Illinois Ethics Matters

Honesty • Integrity • Service

July 15, 2026

A Newsletter from the Office of Executive Inspector General for the Agencies of the Illinois Governor

Susan M. Haling
Executive Inspector General

Neil P. Olson
General Counsel

Fallon Opperman
Chief of Chicago Division

Erin K. Bonales
Director, Hiring & Employment Monitoring Division

Christine Benavente
Deputy Inspector General-Executive Projects

Angela Luning
Chief of Springfield Division

Ogo Akpan
Chief Fiscal Officer

To file a complaint with the OEIG, visit oeig.illinois.gov

Or call us at:
(312) 814-5600
Main Line

(866) 814-1113
Hot Line

Revolving Door Reminders

◆ The Revolving Door Notification Duty Exists for One Year

State employees on the "c-list" are required to notify the OEIG of prospective non-state employment for one year following the termination of state employment. This means that even if one job opportunity was approved when the employee left state employment, any new employment opportunity must also be approved if it falls within the following year.

◆ Employee Must Have Firm Offer of New Employment or Actual Clients

Any c-lister who is "offered non-State employment" must notify the OEIG for a revolving door determination. This means that there must be a firm ***offer*** of employment in order for the OEIG process to start. Starting to interview with a new employer is not sufficient for the OEIG to make a determination of whether the employee is eligible to accept a potential offer that may result from the interview process.

Similarly, for employees forming a sole proprietorship, it is not sufficient to identify "various clients" in a revolving door application. A sole proprietor should identify actual clients in an application when leaving state employment and in the year following.

◆ Employee Must File Prior to Acceptance of Offer

The Ethics Act is also clear that a c-lister must notify the OEIG "***prior to accepting***" non-state employment. To avoid delay, the law requires the OEIG to make a determination within 10 calendar days. If the employee wants to convey to an employer that they intend to accept the offer, the employee may consider a "conditional acceptance" making final acceptance of the job offer contingent upon the OEIG's final approval. The OEIG is available to answer any questions from prospective employers about the revolving door determination process.

◆ Leaving State Employment Must Be Imminent

When assessing whether an employee is eligible to accept non-state employment, the OEIG looks back one year from the termination of state employment to examine whether the employee's participation in contractual or regulatory decisions was personal and substantial. If an employee's projected date to leave the state is too far in the future, the OEIG cannot assess the full year of the employee's work. Thus, the OEIG may decline to process an application that is more than 60-90 days prior to the planned termination date.