State of Illinois
Department of Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT

February 1, 2024 – June 30, 2024

Compliance Office
Bureau of Personnel
Central Management Services

Table of Contents

Executive Summary

The growth in compliance requests over the past years indicates that State Agencies are diligently reviewing and adhering to the Comprehensive Employment Plan (CEP) revised in 2021. For the five months preceding this semi-annual report, the CMS Personnel Compliance Office completed:

- **2581 compliance reviews** in the Compliance SharePoint (SP).
- **188 additional requests** from multiple forms sent via SP or email.

This totals **2769 requests**, a decrease from the prior reporting period, covering all intake sources from State agencies, boards, and commissions. This figure does not include numerous phone and instant messaging inquiries for guidance. To better account for these interactions, we have instituted a guidance-only option for the next reporting period.

Reporting Period Adjustment

The drop in request volume is primarily due to the shift to a calendar year semi-annual reporting period, with this report covering five months instead of the usual six. Additionally, this report does not include January or July, which tend to be very heavy after the renewal date for Personnel Services Contract (PSC) renewals. To mitigate this issue, we plan to send reminders out about two months earlier to encourage submission ahead of due dates, thereby preventing the need to stop a contractor from working while late approvals are processed.

Another driving factor in the decreased monthly volume of requests for this reporting period were the myriad of end-user technical difficulties related to the new SAP Employee Central (EC) implementation and "go-live." Furthermore, when comparing the average monthly requests, there is a noticeable downward trend, which supports our goal of reducing undue approval request burdens on agencies.

Compliance SharePoint Site

Launched in February 2023 and upgraded in June 2024, the Compliance SharePoint site has been our primary intake method for compliance queries. Continuous feedback has led to improvements in functionality, such as allowing agencies to enter multiple queries of the same type with less effort. Starting 7/1/24, agencies are required to fully utilize the site's capabilities, which will enhance just-in-time reporting and personalized agency specific communication during site visits.

Bureau of Personnel

Compliance Division

Select Query Type:

- ◯ Additional hires from a sequence
- ◯ Bypass
- ◯ Cancel or Cancel/Repost
- ◯ CEP P49 Violation
- ◯ Deviation from Hiring Plan
- ◯ Employment Hiring Error
- ◯ Exempt to Covered
- ◯ Guidance Only
- ◯ IDOT convert to Code
- ◯ Out of State hire
- ◯ Personal Services Contract
- ◯ RDCOI Review
- ◯ Small Pool
- ◯ Small Pool - after the fact
- ◯ Other

Performance Indicators

- **Decrease in Employment Hiring Errors**: No material findings from Employment Hiring Errors were reported, with errors decreasing from 4% to 1% between reporting periods. This 1% accounts for a total of 23 hiring errors involving only five agencies, demonstrating the effectiveness of our guidance. The Compliance team uses this data to identify areas for additional training for specific agencies.
- **Political Discrimination**: The trend of no political discrimination continues. Although Political Contact reports decreased by 40% (from five to two), they have had no material impact on hiring sequences.

Graphical Representation

The graph on the next page illustrates the progression of compliance requests since the compliance department's inception in 2019. Overall, these trends highlight the effectiveness of the CMS Personnel Compliance Office in supporting agencies' adherence to compliance rules and improving the efficiency and quality of the hiring process.

