



# Illinois Ethics Matters

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*Honesty, Integrity, Service*

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

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## Announcements

- The OEIG is pleased to announce the hiring of **Jacob Blanchette** as an Investigator and **Shannon Glover** as an Assistant Inspector General. Both will work out of the Chicago office.
- OEIG staff presented at the Executive Ethics Commission's Ethics Officer Conference on May 2, 2023. The OEIG thanks the EEC for this opportunity to present "Ethics Officer 101." The OEIG regularly conducts orientation sessions for new Ethics Officers, and will do so again this June. Please contact the OEIG if you are interested in attending an orientation session.

## IDOT Blanket Recusal Policy Ignored

As State employees are aware, the so-called "revolving door" provisions of the Ethics Act prohibit them from accepting non-State employment with a vendor for a period of a year after the termination State employment, when they have "personally and substantially" participated in the award or fiscal administration of a contract with that vendor within the year prior to leaving State employment. State agencies must determine which employees, by the nature of their duties, may participate personally and substantially in the awarding of such contracts. The names of these employees are placed on a list commonly referred to as a "c-list"; these employees are required to notify the OEIG prior to accepting a non-State position.

The Illinois Department of Transportation (IDOT) contracts with numerous vendors on construction projects, and has a large c-list. As a result, IDOT employees accounted for 68 of the 291 (23%) c-list determinations made by the OEIG in FY 2022—the most of any State agency. IDOT has also accounted for the most determinations since the revolving door process was instituted in 2010.

The OEIG discovered during an investigation that there had been a long-standing practice at IDOT of employees attempting to avoid revolving door restrictions by abdicating their job duties relating to procurement and having other employees take up that slack for a year prior to their departure. Seemingly, IDOT had recognized this issue and put into place a policy with a prohibition on any recusals involving "all" future employers – known as a blanket recusal.

The OEIG investigation revealed, however, that blanket recusal policy had not been followed by numerous employees, including those in the highest levels at IDOT, including the then-Acting Secretary. As one employee put it, "4,000" IDOT employees had engaged in blanket recusals over the years in an effort to avoid revolving door restrictions and keep post-State employment options open.

The OEIG recommended that the Office of the Governor work with IDOT to ensure that IDOT employees are working for the State's interest and not abdicating their duties for a year regarding all vendors in order to preserve their own speculative employment prospects. The Governor's Office responded that new legal staff at IDOT was in the process of updating a recusal policy that will ensure that recusals are tailored, that blanket recusals are not approved, and that appropriate scrutiny is provided to recusals before they are approved. Case No. 20-02136 is available on the OEIG website [here](#).