



BUREAU OF HUMAN RESOURCES

**LETITIA DOMINICI**

COMPLIANCE OFFICER

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

**TONI PRECKWINKLE**

PRESIDENT

**Cook County Board  
of Commissioners**

EARLEAN COLLINS  
1st District

ROBERT 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

EDWIN REYES  
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

ELIZABETH ANN DOODY GORMAN  
17th District

March 14, 2014

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: March 2014 Semi-Annual Report**

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

This is the fourth 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. Moving towards substantial compliance for the Offices under the President has been my goal since the Employment Plan was filed. My daily priority has been to increase transparency and accountability in hiring and the elimination of political considerations from decision-making in all employment actions for non-exempt positions. This report will be posted on the County's website as required by the Employment Plan.

**2014 Amendments to the Employment Plan:**

There were several amendments to the Employment Plan in January 2014, a few of which I will highlight. First, Veteran's Preference allows eligible veterans the opportunity to interview for vacancies as long as they meet the minimum qualifications for the position, identify their veteran status on the application and attach a copy of their discharge papers to the online application. Second, Internal Preference is given to County employees, upon Departmental request, and applicants will not be subject to randomization, i.e., these employees will be interviewed for the position as long as they meet the minimum qualifications. Third, creation of an Ineligible for Rehire List is allowed in certain circumstances and a process to place former employees on the list is being developed.

**Supplemental Policies:**

The Supplemental Policies became effective August 1, 2013, and Department representatives were trained on these policies and related forms. The Supplemental Policies must be considered

when making employment-related decisions, in addition to the Employment Plan, Collective Bargaining Agreements and Personnel Rules. Departments were encouraged to contact the Bureau of Human Resources (BHR) or me for purposes of clarification, questions on implementation and use of the forms.

There have been three requests for Reclassification, one Interim Assignment, one Temporary Assignment, one Transfer and 27 Disciplinary Action forms sent to BHR and me. Departments need reminding when it comes to tracking the end dates for certain employment actions related to these Supplemental Policies; however, hopefully this issue will subside after Departments become more accustomed to using the forms. All related documentation and forms have been forwarded to the Compliance Administrator's Office and the Office of the Independent Inspector General and I will continue to monitor implementation of the Supplemental Policies.

**Training Status:**

The 2013 Annual Employment Plan Training was successful. All employees must take the online Employment Plan training and supervisors/interviewers are required to take an additional module in order to remain certified to conduct interviews. Online training began on May 17, 2013 and finished at year end. Approximately 1,895 employees were trained online and 566 employees who did not have computer access were trained in person. Related tools for Departmental use are available on the County intranet (CCNET). The current practice is that new employees and supervisors are trained face-to-face within 90 days of their start date and thereafter can participate in the online training.

During September 2013, the Independent Inspector General, Forest Preserve District's Director of Compliance and I scheduled six voluntary informational training sessions for the Cook County Board of Commissioners. The presentation highlighted various provisions of both Employment Plans presented to employees of the County and Forest Preserve District and reviewed employee and official reporting requirements.

**Postings on Cook County's Website:**

The BHR website link has consistently been updated to include amendments to the Employment Plan, Supplemental Policies, and the Exempt List containing the names of employees holding exempt positions and exempt job descriptions.\* The certification process for exempt hires that was established in 2012 is being followed to ensure that persons appointed to these positions meet the minimum qualifications.

**Application Tracking and Application System (a/k/a Taleo):**

The Taleo redesign has been completed. The redesign created enormous efficiencies in the hiring process, and readily provides information on the hiring sequence, which tremendously assists with monitoring and auditing responsibilities.

\*Employment Actions: The Bureau of Technology has been assisting with a new reporting mechanism for employment action reports for quite some time. On March 7, 2014, monthly employment action reports were sent to the Office of the Independent Inspector General and Compliance Administrator. The quarterly reports mandated by the Employment Plan should be posted on the County website within the next several weeks.

