assistant. However, HEM also confirmed that the HR Associate maintained an active certified nursing assistant (CNA) registration as required by the Nursing Assistant position and that the HR Associate rate was the employee's overtime rate as required by the union agreement.

HEM also requested information on three retirees that were currently employed at the Quincy Veterans' Home via 75-day temporary appointments. During this review, IDVA confirmed that all three employees were no longer on these appointments, and IDVA had filled or was working to fill the vacancies.

HEM also requested a current list of temporary assignments for the Manteno and Quincy Veterans' Homes. HEM later followed up for an updated report. HEM reminded IDVA to post as soon as a vacancy exists, and continue to post if not filled, so that temporary assignments or appointments do not continue longer than necessary, and IDVA is not finding itself understaffed and having to fill multiple vacancies.

IDVA Response

In response, IDVA stated that it will incorporate a higher level of qualification, including a master's degree or CPA license, in the CFO position description. IDVA also shared that it has created an updated evaluation tracker that will be uniformly implemented across all IDVA locations to ensure consistency and eliminate the risk of errors or oversights in the evaluation process. IDVA stated it will actively monitor the use of the tracker to ensure timely completion. Regarding Manteno's evaluation timeliness, IDVA stated it has identified outstanding evaluations and is targeting a completion date of November 15, 2024 for these.

In response to the requests and recommendations regarding the nepotism, IDVA responded that it was unable to identify formal approval for the existing reporting arrangement. IDVA stated that moving forward, it will ensure that all policies related to supervision and reporting structures are upheld in strict accordance with IDVA's guidelines and procedures. To address HEM's concerns, IDVA stated that it has made the following changes in the chain of command:

- Employees A, B, and C will continue to report to their immediate supervisors, ensuring there is no direct supervisory relationship that could create conflicts of interest or perceptions of favoritism.
- HR staff, the subject employees, and their supervisors will receive formal

guidance on how performance evaluations, work assignments, salary decisions, and other related matters will be handled to maintain objectivity and fairness. Alternative reporting structures have also been developed for Employees A, B, and C, which were shared with HEM.

- HR is considering adding as a non-scored, non-eliminating question to all future requisitions the question, "Do you have relatives employed by IDVA?"

24-HEM-0045

HEM monitored the hiring sequence for a Deputy Program Manager at the Illinois Criminal Justice Information Authority (ICJIA). While HEM found the selection decision to be merit-based and justifiable, HEM observed a few scoring issues during the monitoring. For example, Interviewer A, who was serving as the proctor, stated that she was not entering initial scores on the spreadsheets. Interviewer B also did not input scores in the correct initial and adjusted score columns and did not note a justification for one of the score changes. For many of the score adjustment justifications, Interviewer B used the same language. HEM reminded the agency that interviewers need to accurately document their initial scores and any changes to these scores, in compliance with the Comprehensive Employment Plan (CEP). To ensure compliance, HEM recommended having an HR staff person participate in the interviews themselves as a non-scoring proctor. HEM also recommended that ICJIA follow-up directly with Interviewers A and B to ensure their understanding of the importance of proper documentation to establishing and maintaining the integrity of a hiring sequence.

24-HEM-0033

In response to a complaint referral, HEM reviewed the hiring sequence for three Corrections Treatment Senior Security Supervisor (CTSSS) vacancies at an Illinois Department of Corrections (IDOC) facility. The three vacancies were posted separately (Sequences 1, 2, and 3) and combined into one interview sequence with CMS's approval. HEM found that the manner in which CMS and IDOC combined these vacancies – which involved combining the interview pools only and otherwise treating Sequences 1, 2, and 3 as separate sequences – created a paper trail that was confusing and increased the chances that hiring sequence errors would be made, as occurred in this sequence with regard to one candidate.

In addition, because CMS did not combine or compare the applicant pools from Sequences 1, 2, and 3 in determining the final interview pool, one applicant was not invited to interview although this individual had a higher application score than applicants who were invited. HEM noted the methodology used for the CTSSS vacancies was inefficient, as it meant applicants needed to apply to multiple identical postings to have the best chance of being hired, required CMS and IDOC to spend additional time validating separate applications from the same individuals, and may have resulted in IDOC conducting more interviews than optimal. HEM recommended CMS and IDOC reconsider their approach for combining sequences.

In response to this Advisory, on November 6, 2024, the CMS Deputy Director of Statewide Personnel issued a memo to all agency HR Directors and Personnel Managers instructing them that (with CMS Compliance approval) agencies should combine multiple vacancies for the same position into a single requisition in SF prior to posting. The memo also included step-by-step instructions for adding multiple positions to one requisition and filling the vacancies in the correct order. CMS stated that going forward, it would not approve the combination of separate requisitions into one interview sequence. IDOC responded separately, stating it would follow the guidance from CMS's November memo.

24-HEM-0028

HEM conducted a desk audit of a hiring sequence for a Grant Administrator position at the Illinois Department of Agriculture (AGR). In this sequence, an applicant appealed a disqualifying CMS Hiring Lead validation decision based on an inconsistent validation decision made by a different CMS Hiring Lead in an IDHS hiring sequence with the same minimum qualifications. The applicant's appeal was successful, and CMS returned the applicant to the applicant pool prior to AGR sending out its interview invitations, however, the applicant was not invited to interview. While HEM found the selection decision to be merit-based and justifiable, HEM recommended that CMS confirm whether any appeals have been resolved before notifying an agency it can proceed to inviting candidates. This will help facilitate the underlying purpose of the appeals process – to help erroneously disqualified applicants so that they can be appropriately and timely considered for State jobs.

