



State of Illinois  
Department of Central Management Services

# CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT

Feb 1, 2023 – July 31, 2023



Compliance Office,  
Bureau of Personnel,  
Central Management Services

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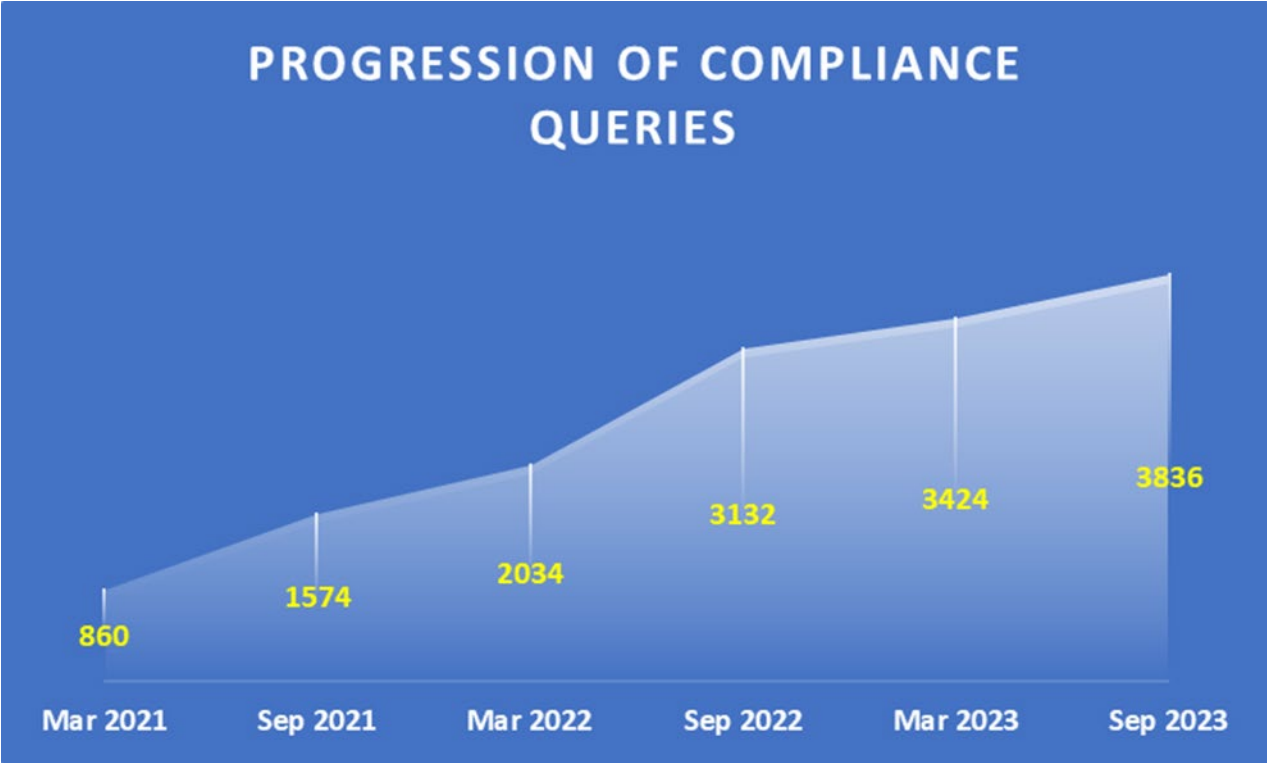
# Executive Summary

The growth in compliance requests over the past years demonstrates State Agencies are appropriately reviewing, and adhering to, the Comprehensive Employment Plan (CEP). For the six months preceding this semi-annual report, the CMS Personnel Compliance Office completed **3,836** compliance reviews from all intake sources for queries from State agencies, boards, and commissions. This is a new record high (see chart below) and does not count the numerous times that agencies reach out to the team via phone to ask questions and receive guidance.

The implementation of the Compliance SharePoint page was the largest change over the time of this report. As outlined in the March 2023 Semi-Annual Report, the primary intake method for Compliance queries changed from email to an online system. The SharePoint page has allowed for a more uniform query format and automated metrics and charts. The SharePoint site launched February 1, 2023 and has been very successful. We have continued to receive feedback, positive and constructive, and incorporate recommended changes to increase the functionality of the site. Most recently, we added the capability for agencies to enter multiple queries of the same type with less effort.

