



BUREAU OF HUMAN RESOURCES

LETITIA DOMINICI

COMPLIANCE OFFICER

118 North Clark Street, Room 868 • Chicago, Illinois 60602 • (312) 603-6857

TONI PRECKWINKLE

PRESIDENT

**Cook County Board
of Commissioners**

RICHARD R. BOYKIN
1st District

ROBERT B. STEELE
2nd District

JERRY BUTLER
3rd District

STANLEY MOORE
4th District

DEBORAH SIMS
5th District

JOAN PATRICIA MURPHY
6th District

JESUS G. GARCIA
7th District

LUIS ARROYO JR
8th District

PETER N. SILVESTRI
9th District

BRIDGET GAINER
10th District

JOHN P. DALEY
11th District

JOHN A. FRITCHEY
12th District

LARRY SUFFREDIN
13th District

GREGG GOSLIN
14th District

TIMOTHY O. SCHNEIDER
15th District

JEFFREY R. TOBOLSKI
16th District

SEAN M. MORRISON
17th District

September 14, 2015

Toni Preckwinkle, President
Office of the President
Board of Commissioners of Cook County
118 North Clark Street
Chicago, IL 60602

Patrick Blanchard, Independent Inspector General
Office of the Independent Inspector General
69 West Washington, Suite 1160
Chicago, IL 60602

Mary Robinson, Compliance Administrator
Office of the Compliance Administrator
69 West Washington, Suite 840
Chicago, IL 60602

RE: September 2015 Semi-Annual Report

Dear President Preckwinkle, Inspector General Blanchard and Ms. Robinson:

This is the seventh semi-annual report issued pursuant to the Employment Plan that was filed on March 19, 2012 and includes monitoring activities during the past six months. The compliance program has been working quite well and serves as an effective tool to ensure that non-exempt hiring and other employment actions are transparent and free from political influence. This report will be posted on the County's website as required by the Employment Plan.

Supplemental Policies:

As indicated in my previous report, the Offices of the Independent Inspector General, the County Auditor and I conducted a joint review of the interpretation and application of the Fair Labor Standards Act (FLSA) and the Supplemental Policy regarding Overtime and Compensatory Time. On February 2, 2015, the Summary Report was issued with recommendations and a response was issued on July 14, 2015.

Additionally, the Offices of the Independent Inspector General and Compliance Administrator have assisted me with an audit of disciplinary action. A Summary Report was issued with recommendations on July 20, 2015 and I am awaiting a response.

During this reporting period, Departments submitted 11 Requests for Reclassification with six completed; two denied; one withdrawn and position posted online; and, two are pending. Thirteen involving the Department of Transportation and Highway were completed. Forty-four Disciplinary Action forms were sent to the Bureau of Human Resources and me. Seven Interim Assignment Requests were granted with one rescinded as it did not meet the requirements in the Supplemental Policies. One Interim Assignment Request was denied. Seven Transfer Requests were granted.

All related documentation and forms have been forwarded to the Compliance Administrator's Office and the Office of the Independent Inspector General. I will continue to train Departments and monitor implementation of the Supplemental Policies.

Training Status:

Currently, annual online training is occurring. The modules include requirements for the Employment Plan, Department of Human Rights and Ethics and the Office of the Independent Inspector General. Supervisors/interviewers are required to take an additional module in order to remain certified to conduct interviews. From January through August 2015, 180 new employees attended orientation and were trained on the Employment Plan. During the same time period, 52 new supervisors completed in-person supervisory training.

Recently, one roundtables session was held with a new Commissioner to discuss the Inspector General's enabling legislation, the Employment Plan and an overview of the Ethics Ordinance.

Postings on Cook County's Website:

Quarterly reports were posted on the County website for the third and fourth quarters of 2014 as mandated by the Employment Plan. Employment action reports for the first quarter of 2015 are being reviewed and additional quarterly reports will be posted soon. The Bureau of Human Resources website has been updated to include amendments to the Employment Plan, Supplemental Policies, the exempt list with the names of employees holding exempt positions and exempt job descriptions.

Requests to Hire/Job Descriptions:

The Bureau of Human Resources processed approximately 148 Request to Hire forms during the last six months, of which I reviewed 16. Additionally, I reviewed approximately 37 job descriptions.

Randomizations:

During this monitoring period, 81 randomizations occurred with two minor issues that were identified. For example, when a department requested additional candidates to fill a vacancy, an interview list was created with all candidates that were veterans. Usually, the non-veterans are randomized when an interview list is created but this step did not occur. The remaining pool of candidates was randomized per the Employment Plan. I only monitored three randomizations as I am provided the pre-randomized and randomized preliminary eligibility lists that I use to review validation steps.

Actively Recruited Positions:

The Actively Recruited Position Hiring Process allows Departments to review applications, without randomizing candidates, and to create interview lists. During this reporting period, I monitored two Application Review Panels from the Comptroller's Office and the Revenue Department. The Public Defender's Office hires attorneys using the same process as Actively Recruited Positions and is the only department that conducts second interviews. This process continues to be

working well with few issues other than reinforcing the fact with two departments that a pre-meeting cannot occur.

Validation of Candidates/Interview Lists:

Since the last report, I have reviewed approximately 134 interview lists that the Bureau of Human Resources staff generated after reviewing online applications. As in previous reports, I must commend the Bureau of Human Resources staff I work with each day. They are responsible for general hiring and are extraordinary in implementing the steps in the Employment Plan. "Dual" validation of technical minimum qualifications occurred on ten occasions with assistance predominantly from the Bureau of Technology.