HEM conducted a desk audit review of a hiring sequence for two Administrative Law Judge (ALJ) vacancies at the Illinois Property Tax Appeal Board (PTAB). HEM found the selection decisions to be merit-based and justifiable but noted the interviewer notes included observations from both interviewers suggesting they found one candidate's attire and surroundings during the virtual interview to be overly casual and unprofessional. The documentation reflected the interviewers apparently took these observations into account in scoring this candidate for some of the interview questions, although the questions did not pertain to professional appearance. HEM followed up with CMS for its feedback on when and how agencies should document and consider factors such as a candidate's interview attire and environment. The Chief Compliance Officer stated CMS sometimes receives requests from agencies to bypass a candidate for inappropriate comments or behavior during or after an interview. However, she said she was not aware of another instance in which an agency considered a candidate's appearance in scoring the candidate. The Deputy Director for the Bureau of Statewide Personnel confirmed the current CMS interviewer training does not explicitly address documentation of a candidate's appearance. However, he referenced sections of the training that advise interviewers to score candidates based on the preferred response to each interview question and to avoid being judgmental or unprofessional. He suggested adding an instruction to the forthcoming CMS Interviewer Training 2025 stating interviewers should not consider factors outside of a candidate's response to the particular interview question in awarding the candidate a score for each question, and to document any extraneous notes that the interviewer believes should be considered elsewhere in the scoring tool. HEM agreed with this suggestion and confirmed with CMS that this information will be included in the 2025 training. In the meantime, HEM recommended PTAB instruct employee-interviewers that candidates should be scored solely based on their responses to the hiring criteria and interview questions, and that if interviewers believe there are other factors related to a candidate's interview that may be relevant to the outcome of the hiring sequence, this should be documented separately and may be used to support a request to bypass the candidate, if necessary.

24-HEM-0062

HEM conducted a desk audit of a Human Services Grants Coordinator III position at the Illinois Department on Aging (IDoA). While HEM found the selection decisions to be merit-based and justifiable, HEM recommended that CMS Human Resource Team (HRT) and agency HR staff continue to list the preferred qualifications for a position in the order of importance and in descending applicable weight. In this sequence, the preferred qualifications were not assigned weights that correlated to their ranking. For example, preferred qualification 1 was assigned a 10% weight whereas preferred qualification 2 was assigned 20%. HEM also recommended that the “order of significance” language be added to the postings and not just stated in the position description. HEM noted that the ordering of the preferences helps applicants understand an agency’s needs and also avoids an appearance of altering weights and related points to benefit – or disadvantage – a specific applicant.

24-HEM-0060

HEM issued an Advisory regarding its work with IDOC and the Governor’s Office on a collaborative effort to establish a formal competitive selection process for selecting staff for indefinite, full-time assignments to the IDOC Intelligence and Investigations Division (IID). This work was initiated in response to the OEIG’s founded report in case no. 20-00408. This matter is synopsised in the Developments & Updates section of this report.

24-HEM-0078

In response to a complaint referral, HEM reviewed separate hiring sequences for Adjutant positions at two Veterans Homes (VH 1 and VH 2) operated by IDVA to determine whether the participation of an IDVA employee (Employee A) as an interviewer in the VH 1 sequence gave the employee an unfair advantage when she subsequently interviewed as a candidate in the VH 2 sequence. HEM compared the interview questions and preferred responses for the two sequences. While the two sequences did not use any of the same interview questions, there was some overlap in the preferred responses. HEM reviewed the responses to the interview questions provided by Employee A in the VH 2 sequence, as documented in the interviewer notes, and determined that even though Employee A provided strong responses to the questions that supported their high scores, her answers did not seem to be overly tailored to the preferred responses in either sequence.

While HEM found Employee A's selection in the VH 2 sequence to be merit-based and justifiable, it made two recommendations regarding interviewer selection. First, it appeared that Employee A was assigned to be an interviewer in the VH 1 sequence because she had been temporarily assigned to the Adjutant position at VH 2, and therefore had knowledge of the Adjutant role. HEM recommended that going forward, to avoid giving one interviewee an unfair advantage – or the appearance of an unfair advantage – over other candidates, IDVA should refrain from assigning an employee to serve as an interviewer for the same position to which he or she is currently temporarily assigned at another IDVA location. Second, HEM noted that one of the interviewers in the VH 2 sequence had served as an interviewer with Employee A in the VH 1 sequence, in which they would have discussed candidate qualifications and scoring in relation to the position duties and qualifications. HEM recommended that in the future, IDVA reconsider whether an employee should participate as an interviewer in a hiring sequence involving a candidate who was the employee's co-interviewer in a previous hiring sequence, particularly where the sequences involve the same title, as occurred here. HEM also found that one of the interviewers in the VH 2 sequence did not document any score for one of the candidates for one of the interview questions, which was worth 10% of the total interview score. While the interviewer's scoring omission for this candidate appeared to be inadvertent and did not impact candidate selection for this particular sequence, HEM recommended IDVA be mindful to avoid similar mistakes in the future, as such errors have the potential to alter candidate hiring decisions.

23-HEM-0065

In response to two complaint referrals, HEM reviewed the reposting of position number 40070-28-32-400-00-01 at the Illinois Department of Innovation & Technology (DoIT). This sequence would be DoIT's third attempt to fill it in two years. When the selected candidate resigned after the first sequence, the agency was within the time frame allowed to offer the position to the next-ranked candidate, who was Employee B. Yet, the agency did not do so, and posted the position again. Then again, in Sequence 2, the selected candidate resigned within the time frame where the agency could have extended an offer to the next-ranked candidate, which was not Employee B. Thus, while HEM found the selection decision was merit-based and justifiable in the third sequence, HEM recommended that the agency consider returning to a candidate pool if the selected candidate resigns within a short time frame as provided in CEP ¶ 42.