**Requests to Hire/Job Descriptions:**

BHR processed approximately 144 Request to Hire forms during the last six months, of which I reviewed 37. Additionally, I reviewed approximately 23 job descriptions. Departments have worked with BHR to develop minimum qualifications that are current and can be validated through Taleo. The Medical Examiner's Office has added minimum qualifications with certification requirements years beyond the hire date and assured me that these deadlines will be tracked. Several controls have been developed, including BHR tracking of the dates as well, which has alleviated my concerns with minimum requirements not being met at the time of hiring.

**Randomizations:**

During this monitoring period, 40 randomizations occurred without any substantive concerns. I did not monitor two of the randomizations. Recently, each BHR Analyst has been provided the software to randomize and has been trained to conduct the randomizations for the positions they are assigned to fill.

**Actively Recruited Positions:**

The Actively Recruited Position Hiring Process is an exception to general hiring and Departments have been creating interview lists with the additional feature of not randomizing candidates for these types of positions. Department Heads have the option of conducting second interviews. During this reporting period, I monitored six Application Review Panels from the Medical Examiner's Office, Department of Human Rights and Ethics and the Office of the Public Defender. The Public Defender's Office conducted second interviews and the remaining Departments chose not to exercise that option. A recent amendment in the Employment Plan requires that the Interview Panel Ranking form be used after the second interview to provide consistency with the process. There were a few issues with notice of interviews provided prior to the Application Panel Review Meeting which have been easily resolved. Otherwise, the process is working as all parties envisioned and it provides Departmental participation in the validation process.

**Validation of Candidates/Interview Lists:**

Since the last report, I have reviewed approximately 122 interview lists that the BHR staff generated after validating candidates. BHR staff has been doing an exceptional job with this task. Since the Supplemental Policies became effective on August 1, 2013, requiring that Disciplinary Action forms be sent to BHR, the step to ensure that those employees, including former employees, who were suspended within 12 months of the date of their application be removed from the eligibility list has improved.

"Dual" validation continues with assistance from the Bureau of Technology with validating technical minimum qualifications. BHR and the Bureau of Technology validated applicants on 18 occasions and one co-validation occurred with the HRIS Manager, which is a position in BHR. This step cannot occur without monitoring by William Frantz, Manager of Recruitment and Selections, or me.

**Recommendation Letters:**

Approximately 212 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. There were five letters that were non-compliant but not patronage recommendations. The vast majority of the recommendation letters continue to be sent for positions in the Office of the Public Defender. Recommendation letters are provided to the interview panel at the selection meeting.

#### **Interviews/Selection Meetings Monitored:**

I have monitored some or all interviews for 19 job postings and attended 10 selection meetings. During this reporting period, postings include notice that degrees awarded outside of the United States should be credentialed and this has alleviated issues that arose when a candidate brought a foreign degree to the interview. Candidates continue to arrive at interviews without required documentation, even though the posting provides notice of this requirement and Departments are encouraged to remind candidates to bring the required documentation when scheduling interviews. Departments have appropriately eliminated these candidates from consideration for the position.

BHR staff consistently brings items to my attention where the steps in the Employment Plan are being questioned. I continue to discuss these issues and email Departments with strong recommendations on the next steps to follow.

A unique request directed to me for my recommendation came from an exempt employee who wanted to interview for a non-exempt position. Discussions ensued with the Compliance Administrator's Office and I did not see any issues that would prohibit this employee from applying for a non-exempt position. I closely monitored the hiring process for the non-exempt position.

A selection meeting in the Office of the Chief Procurement Officer took place and the lead panel member conducted herself in the most unprofessional manner towards a fellow panel member. Since the Employment Plan specifically mandates that each panel member speak freely, I intervened to allow the panel member an opportunity to voice his concern regarding a candidate and how the candidate interviewed without interruption by the lead panel member. Subsequent interviews and a selection meeting were monitored and this type of conduct by this individual did not recur. Part of the issue was that a panel member did not know the answer to a technical question. Prior to the beginning of this selection meeting, a discussion took place regarding the importance of all panel members knowing the answer to each question and how scoring one question can affect the overall average score for a candidate. Moving forward BHR Analysts are aware that they should ask Departments whether panel members discussed or have been provided answers to the questions prior to interviewing.