PROGRESSION OF COMPLIANCE QUERIES

860	1574	2034	3122	3424	3836	3867	2769
Mar 2021	Sep 2021	Mar 2022	Sep 2022	Mar 2023	Sep 2023	Mar 2024	Jun 2024
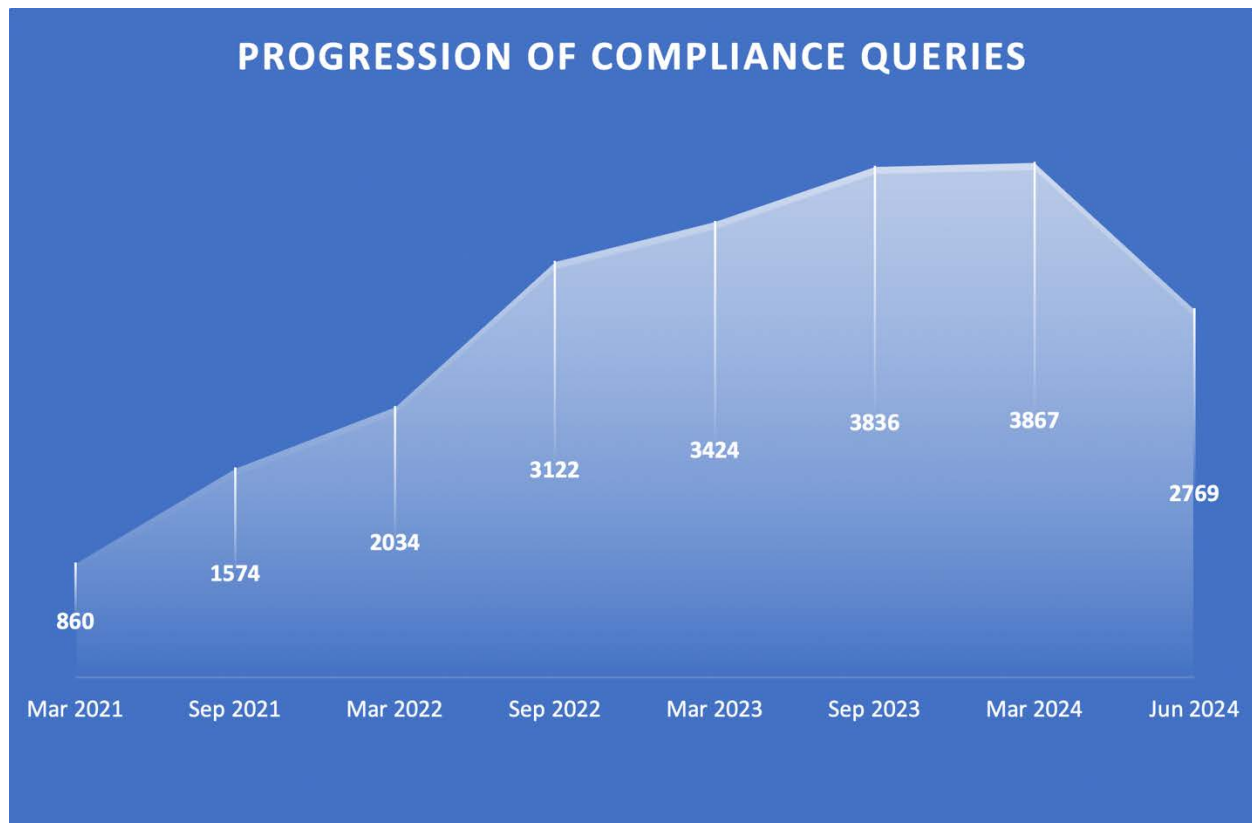
Personnel Compliance Strategy Activities

Improve the timeliness, efficiency, and quality of the hiring process (CMS)

> **Maintain a Responsiveness Standard**: We aim to respond to compliance queries within two (2) days, providing full compliance feedback and approval determinations. Although we strive to meet this goal, certain complex requests may necessitate consultation with internal CMS business partners, which could extend the response time beyond two days.

Assess, Develop and Deliver Compliance Training for Agencies, Boards, and Commissions

- **Daily Communication and Coaching**: The Chief Compliance Officer (CCO) and Compliance Officers (COs) regularly engage with HR Directors and senior HR staff, offering daily coaching on compliance issues.
- **Consistent Guidance**: Compliance Officers maintain regular communication with agency HR staff and CMS BoP staff, providing insights and guidance on compliance matters.
- **Dedicated Training Development**: The CMS training team has assigned a lead to develop up-to-date training modules for various request queries submitted by agencies.

Improve Workplace Culture towards Continuous Improvement and Respect

- **Foster a "Speak Up" Culture**: Encourage a respectful environment where team members can express their opinions and contribute to compliance process improvements. For instance, during bypass request discussions, a team member may advocate for the candidate's position.
- **Respectful Collaboration**: Always treat agency representatives with respect during compliance approval requests and throughout the collaborative process.