Additionally, HEM noted that Employee B was interim assigned to the subject position for over two years before being selected for it. As a result, HEM reminded DoIT to ensure that the appropriate documentation is in place for all interim assignments and, when possible, rotate interim assignments so that employees have the same opportunities to gain experience and to mitigate the perception of favoritism.

HEM Advisory Updates

22-HEM-0002

On November 6, 2024, HEM received a response from the Illinois Department of Children and Family Services (DCFS) to Advisory 22-HEM-0002 which was issued on August 30, 2024. In HEM Advisory 22-HEM-0002, HEM asked DCFS to provide a plan for moving forward with the pending SuccessFactors (SF) requisition (req.) numbers 27177 and 28823. HEM also asked DCFS to address concerns regarding the overuse of the same interview questions and ideal responses and the potential for internal candidates to have prior exposure to interview questions and ideal answers giving them an unfair advantage. Lastly, HEM asked DCFS to address its failure to accurately notify CMS Compliance of HEM's involvement in SF req. number 35128.

DCFS responded that “due to the age of these sequences and the staleness of the interview pools,” DCFS planned to cancel and repost SF req. numbers 27177 and 28823. In its response DCFS outlined new policies and practices it planned to implement to reduce the repeated use of interview materials and to secure its interview materials from internal candidates. DCFS stated that it would maintain a bank of five to seven interview questions for each core competency of DCFS's frequently posted positions such as Day Care Licensing Supervisor, State Central Register Supervisors, and Area Administrators. From that bank of interview questions and ideal answers, DCFS will develop new interview materials for each sequence. Additionally, before a new requisition is posted, a DCFS Transactions Liaison will need to contact DCFS Classifications to obtain updated interview materials; DCFS Transactions staff will be directed not to save interview tools to their personal hard drives; and all interview tools will be stored on a shared drive that is only available to members of the DCFS Classifications team. The DCFS Office of Employee Services (OES) will also amend the invitation to interview to ask candidates that are also current DCFS employees to identify their involvement in the last 12 months as a subject matter expert or any other function that would require the completion of a Disclosure Form via email prior to the start of interviews. Regarding SF req. number 35128, DCFS explained that its failure to accurately relay information to CMS Compliance was due to a gap in information sharing and that it “did not deliberately ignore any instruction from HEM or purposefully submit any incorrect information.” To address this gap, DCFS assigned a DCFS Transactions Supervisor and DCFS OES personnel to matters identified by HEM.

V. HEM Exempt Reviews

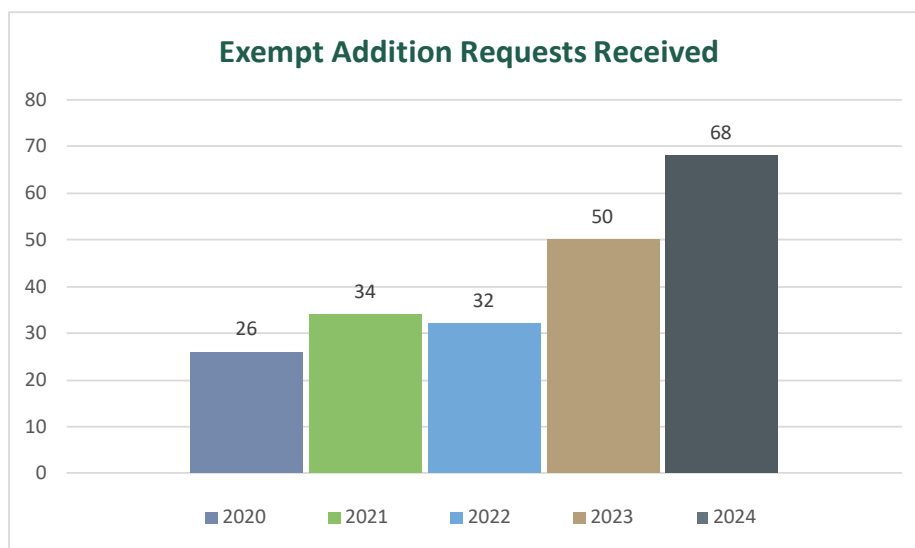
Exempt List

In 2019, Federal court orders entered in the Shakman litigation led to the creation of: the Exempt List, a comprehensive list of exempt positions for which hiring and employment decisions may be made on the basis of political or other non-merit factors; and an Exempt Employment Plan for filling positions on the Exempt List. The Exempt Employment Plan provides that candidates selected for exempt positions must meet the minimum qualifications and perform the duties of the exempt position being filled as set forth in the underlying position description.

The Exempt Employment Plan also sets forth procedures for adding or deleting positions to or from the Exempt List, providing that only the Governor or the Executive Inspector General may initiate such a change. HEM reviews all Exempt List addition and deletion requests from the Governor’s Office and recommends approval of or objection to the proposed change to the EIG, who must respond to the Governor’s request within ten business days.