#### **Complaints:**

Since the last report, three Employment Plan matters were investigated; two complaints were filed by employees and I initiated one investigation. Complaint # 13-006 was filed by a current employee who alleged that the position for which he interviewed would not be filled because it was removed from the budget and that he should have been promoted. The allegation was unfounded and the evidence supported the fact that the position was eliminated from the budget.

Complaint # 13-007 was opened to determine whether or not Section V.C.1., Prohibited Contacts, of the Employment

Plan was violated; however, the allegation was unfounded. The employee brought an application and resume to the President's Office, outside of the Taleo online application system, and was retrained on portions of the Employment Plan including a review of Prohibited Contacts, Permitted Contacts and the online application process utilizing Taleo.

Complaint # 13-008 involved a current employee who alleged that the general hiring steps were not followed because the minimum qualifications for a position substantively changed. The employee reapplied for the position when it was reposted but was not allowed to interview again because the employee had already interviewed for that position. The allegation was unfounded as the evidence did not support that there was anything intentionally done to sidestep the Employment Plan when the position was reposted. My investigation revealed that the minimum qualifications changed and my recommendation included reposting the position and developing interview questions to align with the minimum qualifications.

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 program. The BHR Report was issued on December 30, 2013. There have been discussions and proposals on the intern program but a resolution has not yet been finalized.

Please note that the mechanism for the public to request reports generated as a result of investigations is a Request for Documents. During this reporting period, I have not received a Request for Documents.

**Interns/Externs:**

Intern/Extern placements are funneled through the Compliance Office to ensure the steps are properly followed. As you are aware, these placements are not part of the general hiring process and are closely monitored. There have been 23 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 those interns who are part of the Internship Program at the Office of the Public Defender.

BHR staff and I formalized an Intern/Extern Request and Placement Process Packet that includes guidelines, a step-by-step chart, a form and sample intern/extern opportunity postings. During the next reporting period, the packet will be distributed to the Board of Commissioners and Departments to provide assistance with obtaining interns or externs.

An issue surfaced during Board of Commissioners' training last fall when the intern/extern portion of the Employment Plan was being explained. People volunteer at non-political events when additional help is needed as there are not enough staff members to assist with the events. For example, it was brought to our attention that there was an outdoor event where volunteers were needed to place worms on hooks. Other volunteers assist with sign-in sheets, handing out folders and setting up chairs. One-day or one-event volunteers are not addressed in the Employment Plan. I am working with the Office of the Independent Inspector General on a solution to address this need that is compliant with the Employment Plan.

**Executive Assistant:**

During this reporting period, there have been three Executive Assistant II positions filled in compliance with the Employment Plan.

**A Few Observations:**

Ten interview files were recently audited for purposes of following the general hiring steps and there were no issues found with any of these files.

There are occasional missteps that occur during the Employment Plan processes but they have been identified and reasonably resolved, which is indicative of the significant progress the County has made since the Employment Plan was filed.

As I have reported in the past, I continue to have access to all BHR files, including a large volume of computerized data, which assists with my monitoring responsibilities. Departments have cooperated with providing requested documentation.

**Conclusion:**

Overall, the steps in the Employment Plan are being followed as Departments are becoming more familiar with the required steps for general hiring and the Supplemental Policies. The County's commitment to transparency in employment actions affecting non-exempt positions continues to be a priority.

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 and the Office of the Independent Inspector General in providing assistance in my monitoring activities.

Sincerely yours,



Letitia Dominici

cc: Tasha Green Cruzat, Bureau of Human Resources  
Laura Lechowicz Felicione, Office of the President