Another indicator that agencies are adhering to the compliance rules is that no material findings came from Employment Hiring Errors. These errors **decreased by nearly 17%** from the previous report period. The Compliance team uses this data to determine potential needs for additional trainings for specific agencies on specific areas of need.

For Political Discrimination, the trend from past reports continues – it does not exist. Political Contacts decreased by 33% (from 6 to 4) and consistently had no material impact to a hiring sequence.





# Personnel Compliance Strategy Activities

- **Improve the timeliness, efficiency, and quality of the hiring process (CMS)**
  - Maintain the responsiveness standard of no more than 2 days to provide a full Compliance response to queries.
- **Assess, Develop and Deliver Compliance Training for Agencies, Boards, and Commissions**
  - Completed 6 customer service visits to agencies (ISP, CDB, DoIT, IEMA, CMS, DVA) to get to know our customers and provide additional training. Used data and trends to select training topics.
  - The Chief Compliance Officer (CCO) personally communicated with HR Directors and other senior HR staff, nearly daily, to provide coaching on Compliance issues.
- **Improve Workplace Culture towards Continuous Improvement and Respect**
  - Maintain a “Speak Up” culture in Compliance that is respectful of opinions and adds to compliance process improvements. An example of this is, during bypass request discussions, assigning a team member to “champion” the candidate’s position.
- **Utilize Modern Data Practices to Improve Program Evaluation**
  - Implemented state-wide use of a SharePoint site as the primary intake method for Compliance Queries. This allows for instant updates on Compliance trends by utilizing the reports available.
- **Improve Customer Value and Reduce Waste**
  - Eliminated compliance approval situations due to data showing a lack of a trend or the existence of redundant checks with sections of the Bureau of Personnel (BoP).



# Compliance Office – Training

Compliance Office, along with personnel from the Division of Transactions, Records BW Claims and the Division of Career Services and Hiring Resources, conducted in-person visits to 6 State Agencies to develop positive customer relations, answer all questions and concerns, as well as to further understanding of the CEP, other governing documents, and the hiring process.

Through analysis of compliance data to include increases in denial rates, tracking the arrival of new key leaders, and large HR Staff turnovers, the Compliance Office completed a focused training program to educate State employees on the principles in the CEP and to equip them with the necessary tools for consistent and transparent operation of the State’s personnel functions.

## Agency In-Person Training

- March 1, 2023 – Illinois State Police
- March 30, 2023 – Capital Development Board
- April 4, 2023 – Dept. of Innovation & Technology
- April 25, 2023 – Emergency Management Agency and Office of Homeland Security
- June 14, 2023 – Central Management Services
- June 22, 2023 – Department of Veterans Affairs

## Compliance Training Projects Complete

- Contributed input for the Hiring Process Training Manual Version
- Internal Compliance Team training on Personal Services Contracts, Exempt position establishments, the Compliance SharePoint site, how to plan and conduct an in-person training with an agency, and several CEP processes.



# Compliance Reports

**Quarterly PSC Report** – a listing of all PSCs for all agencies, whether under the jurisdiction of the Governor or not, in the quarter.

**Quarterly PSC Audit** – results of the audit made on a sample of PSCs selected from the quarterly report.

**Quarterly Temporary Assignments (TA) Report** – a listing of all TAs that exceed 60 days.

**Quarterly Temporary Assignments Audit Report** - results of the audit of a sample of TAs, focusing on those that have lasted more than 120 days, to ensure that a valid justification supports the TA.

**Quarterly Interim Assignments (IA) Report** – a listing of all IAs that exceed 60 days.,

**Quarterly Interim Assignments Audit Report** - results of the audit of a sample of IAs, focusing on those that have lasted more than 120 days – to ensure that a valid justification supports the IA.