Exempt List Requests Continue to Increase

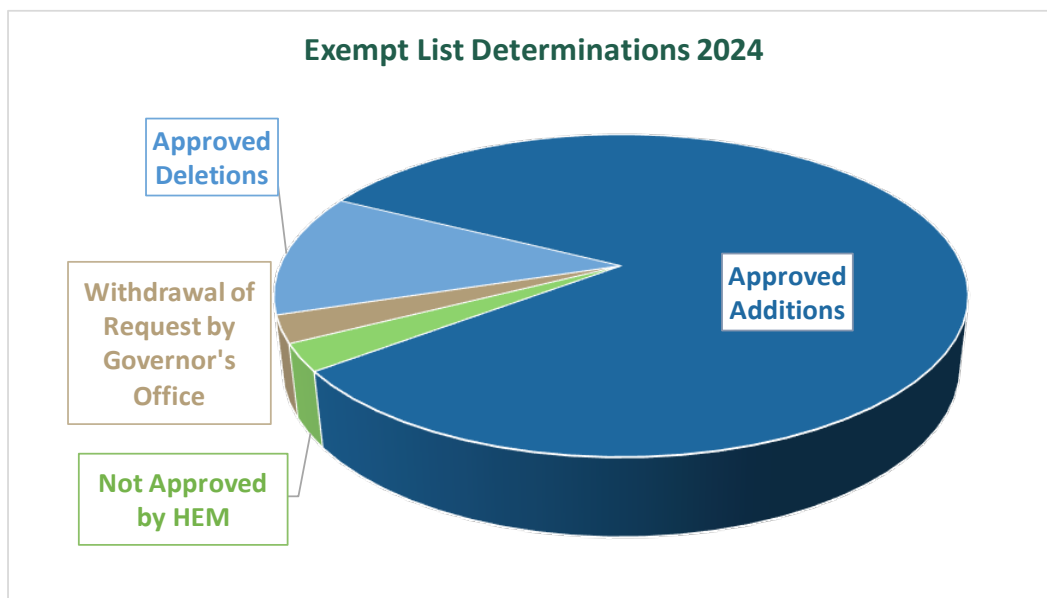
In 2023, HEM saw significant growth in the number of Exempt List addition requests HEM received. Again, this calendar year of 2024, HEM saw a similar rise in the number of Exempt List addition requests.



In order for the OEIG to agree that a position should be added to the Exempt List, the requesting entities need to submit a position description that reflects independent policymaking or confidential work such that political affiliation is an appropriate consideration for effective performance. To ensure that the incumbent will be performing and reporting on the work set forth in the position description, HEM conducts a comprehensive review of all available information and it works with the requesting agency, CMS, and the Governor's Office, to assess related factors, including:

- The support for the position, and whether it is required by or in keeping with the underlying legislative or executive initiative that prompted the request.
- Existing staff, both the percentage of exempt and non-exempt, that can complete the work, and whether this staff is employed full-time or on-contract.
- The reporting structure for the position, including both the supervisor and subordinate positions.

HEM assesses these factors to help ensure that the policy work of the proposed position can or will be meaningfully implemented, and to support the subsequent certifications from Agency Personnel Officers that the incumbents in Exempt List positions are performing the duties described in the position description. As a result of these considerations, in 2024, HEM did not approve two exempt addition requests, and after discussion with HEM, the Governor's Office withdrew an additional three exempt requests. The following table reflects HEM's determinations on Exempt List requests this year.



The table below reflects HEM's approvals of Exempt List change requests by agency during the Fourth Quarter of 2024.

Exempt List Additions and Deletions by Agency - Fourth Quarter 2024		
Agency/Entity	Working Title	OEIG Determination
Illinois Capital Development Board	Policy Advisor	Approved Addition
Illinois Capital Development Board	Chief Financial Officer	Approved Addition
Illinois Capital Development Board	Policy Advisor	Approved Deletion
Illinois Capital Development Board	Administrator, Fiscal	Approved Deletion
Illinois Capital Development Board	Executive Assistant I	Approved Deletion
Illinois Criminal Justice Information Authority	Community Engagement Liaison	Approved Addition
Illinois Department of Early Childhood	Chief Operations Officer	Approved Addition
Illinois Department of Early Childhood	Director of Communications	Approved Addition
Illinois Department of Early Childhood	Director of Legislative Affairs	Approved Addition
Illinois Department of Early Childhood	Agency Procurement Officer	Approved Addition
Illinois Department of Healthcare and Family Services	Director of Healthcare Transformation Collaboratives	Approved Addition
Illinois Department of Human Services	Assistant Director - Field Operations	Approved Addition
Illinois Department of Innovation and Technology	Deputy Chief Information Security Officer (CISO) – Security Operations & Technology	Approved Addition
Illinois Department of Innovation and Technology	Deputy Chief Information Security Officer (CISO) – Security Business Alignment & Governance	Approved Addition
Illinois Department of Innovation and Technology	Chief Compliance Officer	Approved Addition
Illinois Department of Veterans' Affairs	Legislative Liaison	Approved Addition
Illinois Emergency Management Agency - Office of Homeland Security	Deputy Legal Counsel and Ethics Officer	Approved Addition
Illinois Prisoner Review Board	Chief Fiscal Officer	Approved Addition
Illinois State Police	Assistant Deputy Director - Division of Statewide 9-1-1	Approved Addition

In addition to modifications to the Exempt List, HEM staff reviews notification paperwork (also referred to as the exempt certification paperwork) for all exempt appointments to ensure compliance with the Exempt Employment Plan. This includes confirming that appointees meet the minimum requirements for the position. HEM also receives clarifications to exempt position descriptions from CMS. HEM's exempt reviews are described in the table below.