Utilize Modern Data Practices to Improve Program Evaluation

- **SharePoint for Compliance Queries**: We have implemented a state-wide SharePoint site as the primary intake method for compliance queries, allowing for instant updates on compliance trends through available reports. Starting 7/1/24, this will be the only method for compliance query intake.
- **Political Contacts System**: A separate SharePoint system for political contacts is in place, offering similar capabilities for trend analysis.

Improve Customer Value and Reduce Waste

- **Eliminate Redundant Checks**: We have removed compliance approval situations where data indicated a lack of trend or the existence of redundant checks within the Bureau of Personnel (BoP).
- **Ongoing Process Review**: We are currently zero-basing all requests to assess the value of continuing them, ensuring an ongoing process of improvement.

Vision | Goal | Strategy | Action | Success

Compliance Review Audit Activity

Distribution of Compliance Queries

The chart below shows the categories that comprise the bulk of Compliance work. The top seven (7) categories account for 93% of the total requests. For this report, additional hires from a sequence are reported separately from deviations from the hiring plan, as they accounted for more than 50% of the total deviations. Notably, 356 of these additional hires were from DHS, which requested to fill vacancies from existing headcount using current candidate pools. We observed increases in numerous categories, with some seeing increases of over 100 queries (e.g., bypass and deviation to hiring plan).

Query Volume by Category

"Other" Category:
The number of queries in this category decreased from 267 to 203, likely influenced by several factors mentioned in the executive summary above. Nonetheless, this decrease also reflects ongoing communication between agencies and Compliance to achieve workable, compliant solutions.

Exclusions from Reporting:

- **Out of Sangamon County Requests:** No longer reported due to recent changes in law or procedure.
- **Term Renewals:** These no longer require prior Compliance approval but were closed out as "other" while advising agencies not to submit these in the future.

Time-Consuming Categories
Several categories, although lower in numbers, demand considerable time for each query due to the need for a full review of the hiring sequence. These include:

- **Small Pool After the Fact**
- **Convert to Code**
- **Employment Hiring Error**
- **CEP P49 Violation**
- **Exempt to Covered**

Bypass Queries

Bypass queries are the most time-consuming, requiring careful review and research to ensure compliance with applicable laws, governing documents, and policies. We frequently confer with our partners in CMS Labor Relations and CMS Personnel Legal and engage in extensive communication with the requesting agency to provide accurate responses.

Graphical Representation

The graph below illustrates the distribution of compliance queries by category, highlighting the predominance of the top seven categories and the time-intensive nature of certain query types:

Distribution of Compliance Queries
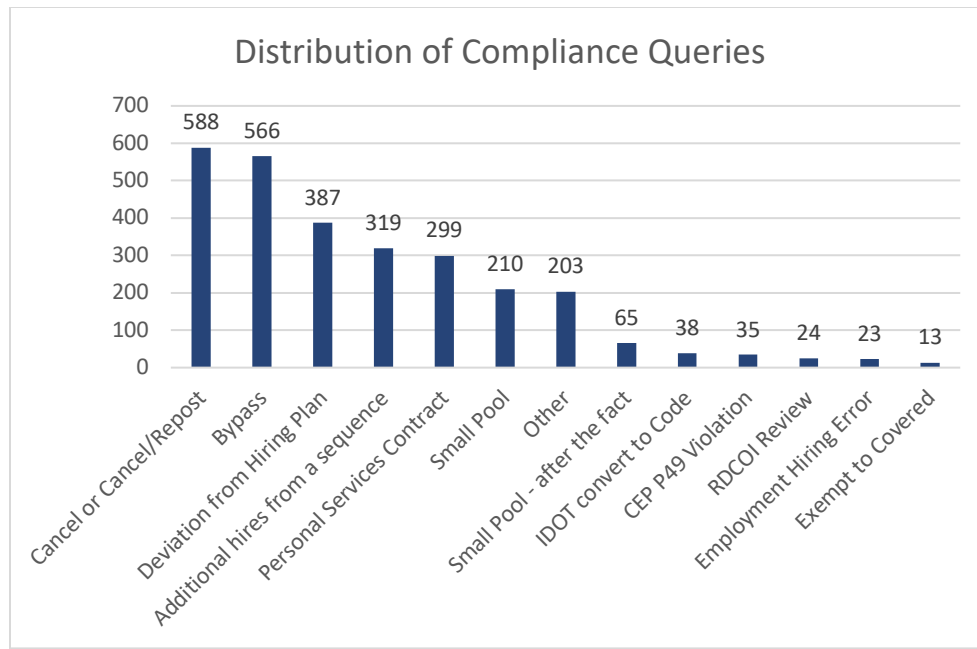
Five queries are removed from this graph because they were Term Renewals that were submitted but they were closed due to no compliance decision was required. Overall, the compliance office continues to efficiently manage and respond to a diverse range of queries, ensuring adherence to compliance standards while supporting agency needs.