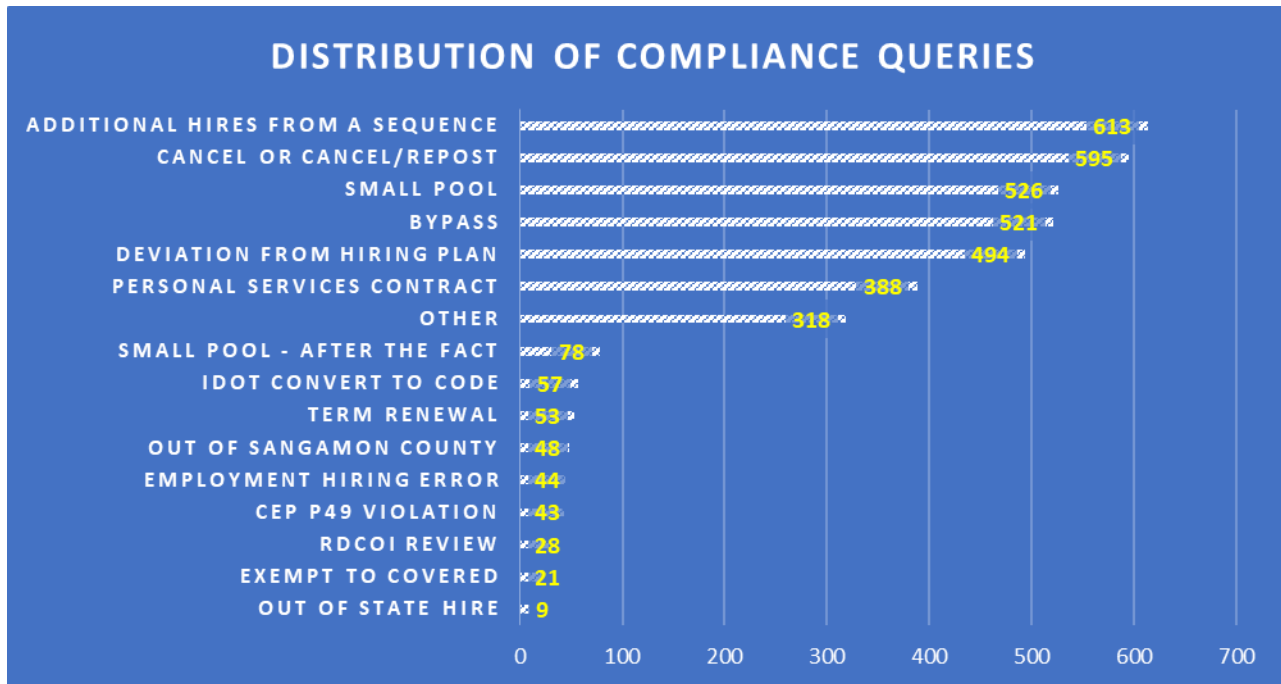
**Quarterly Report to OEIG HEM** – a listing of all deviations from pre- established hiring plans, potential conflicts of interest forwarded to the Compliance Office from Agency Personnel Officers, and all reviews of hiring sequences for non-Exempt positions where the selected candidate was employed in an Exempt Position immediately prior to being selected.

**Semi-Annual Compliance Report** – a publicly posted report that details the activities of the Personnel Compliance office.

We have completed the quarterly reports since early 2021 with no significant material findings.