Exempt Reviews Conducted	Fourth Quarter 2024	Calendar Year 2024
Exempt appointment notifications/certifications received and reviewed for positions on the Exempt List	83 (No objections)	300
Exempt position description clarifications received	5 (No objections)	43
Exempt List addition requests received	7	68
Exempt List addition requests approved or not objected to	16	60
Agency withdrawal of Exempt List requests	2	3
Exempt List addition requests not approved	1	2
Exempt List deletion requests received	0	9*
Exempt List deletion requests approved	3	9
Exempt List modification requests received	0	5
Exempt List modification requests approved	0	5
Exempt List pending requests	6	6
Exempt personal services contracts (PSCs) received for review	3	10
Exempt PSCs approved or not objected to	0	7
Exempt PSCs not approved	1	1
Agency withdrawal of exempt PSC request	0	1
Exempt PSCs pending	2	2

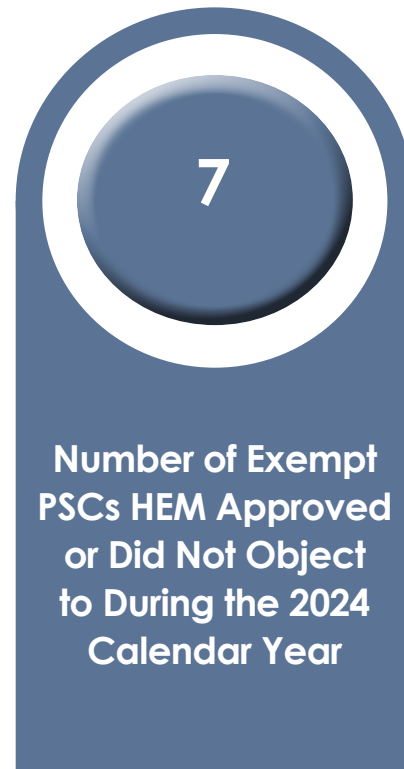
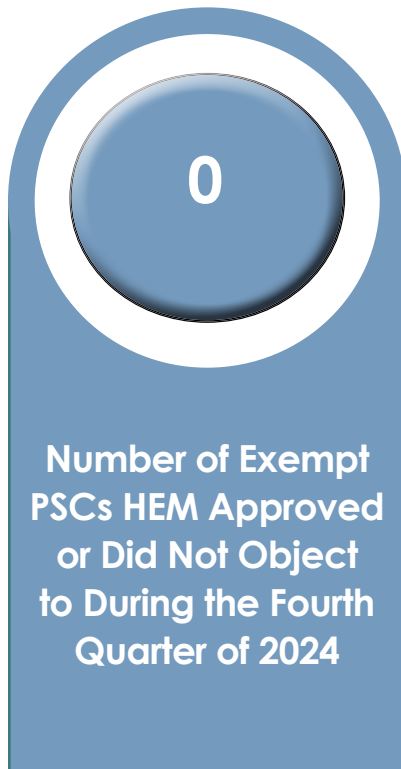
*One exempt deletion request made this year was prompted by HEM.

Exempt Personal Services Contracts

Effective July 15, 2021, the amended CEP requires agencies that seek to hire an individual to perform duties that are consistent with exempt work through use of a PSC to submit the request in writing to the CMS Chief Compliance Officer and HEM. (See paragraph 68 of the amended CEP.) The request – which must be submitted prior to the individual starting work under the PSC – must include the rationale for the PSC, a copy of the proposed contract, and certification that the work to be performed is exempt work and the contractor is minimally qualified to perform that work.

HEM reviews this documentation, as well as any available information related to the basis for the request, scope and exempt nature of the work, and the appropriateness of the minimum requirements. HEM often contacts the agency or CMS for additional background information or requests a meeting to discuss the request further. HEM must respond within five business days to the agency and the Governor’s Office.

This quarter, HEM did not approve any exempt PSCs.



VI. Non-Exempt PSC Reporting

As agreed upon and stated in the CEP, agencies are required to report all PSCs, including renewals or amendments to such contracts, to CMS Compliance and HEM on a quarterly basis. On December 18, 2024, CMS Compliance provided the State's PSC Report for the third quarter of calendar year 2024. The following table summarizes this information:

Data from the State's Personal Services Contract (PSC) Report for the Third Quarter of CY 2024	Count
State entities that submitted a PSC report to CMS	54
State entities that decreased their use of PSCs from the previous quarter	11
State entities that increased their number of PSCs	10
State entities that did not have a change in PSCs	33
State entities that reported not utilizing any PSCs	18

The following is a summary showing CMS' reports regarding PSCs reported in the last quarter of 2023 and first three quarters of 2024:¹

Agency	# of PSCs Reported Q4 2023	# of PSCs Reported Q1 2024	# of PSCs Reported Q2 2024	# of PSCs Reported Q3 2024
Abraham Lincoln Presidential Library and Museum	0	0	0	2
Arts Council	0	0	0	0
Capital Development Board	3	3	3	2
Civil Service Commission	0	0	0	0
Commerce Commission	n/a	n/a	n/a	0
Commission on Equity and Inclusion	n/a	n/a	n/a	0
Council on Developmental Disabilities	0	0	0	0
Criminal Justice Information Authority	29	29	36	37
Deaf and Hard of Hearing Commission	1	1	1	1
Department of Agriculture	38	40	52	61
Department of Central Management Services	10	14	3	3
Department of Children and Family Services	Not Reported	5	3	2
Department of Commerce and Economic Opportunity	17	19	19	19
Department of Corrections	9	9	9	13
Department of Employment Security	20	17	19	16
Department of Financial and Professional Regulation	34	49	33	32
Department of Healthcare and Family Services	34	36	21	27
Department of Human Rights	2	2	3	3
Department of Human Services	123	93	95	82
Department of Innovation and Technology	15	37	24	24
Department of Insurance	1	0	0	0
Department of Juvenile Justice	13	14	13	13
Department of Labor	1	1	0	0
Department of Lottery	1	0	0	0
Department of Military Affairs	0	0	0	0
Department of Natural Resources	138	145	111	126
Department of Public Health	38	30	19	16
Department of Revenue	10	5	7	8
Department of Transportation	1	1	5	5

¹ The report does not include PSCs used to pay for the support necessary to meet the accommodations for persons with disabilities. Individuals employed in this way are hired by the person in need of the accommodation without the State's involvement. Thus, the CEP does not apply to these types of contracts.