Recommendation Letters:

Approximately 263 recommendation letters have been submitted to me and processed with some logged as political contacts and sent to the Office of the Independent Inspector General and Compliance Administrator's Office. Twenty-three letters were non-compliant with the Employment Plan.

Interviews/Selection Meetings Monitored:

I have monitored some or all interviews for twelve job postings and attended seven selection meetings. During this reporting period, I examined 91 hiring packets to ensure that paperwork processed at the end of a hiring sequence complied with the Employment Plan.

Complaints:

Since the last report, the following five Incident Reports were issued:

Complaints # 15-002 and 15-005 were investigated separately to determine whether or not Section V, General Hiring, of the Employment Plan was violated in two instances where the internal applicants presented transcripts that did not show a degree was conferred prior to the end of the last interview. Both internal applicants had obtained their degrees years ago but the official transcripts did not contain any information that the degree was conferred. The candidates obtained corrected transcripts; however, there was no evidence that there was noncompliance or a violation of the Employment Plan when they could not move forward in the hiring process.

I initiated Complaint # 15-003 when I discovered that an employee participated in the hiring process without having been trained and certified as an interview panel member. There was evidence that the Plan was violated; however, I trained this employee who was certified to conduct interviews at the time the misstep was discovered and I had monitored the employee during interviews without issue. Recommendations were made for corrective action and, on June 29, 2015, I received a memo on the corrective measures that were taken by the Bureau of Human Resources.

Complaint # 15-004 was opened as a result of a complaint that a Department obtained an intern without following the placement steps in the Employment Plan. During the investigation, it was revealed that the student worked as an intern at the County without being placed in the Department as required by the Plan. I found that the Department technically violated the Plan and recommended that the Department Head be retrained on portions of the Employment Plan, including processes for hiring interns.

Complaint # 15-006 was opened as a result of information that the Bureau of Human Resources Analyst received that indicated a general hiring step was not followed. One internal candidate interviewed for a promotional vacancy and was ranked at the selection meeting. The Bureau of Human Resources Analyst offered her the promotion; however, the candidate already knew she was promoted. During the investigation, it was revealed that she asked her supervisor the status of the promotion and he told her she would be promoted. I did not find that there was any intention to bypass a step in the hiring process and found that there was a violation of the Plan. My recommendation to reinforce the hiring steps with the manager has occurred.

Complaint # 15-001 was opened as a result of noncompliance with the annual Employment Plan training requirement in 2014 and I issued an Amended Incident Report on March 3, 2015. The Bureau of Human Resources Report was issued on April 9, 2015. Memos were sent to Departments with non-compliant supervisors and employees, asking them to consider disciplinary action for these employees. To date, the Departments have not responded to the memos and I am hopeful that a follow-up memo is sent to the Departments requesting a response. Employees who did not take the 2014 online training have been required to attend face-to-face training for 2015 and I will include information on these employees in the next report. Please note that the 2015 annual online training began earlier than last year and department heads are notified of non-compliant employees at the end of the training period to ensure compliance.

On July 26, 2013, I issued an Incident Report for Complaint # 13-005, finding a violation of the Employment Plan with the Office of the Public Defender's intern/volunteer program. The Bureau of Human Resources Report was issued on December 30, 2013. The Employment Plan was amended on July 23, 2015 to use Taleo for the Public Defender's intern/volunteer program. Postings for this program should be implemented soon and monitoring will begin during the next reporting period.

Please note that I have received one Request for Documents during this reporting period.

Interns/Externs:

Intern/Extern placements outside of general hiring process continue to be monitored. There have been 32 interns placed into positions at the County and, in each instance, the academic institution or non-political organization has submitted the No Political Consideration Certification and has been fully compliant with the process. The number of interns does not include interns who are part of the Internship or Volunteer Program at the Office of the Public Defender. The current process established in 2012 is working quite well.

Executive Assistant:

Two Executive Assistant I positions and four Executive Assistant II positions were filled in compliance with the Employment Plan during this reporting period.

Direct Appointments:

Six Direct Appointments were made during this reporting period and were compliant with the Plan.

Ineligible for Rehire List:

As stated in my last report, the Employment Plan was amended to include a section allowing the County to create an Ineligible for Rehire List. The list will include former employees who are deemed disqualified or ineligible for employment due to reasons listed in the Personnel Rules, a finding related to unlawful political discrimination and/or engagement of prohibited political activity. The Bureau of Human Resources is in the final stage of implementing the list and will update its website with a Revised Request for Documents that can be submitted to me for a copy of the list.

A Few Observations:

The structured interview process has been effective with occasional issues. In one instance, a panel member would not provide an interview form to the Bureau of Human Resources Analyst, explaining that he had to go to a meeting. I accompanied her to the remaining interviews and selection meeting. Everyone discussed the steps that must be followed and there were no further issues that occurred. The Bureau of Human Resources Analysts continue implementing the steps in the Plan by spotting issues, bringing them to my attention and rectifying them as soon as possible. I continue to have access to all Bureau of Human Resources files, data, reports, tracking spreadsheets, etc., and Departments continue to respond to all of my requests for information and documentation.

Conclusion:

The County has implemented the Employment Plan for three and one half years with a focus of obtaining substantial compliance. As always, I am grateful for the efforts of the President's Office, the entire Bureau of Human Resources staff, the Compliance Administrator's Office, the Office of the Independent Inspector General and the County Auditor in providing assistance in my monitoring activities.

Sincerely yours,



Letitia Dominici

cc: Laura Lechowicz Felicione, Special Assistant Legal, Office of the President
Martha Martinez, Interim Bureau Chief of Human Resources and Chief of the Bureau of Administration