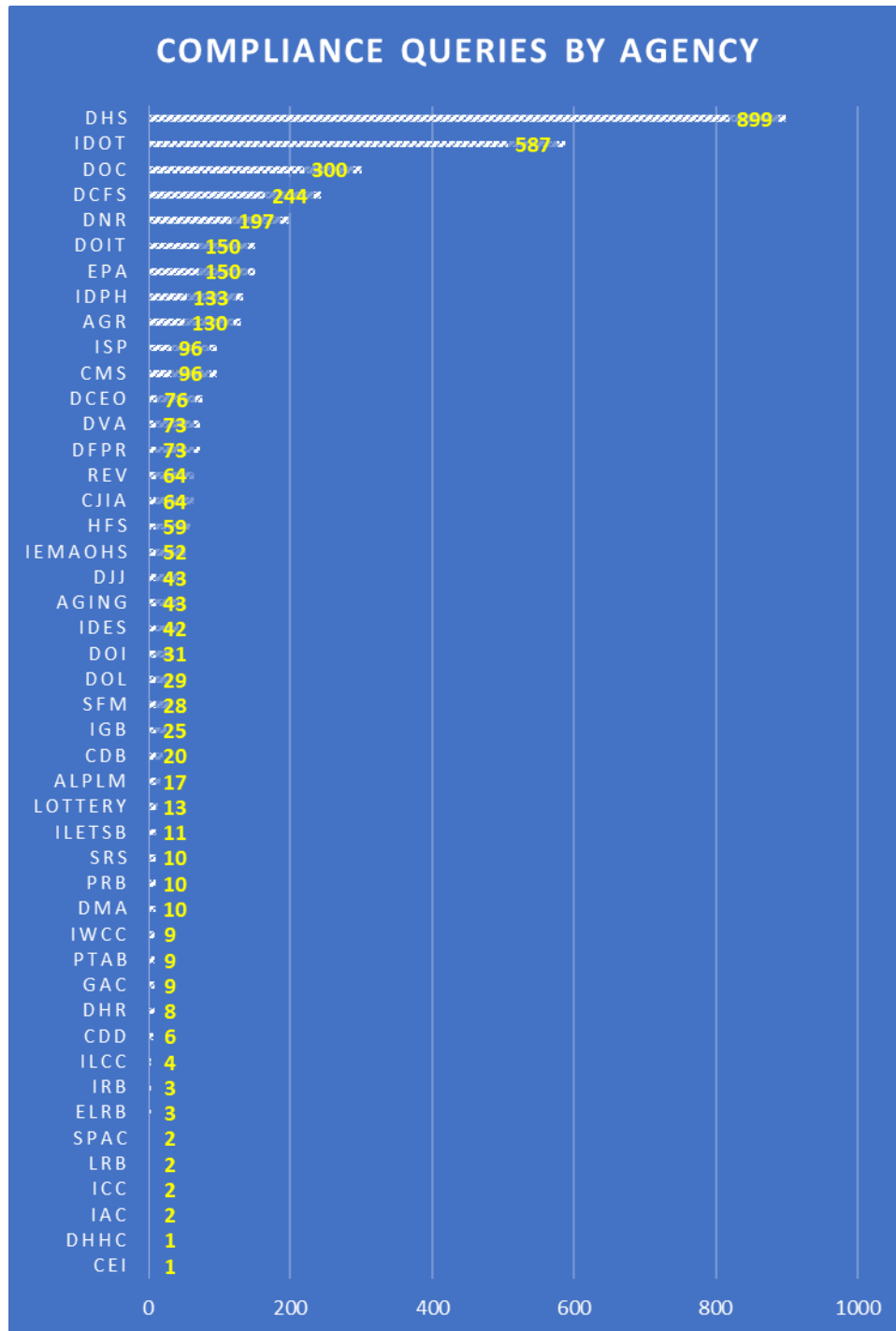


# Compliance Review Audit Activity



The chart shows the categories that comprise the bulk of Compliance work. The top 7 categories account for 3,455 queries, 90% of the total. For this report, additional hires from a sequence are reported separately from deviations from the hiring plan since they comprised greater than 50% of the total. Also, 290 of these additional hires come from DHS requesting to make additional hires from existing candidate pools in order to fill vacancies from existing headcount. Compliance saw increases in nearly every category, with some seeing increases of >100 (cancel or cancel & repost, small pool, bypass, PSCs). The number of queries in the “Other” category saw a large increase from 251 to 318, demonstrating the continued communication between agencies and Compliance to achieve workable, compliant solutions. With changes in law or procedure over the last 6 months, this will be the last report showing numbers for Out of Sangamon County requests and Out of State requests. Although the numbers are much lower, several of these categories demand considerable time for each query since they require a full review of the hiring sequence (small pool after the fact, convert to code, employment hiring error, CEP P49 violation, and Exempt to covered). Overall, bypass queries are the most time consuming. We take extra time to ensure the correct response is provided in accordance with applicable laws, governing documents, and policies. Bypass requests are carefully reviewed and researched before making a decision. We frequently confer with our partners in CMS Labor and CMS Personnel Legal, along with back and forth communication with the requesting agency.