Agency	# of PSCs Reported Q4 2023	# of PSCs Reported Q1 2024	# of PSCs Reported Q2 2024	# of PSCs Reported Q3 2024
Department of Veterans' Affairs	Not Reported	10	12	15
Department on Aging	9	10	9	8
Educational Labor Relations Board	1	1	1	1
Emergency Management Agency and Office of Homeland Security	7	8	13	11
Environmental Protection Agency	0	0	2	2
Gaming Board	9	9	7	8
Guardianship and Advocacy Commission	Not Reported	1	1	1
Human Rights Commission	0	0	0	0
Independent Tax Tribunal	0	0	0	0
Labor Relations Board	1	1	0	0
Law Enforcement Training and Standards Board	1	1	1	1
Liquor Control Commission	1	1	5	1
Pollution Control Board	0	0	0	0
Power Agency	0	0	0	0
Prisoner Review Board	1	1	0	0
Property Tax Appeal Board	4	4	5	5
Racing Board	4	1	2	2
Sentencing Policy Advisory Council	1	0	1	1
State Board of Investments	n/a	n/a	n/a	0
State Employees' Retirement System	6	8	7	10
State Fire Marshal	0	0	0	0
State Police	14	13	13	1
State Police Merit Board	0	0	0	0
Torture Inquiry and Relief Commission ²	15	5	5	n/a
Workers' Compensation Commission	6	6	7	5
TOTAL PSCs Reported	618	630	567	564

² CMS Compliance noted that the PSCs previously reported by the Torture Inquiry and Relief Commission (TIRC) had been hired via procurement. CMS Compliance is currently working with TIRC to correct this to the CMS PSC approval process.

VII. Political Contact Reporting

State employees are required to report instances where an elected or appointed official of any political party or any agent acting on behalf of an elected or appointed official or political party attempts to affect any hiring or employment action for a Non-Exempt Position by contacting State personnel involved in an employment action whether in person, in writing, by telephone, by facsimile, by e-mail, or any other means. Pursuant to the CEP, any State employee who receives or has reason to believe such Political Contact has occurred, or is occurring, is required to report it to CMS or HEM within 48 hours of learning of such Political Contact. CMS is required by the CEP to maintain records documenting all reports of Political Contacts and Political Discrimination.

This quarter, HEM received five reports of Political Contacts, summarized below:³

- Three reports were filed by two IDOT employees regarding inquiries by legislative staffers about constituents' applications for IDOT positions. CMS Compliance agreed with IDOT's responses.
 - The first inquiry was made by an Illinois State Representative's staffer about a constituent's application for a winter help position. The IDOT Director of Legislative Affairs who filed the report responded to the staffer that he cannot weigh in on personnel issues.
 - The second inquiry was made by an Illinois State Senator's staffer to an IDOT Constituent Liaison about a constituent's application. CMS Compliance advised the IDOT Liaison to only provide publicly available information on the IDOT employment hiring process and/or direct the candidate to the appropriate IDOT career services agent.
 - The third inquiry was made by an Illinois State Representative's staffer about a constituent's application for a snowbird position. The IDOT Director of Legislative Affairs who filed the report responded to the staffer that he cannot weigh in on personnel issues.

³ Prior reports of Political Contacts made in 2024 are summarized in the previous quarterly reports.

- One report was made by an IDES employee who shared that she was sent an inquiry by an Illinois State Senator regarding an employment issue a constituent was having. CMS Compliance asked how IDES had responded, and IDES stated that the Legislative Director told the staffer that they were unable to provide any information because it involved a personnel matter.
- One report stated that an applicant for an IDHS position listed two Illinois Representatives as references. CMS Compliance directed IDHS to disregard the references during the hiring process.

VIII. Investigative Division

The OEIG's Investigative Division receives approximately 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. Cases may also be transferred to the Investigative Division from HEM when a HEM review reveals evidence of intentional wrongdoing that requires a more in-depth inquiry, or evidence of unlawful political discrimination.

After an investigation, the OEIG issues (1) a summary report concluding reasonable cause exists to believe a violation has occurred (a "founded summary report"), or (2) a statement of the decision to close the investigation when there is insufficient evidence that a violation has occurred (an "unfounded summary report"). Founded summary reports document:

- the allegations of wrongdoing;
- facts confirmed by the investigation;
- an analysis of the facts in comparison to the applicable law, rule, or policy; and
- findings and recommendations.