Agency Breakdown of Compliance Activity

DHS remains our largest customer, accounting for 18% of all compliance activity. The top four agencies—DHS, DOC, DOT, and DCFS—collectively submitted 50% of all compliance requests. The breakdown is as follows:

- **DHS (Department of Human Services):** 18%
- **DOC (Department of Corrections):** 14.2%
- **DOT (Department of Transportation):** 11%
- **DCFS (Department of Children and Family Services):** 6.8%

The remaining 50% of compliance requests came from 44 other organizations, including some non-code entities.
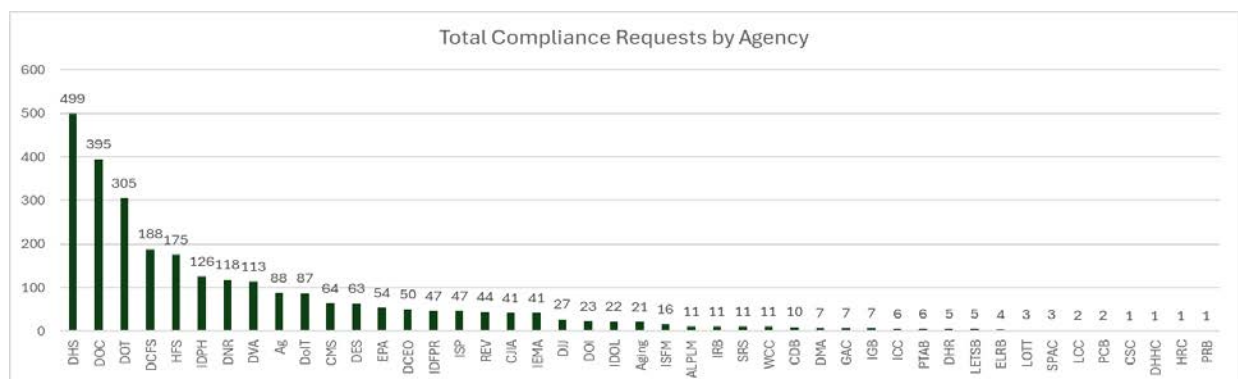
Outstanding Customer Service and Response Times

Outstanding customer service is a cornerstone of the Compliance Team's reputation. The Compliance Office is committed to working efficiently and effectively to deliver timely, accurate, and actionable replies to organizations. Our goal is to provide a same-day response or, at the latest, a next-day response.