# Compliance Review Audit Activity



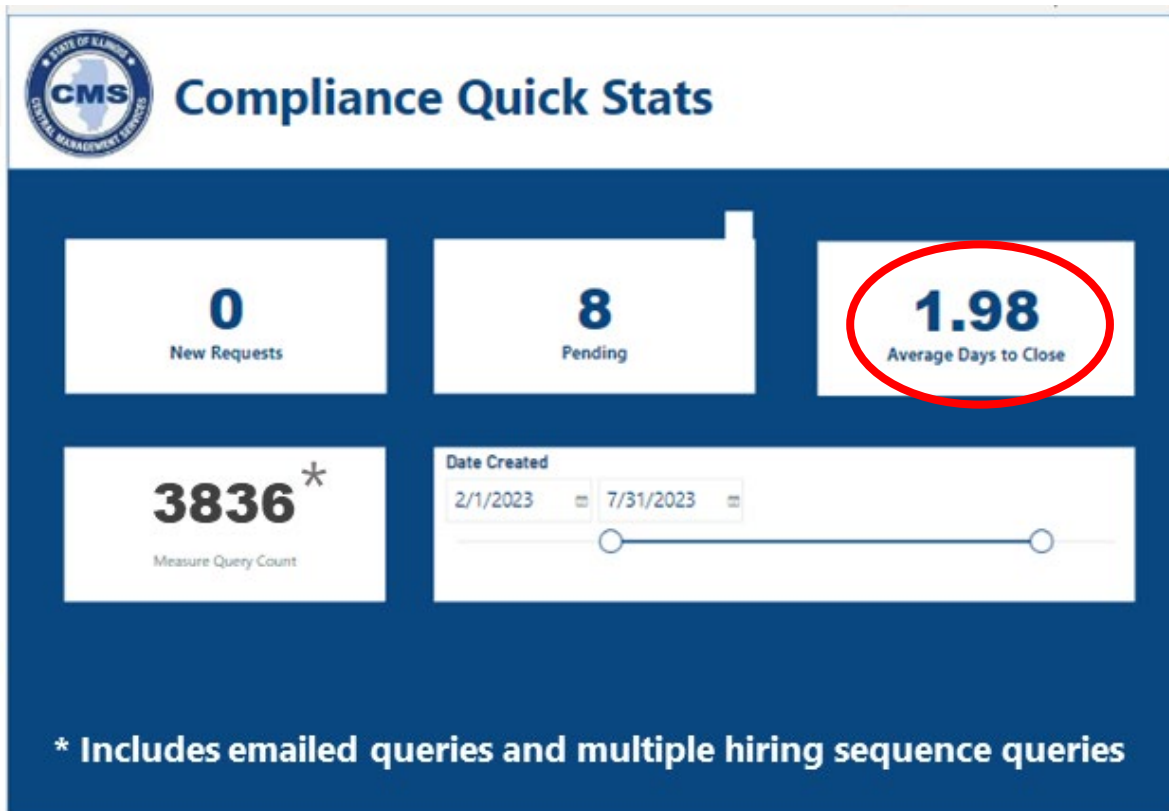
DHS remains our largest customer accounting for 23.4% of Compliance activity. The top four agencies submitted 53% (2,030) of the Compliance queries, with DOT at 15.3%, DOC - 7.8%, and DCFS - 6.4%. The remaining 47% (1,806) came from 42 organizations, including some non-code entities.