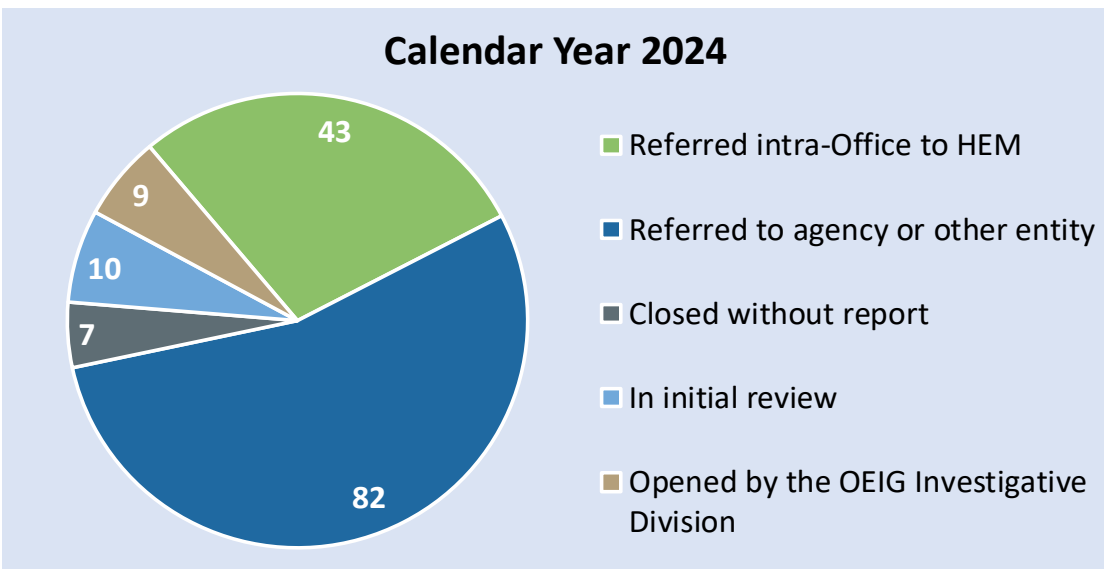
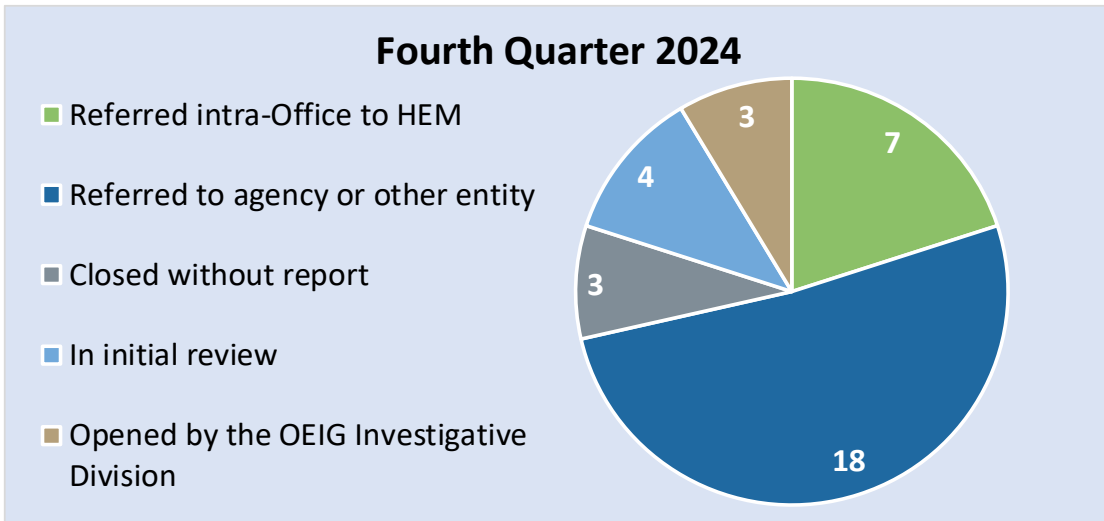
In accordance with State law, the OEIG provides founded reports to the head of each agency affected by or involved with the investigation and the appropriate ultimate jurisdictional authority. The agency or ultimate jurisdictional authority is required to respond to the report and its recommendations within 20 days. Within 30 days after receiving the agency response, the OEIG must forward a copy of the founded report and the agency response to the Executive Ethics Commission (EEC).⁴ Pursuant to the Ethics Act, the EEC is the only entity permitted to determine the public release of OEIG founded summary reports.

⁴ The exception is when the OEIG forwards a complaint to the Attorney General's Office to pursue an Ethics Act violation before the EEC.

Hiring-Related Complaints



Actions Taken on Received Complaints



Hiring-Related Investigations

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

Hiring-related Investigations	Fourth Quarter 2024	Year-End 2024
Hiring-related investigations pending at the close of the quarter/year	13	13
Hiring-related investigations closed	2	14
Founded reports related to hiring issued	0	0
Founded reports related to hiring made available to the public	0	1

This quarter, the EEC did not make any OEIG founded reports related to hiring available to the public. Previous publicly released reports are available at www.inspectorgeneral.illinois.gov.

IX. Appendices

OEIG Leadership

Susan M. Haling, Executive Inspector General

Ms. Haling was first nominated as Executive Inspector General in March 2018, and was most recently reconfirmed by the Illinois Senate on April 11, 2024. She first joined the OEIG in December 2011 as Special Counsel and served as the First Assistant Inspector General beginning in 2015. In addition, she has more than nine years of experience as an Assistant U.S. Attorney in Chicago, where she tried over 20 criminal trials. Ms. Haling also previously worked for the U.S. Justice Department, Criminal Division, in Washington, D.C. Ms. Haling was a law clerk for the Honorable James F. Holderman, a former U.S. District Judge for the Northern District of Illinois. Ms. Haling received her BA from the University of Notre Dame and obtained her law degree from the DePaul University College of Law, where she graduated Order of the Coif, served as editor for the Law Review, and was a member of the Moot Court Trial Team.

Neil P. Olson, General Counsel

Mr. Olson returned to the OEIG in May 2018 and serves as General Counsel. Mr. Olson previously worked at the OEIG as Deputy Inspector General and Chief of Springfield Division before leaving the OEIG in 2013 to serve as General Counsel in the Office of the Illinois State Treasurer. Prior to his return to the OEIG, Mr. Olson also served as an Assistant Attorney General and then the Deputy Public Access Counselor in the Office of the Illinois Attorney General. He also previously worked for the Massachusetts Attorney General's Office, the Massachusetts Commission on Judicial Conduct, as a litigator in private practice, and as the law clerk to the Honorable Kenneth Laurence of the Massachusetts Appeals Court. Mr. Olson is a graduate of Grinnell College and Northeastern University School of Law and is licensed to practice law in Massachusetts and Illinois.