Factors Affecting Response Times
Responses can sometimes take longer than our standard due to:

- Referrals to external departments outside of Compliance, such as CMS Legal or Labor
- The need to gather additional data from agencies or business partners
- Involvement of multiple Compliance Officers to analyze complex situations
- Decreases in staffing levels

Performance Metrics for the Reporting Period
For this reporting period:

- **Average Response Time**: 3.02 calendar days, up from 2.26 days in the previous reporting period. Over 50% of the 46 agencies who sent in requests had a response time of 2.96 to 1.0 days.
- **Overall** Queries: Decreased from the previous report
- **Staffing Levels**: Decreased due to a Compliance Officer being Interim Assigned to the vacant CCO position until the last six weeks of this reporting period
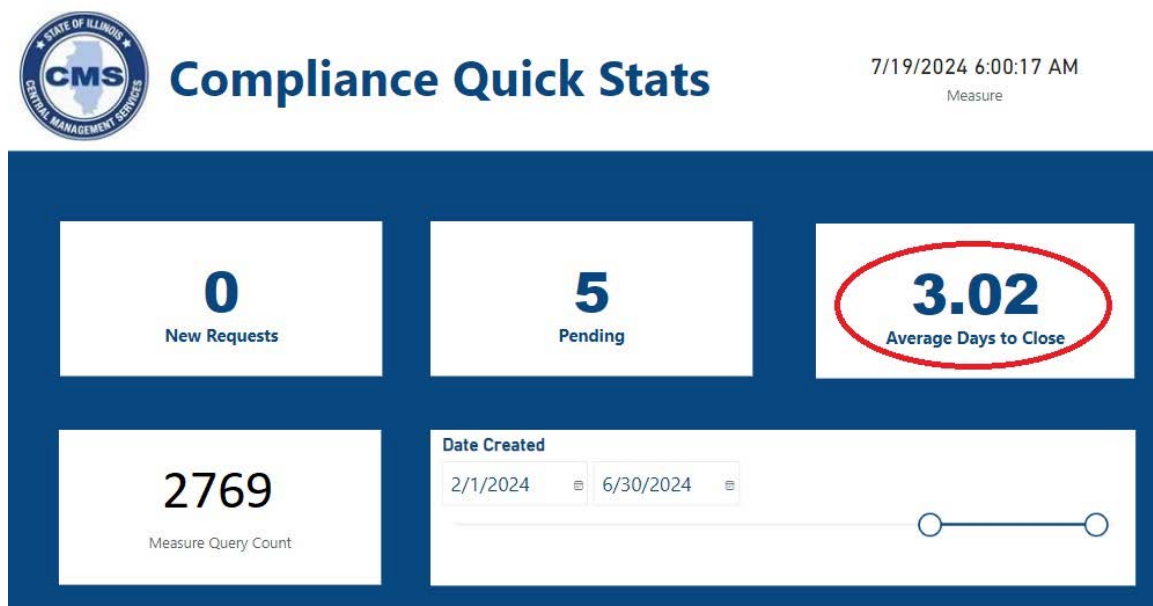
Despite these challenges, the Compliance Team continues to prioritize outstanding customer service and strives to maintain efficient and effective operations to meet the needs of our stakeholders.

Compliance Utilization Percentage - Total Queries/Total Requisitions

Agency	Percentage
PCB	11%
SRS	13%
PRB	13%
IGB	14%
DMA	19%
IDFPR	20%
ILCC	22%
REV	38%
DCFS	42%
ILETSB	44%
DOIT	46%
IDES	47%
DNR	47%
DHS	48%
DJJ	49%
EPA	50%
LOTT	60%
DHR	60%
IDOL	61%
AG	63%
AGING	64%
DOC	72%
DOI	76%
SFM	76%
CMS	83%
DCEO	90%
IDPH	97%
IDOT	97%
CJIA	100%
ISP	103%
HFS	110%
ALPLM	122%
DVA	127%
CDB	133%
IRB	140%
IEMA	167%
PTAB	200%
ICC	200%
GAC	300%
IWCC	900%

Requisitions vs. Compliance Queries Utilization

To evaluate job sequence related compliance utilization as it relates to job requestions, all query requests related to PSC approval work were removed. The following chart compares the total number of job requisitions to the total number of queries submitted related to job requisitions:

Personal Services Contracts

It is important to break out compliance work that is done on Personal Services Contracts (PSC) which accounts for a good majority of our work especially in December, January, June, and July around the semi-annual renewal dates of January and July 1st each year. During this reporting period there were a total of 300 PSC new or renewal approval requests sent to CMS Compliance from 36 different agencies.