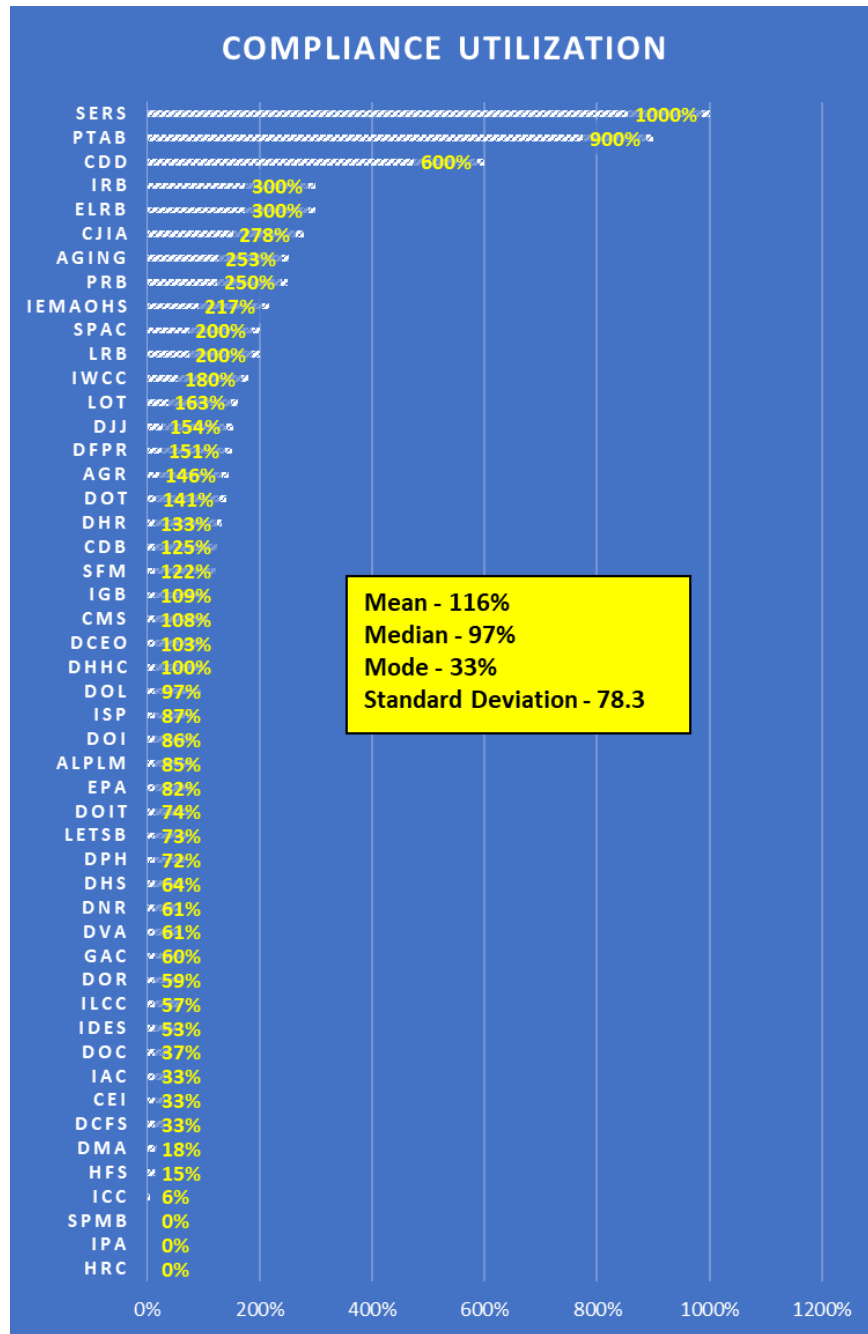
# Compliance Review Audit Activity

## Compliance Response Time

Outstanding customer service has always been a goal for the Compliance Team and is a large part of our reputation. The Compliance Office works efficiently and effectively to deliver timely, accurate, and actionable replies to organizations. The goal is to provide a same day response, or at the latest, the next day. Responses can take longer than our standard when referrals from outside of Compliance are needed, there is a need to gather more data from agencies, or having multiple Compliance Officers analyze a complex situation. For this reporting period compliance had an average response time of 1.98 calendar days, while overall queries increased from the previous report, and the team was missing a Compliance Officer. The average days to close is a new metric made possible by the switch to SharePoint as the primary intake method. The Compliance Office will continue to offer excellent customer service by providing accurate and timely responses to agency queries.