Fallon Opperman, Deputy Inspector General and Chief of Chicago Investigative Division

Ms. Opperman joined the OEIG as an Assistant Inspector General in June 2008 and then served as Chief of the Regional Transit Board Division. As Deputy Inspector General and Chief of Chicago Division since February 2015, Ms. Opperman manages the investigative activities of the OEIG's Chicago office, including oversight of the Regional Transit Board Division. Ms. Opperman received a BA from North Central College and obtained her law degree from the DePaul University College of Law.

Erin K. Bonales, Director of Hiring & Employment Monitoring

Ms. Bonales is responsible for directing the OEIG's Hiring & Employment Monitoring Division, which engages in compliance reviews and monitoring activities related to hiring and employment decisions, policies, and practices. Ms. Bonales previously worked for the OEIG for nearly eight years, including serving as Deputy Inspector General and Chief of the Chicago Investigative Division. Prior to joining the OEIG in May 2006, Ms. Bonales was an Assistant General Counsel for the Illinois Department of Human Services for approximately five years. Ms. Bonales received a JD from the University of Illinois College of Law, and a BA in Political Science from Southern Illinois University.

Christine P. Benavente, Deputy Inspector General - Executive Projects

Ms. Benavente joined the OEIG as an Assistant Inspector General in August 2011 and later served as a Legislative Assistant Inspector General. As Deputy Inspector General-Executive Projects, Ms. Benavente leads numerous executive projects, including overseeing the Division of External Compliance & Outreach, serving as the legislative attorney for all legislative matters pertaining to the OEIG, and serving as the Diversity, Equity, and Inclusion Coordinator. Prior to working at the OEIG, she was an Associate at Jenner & Block, LLP. Ms. Benavente obtained her law degree from DePaul University College of Law, where she graduated Order of the Coif and magna cum laude. During law school, she served as Editor-in-Chief of the Women's Law Caucus Digest and Moot Court Representative for the Hispanic National Bar Association. She obtained BAs from the University of Iowa.

Angela Luning, Deputy Inspector General and Acting Chief of Springfield Investigative Division

Ms. Luning joined the OEIG as an Assistant Inspector General in 2012, became a Deputy Inspector General for Investigations in 2015, and currently also serves as Acting Chief of the Springfield Division. Ms. Luning previously served as an Assistant State's Attorney in the Will County State's Attorney's Office, an Assistant Attorney General, and an Assistant Corporation Counsel for the City of Chicago; she also was a law clerk to the Hon. George W. Lindberg in the U.S. District Court for the Northern District of Illinois. Ms. Luning has a BA from Yale University, and received her law degree from Loyola University Chicago, where she served as the Executive Editor for Lead Articles on the Loyola University Chicago Law Journal.

Ogo Akpan, Chief Fiscal Officer and Operations Manager

Ms. Akpan joined the OEIG as Chief Fiscal Officer/Chicago Operations Manager in December 2021. She provides leadership and management of all financial operations of the agency and is also responsible for administrative operations of the Chicago office. Prior to the OEIG, she worked as a Certified Public Accountant for the Illinois Office of the Comptroller. She previously held finance leadership roles in the private sector responsible for accounting, finance, and data analytics functions. Ms. Akpan received her Bachelor of Science in Accounting from the University of Nigeria, obtained her MBA from Schulich School of Business, York University Toronto Canada, and is a Certified Public Accountant in the State of Illinois.

Percentage of Exempt Positions by Agency - Fourth Quarter 2024

Agency	Agency Headcount ⁵	% Exempt Positions ⁶
Abraham Lincoln Presidential Library and Museum	92	14%
Aging	154	11%
Agriculture	502	4%
Arts Council	18	22%
Capital Development Board	152	16%
Central Management Services	739	7%
Children and Family Services	3,629	2%
Civil Service Commission	4	25%
Commerce and Economic Opportunity	383	13%
Commission on Equity and Inclusion	26	27%
Corrections	11,704	1%
Council on Developmental Disabilities	9	11%
Criminal Justice Information Authority	126	12%
Deaf and Hard of Hearing Commission	4	50%
Early Childhood ⁷	30	27%
Emergency Management Agency	204	10%
Employment Security	1,062	3%
Environmental Protection Agency	754	2%
Financial and Professional Regulation	465	14%
Gaming Board	184	9%
Guardianship and Advocacy Commission	127	9%

⁵ The agency headcount was obtained from the FY2024 SERS Headcount Tracker Table (June 2024) provided in the FY2025 Budget Summary.

⁶ The percentage was obtained using the number of exempt positions on the January 2, 2025 Exempt List and the agency headcount.

⁷ The agency headcount was based on the FY2025 Target headcount in the Illinois State Budget Fiscal Year 2025 (Operating Budget).

Agency	Agency Headcount	% Exempt Positions
Healthcare and Family Services	2,015	2%
Human Rights	128	13%
Human Services	14,209	1%
Innovation & Technology	1,239	5%
Insurance	239	13%
Juvenile Justice	721	7%
Labor	109	13%
Liquor Control Commission	45	24%
Lottery	156	6%
Military Affairs	190	2%
Natural Resources	1,419	2%
Prisoner Review Board	29	17%
Property Tax Appeal Board	36	17%
Public Health	1,257	4%
Revenue	1,325	3%
Sentencing Policy Advisory Council ⁸	4	25%
State Fire Marshal	164	5%
State Police	2,823	1%
Transportation	5,249	2%
Veterans' Affairs	1,239	2%
Workers' Compensation Commission	137	12%
Total	53,101	2.38%

⁸The agency headcount was based on information found on the agency's website.

Hiring-Related References

OEIG Hiring and 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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