Compliance Utilization Rates

- Average Overall Compliance Utilization: 90%
- Average Utilization of Top four Agencies to submit compliance requests (DHS, DOC, IDOT, DCFS): 66%

Analysis and Application

The Compliance team uses this and other data to determine targeted training topics for agencies. The higher utilization rate among agencies indicates areas where focused training could enhance efficiency and compliance adherence. A lower utilization rate indicates that we answered fewer questions per inquiry indicating little to no training is necessary.

Summary

By analyzing requisition and query data, the Compliance team can:

- Identify trends and patterns in compliance activity
- Pinpoint areas where agencies might benefit from additional training
- Enhance overall compliance processes and support to ensure effective and efficient operations across all agencies.

Employment Hiring Errors by Agency

During the reporting period, the Personnel Compliance team worked to resolve 23 Employment Hiring Errors, an increase from 14 in the previous period. The chart above shows the distribution of these errors by agency.

Employment Error Definitions:
Below is a list and definition of each employment error based on the resource sourced:

Error Type	Definition
CEP 29	Incorrect posting period
CEP 33	Small pool request submitted late
CEP 35	Relationship Disclosure and Conflict of Interest forms completed late
CEP 36	Interviewer not certified
CEP 41	Cancellation not requested
CEP 49	No pre-offer approval
Personnel Code sect. 8b.7	Veterans' preference violation
Executive Order 18-12	Failed to offer to eligible out of state candidate

Distribution of Employment Hiring Errors
The 23 hiring errors came from five different agencies with DCFS having the most at nine. Compliance found seven for DPH with DVA and DHS tying for third place with three each. Finally, CMS had one error.

Other Key Compliance Issues
- **Small Pool After the Fact:** There were 65 instances, down from 106 in the previous reporting period.
- **CEP Paragraph 49 Violations (No Pre-Offer Approval):** We handled 35 cases.

Review and Findings

- All instances were thoroughly reviewed, and no material findings were reported.

Summary

- **Employment Hiring Errors:** Increased to 23 from 14.
- **Small Pool Instances:** Decreased to 65 from 106.
- **CEP P49 Violations:** 35 cases reviewed with no material findings.

The data indicates a need for continuous monitoring and targeted training to address specific areas where errors and issues persist. The chart above provides a visual representation of the distribution of these errors by agency, aiding in pinpointing where focused efforts may be necessary.

Remedial and Corrective Actions

The Personnel Compliance Office collaborates closely with agencies to resolve hiring challenges, achieving compliant solutions 98.8% of the time.

Requests Denied by Category

Denied Bypasses: Accounted for 41.18% of all denials.
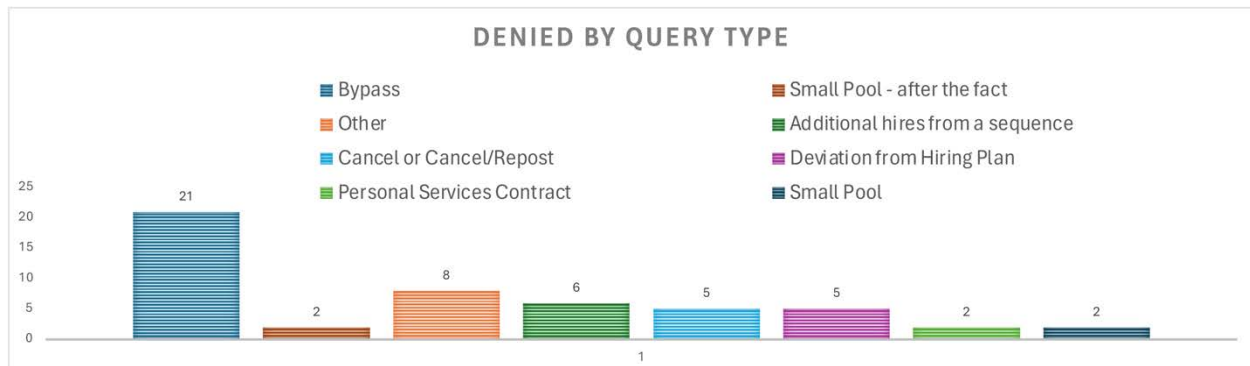
Requests Denied by Agency

The Compliance Office denied agency requests 51 times, representing 1.84% of the 2776 total queries. This demonstrates a strong partnership between the agencies and Compliance, with most queries being resolved successfully.