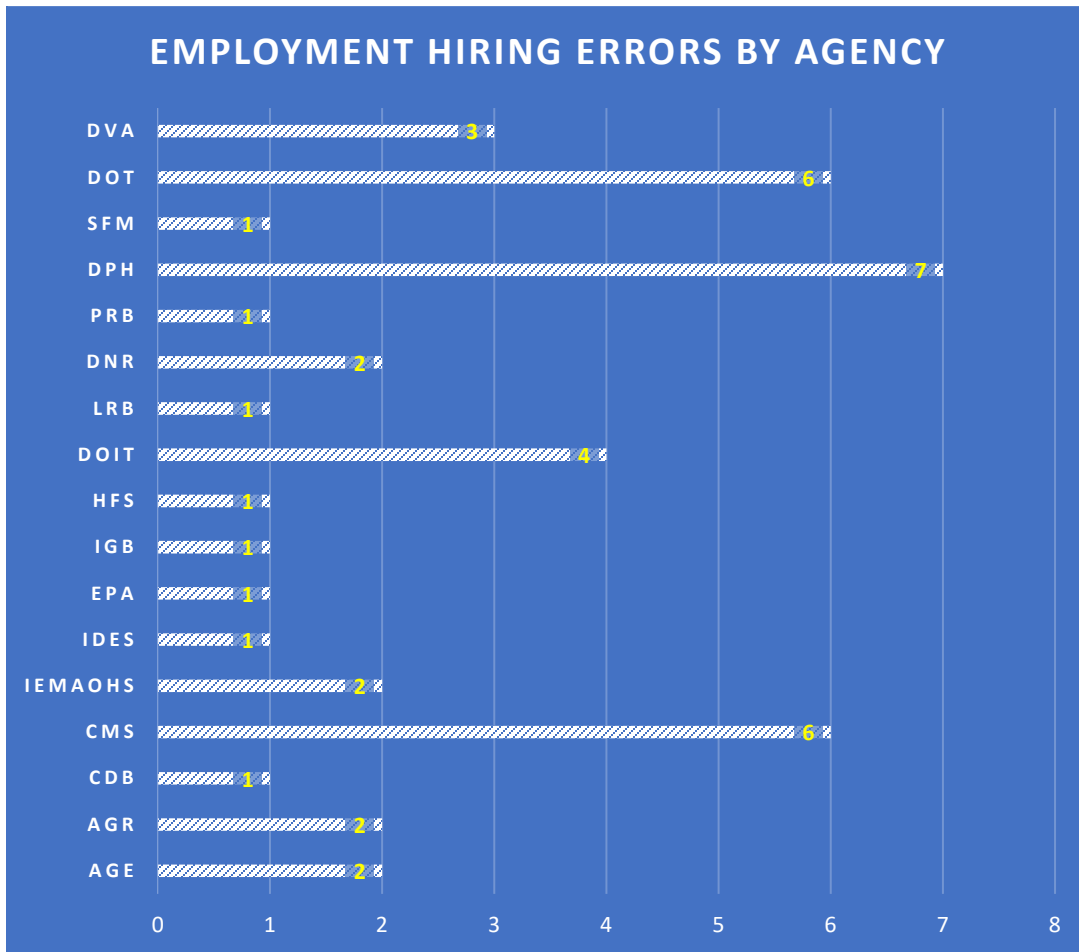


# Compliance Review Audit Activity



This metric is derived from total number of requisitions/the total number of compliance queries and is used to assist with targeting additional training. For example, ISP, who we visited early in this reporting period, went from a 40% utilization rate on the past report to 87%. By deleting the top and bottom 3 numbers from the total, the average is 116%. When looking at the Top 4 agencies with the most hiring sequences (DHS, DOT, DOC, DCFS) the average Compliance Utilization is 68.75%. The Compliance team uses data like this, and other data, to determine topics and agencies to target for training.

# Compliance Review Audit Activity



Personnel Compliance worked to resolve 42 Employment Hiring Errors. The chart above shows the distribution of those errors by agency. Reported separately, we also had 78 instances of Small Pool - after the fact and 43 CEP paragraph 49 violations (no pre-offer approval). The total from the previous report decreased (192 vs 163). Compliance reviews were conducted on all with no material findings.

# Political Discrimination

Instances of political discrimination, or allegations thereof, are also required to be reported on a semi-annual basis. The CEP provides a comprehensive definition of political discrimination.

*Any positive or negative employment action based on Political Reasons or Factors involving an Applicant, Candidate or State employee applying for, being considered for or holding a non-exempt position.*

There were no reports of Political Discrimination during this report period. This is one of the facts that speaks to the stability of the State's, and by extension, the Governor's reform measures.





# Political Contacts

CMS also provides notice of reports of political contacts. The CEP provides a detailed definition of political contacts required to be reported.

*Any contact, whether in person, in writing, by telephone, by facsimile, by e-mail, or any other means from any elected or appointed official of any political party or any agent acting on behalf of an elected or appointed official or political party, attempting to affect any hiring or employment action for any Non-Exempt Position. Any unsolicited contact (i.e. contact not solicited by the agency to verify employment or check references) related to a Non-Exempt Position directed to any personnel involved in an employment action is considered a Political Contact.*

During this reporting period, CMS Personnel Compliance received 4 reports of political contacts via the Political Contact SharePoint page.

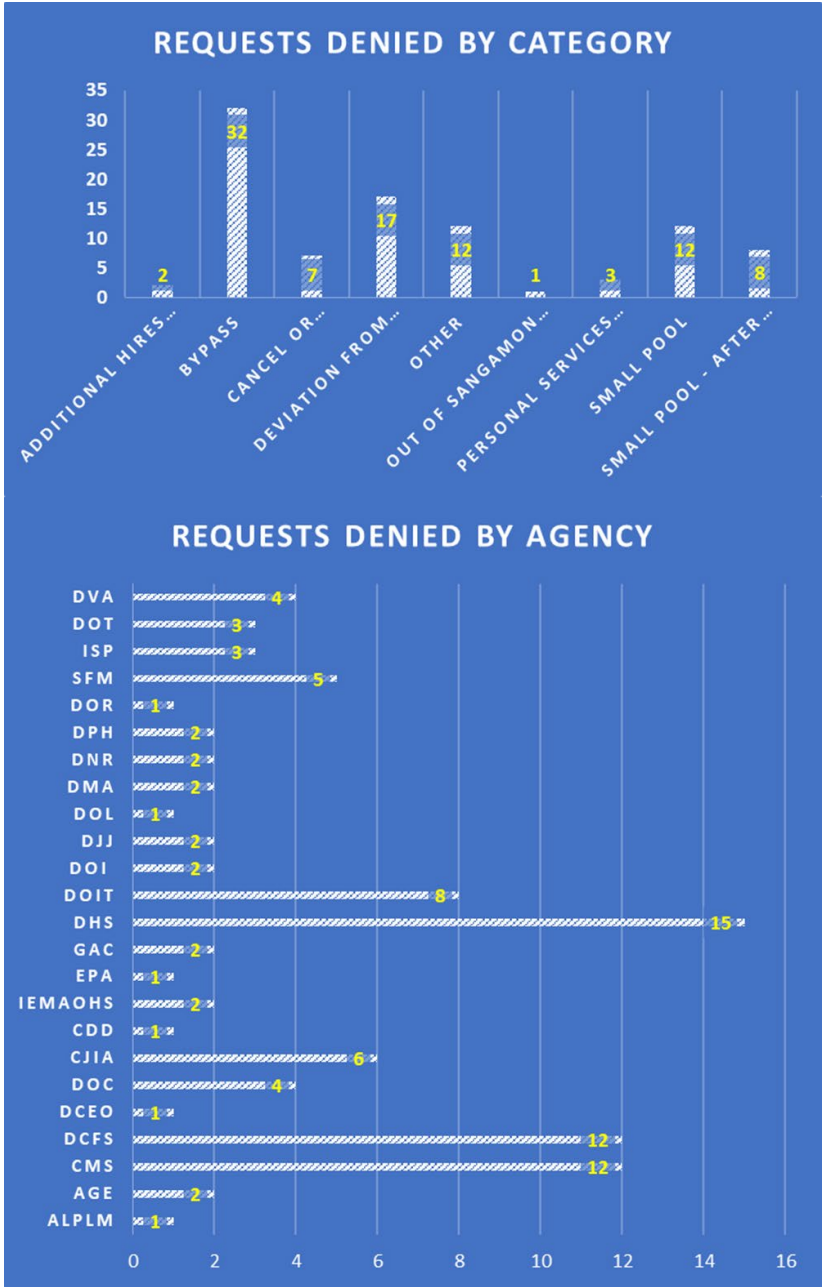
DOT – 1 | CMS – 1 | DHS - 2

1. A staff employee for a Senator contacted DOT about the Veteran hiring preference.
2. A staff member for a Representative emailed CMS about a constituent's issue on a job application. The staff member stated that the applicant needed to have an A to get the points to have an interview and asked CMS to check on the issues.
3. An applicant for a DHS position stated on an application that they had worked on a political campaign in the mid-1990s.
4. An applicant for a DHS position stated on a resume that they had been recommended by a US Senator and submitted for political appointment positions by two US Presidents. These actions were alleged to have occurred in the 1970s and 1980s.

Review of these hiring sequences did not reveal evidence that the contacts had any impact on the outcome of the hiring decision.

# Remedial and Corrective Actions

The Personnel Compliance Office worked with agencies to reach compliant solutions to the hiring challenges they face 97.5% of the time. The partnership between the agencies and Compliance throughout the last six months resulted in Compliance denying an agency request 94 times, or 2.5%, of the 3,836 total queries. Denied bypasses accounted for 34% of all denials. Denials are part of the targeting process for identifying additional training opportunities. The Compliance Team uses these queries to teach and train on the Comprehensive Employment Plan.



# Resources and Contacts

For questions about this report, please contact the Acting Chief Compliance Officer Shawn Wilson.

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Compliance requests can be directed to

[CMS.PersonnelCompliance@Illinois.gov](mailto:CMS.PersonnelCompliance@Illinois.gov)

Reports of Political Contacts or Political Discrimination should be submitted at:

<https://ilgov.sharepoint.com/sites/CMSPoliticalContactReporting>

This report will be made publicly available at

<https://www2.illinois.gov/cms/About/Reports/Pages/default.aspx>