Denials By Agency

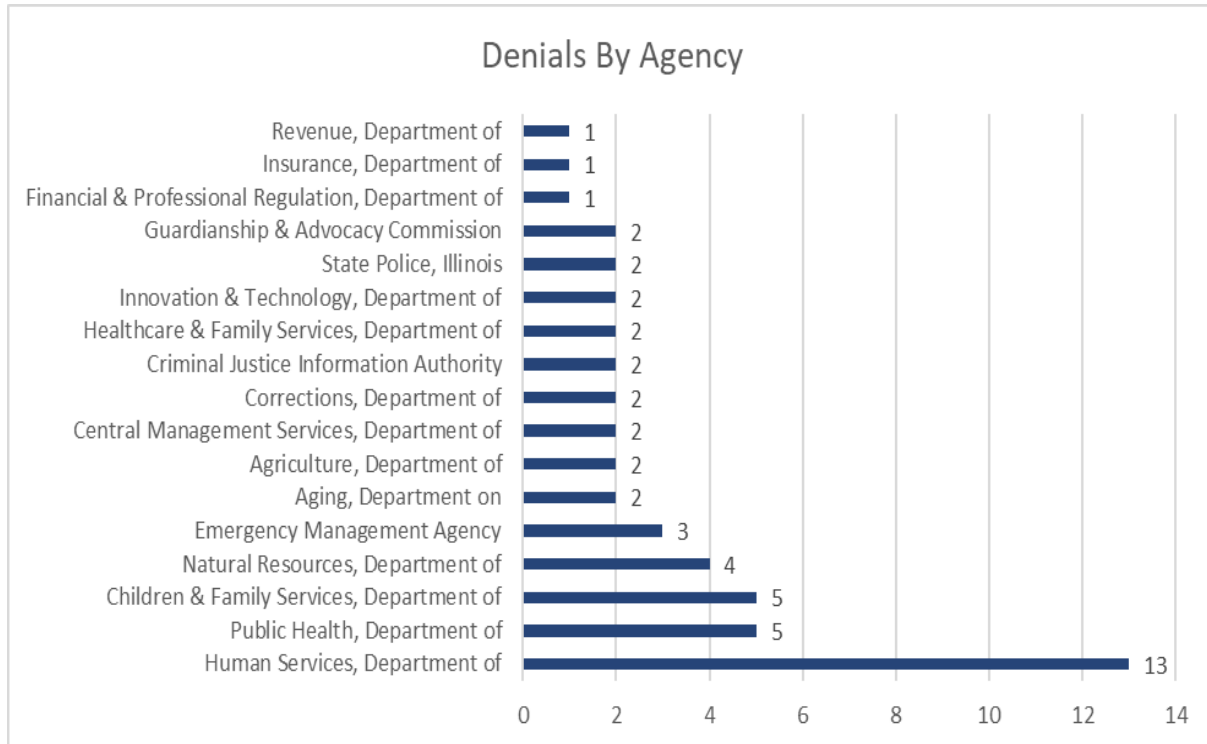| Agency	Count
Revenue, Department of	1
Insurance, Department of	1
Financial & Professional Regulation, Department of	1
Guardianship & Advocacy Commission	2
State Police, Illinois	2
Innovation & Technology, Department of	2
Healthcare & Family Services, Department of	2
Criminal Justice Information Authority	2
Corrections, Department of	2
Central Management Services, Department of	2
Agriculture, Department of	2
Aging, Department on	2
Emergency Management Agency	3
Natural Resources, Department of	4
Children & Family Services, Department of	5
Public Health, Department of	5
Human Services, Department of	13

Utilizing Denials for Training

Denials play a crucial role in identifying additional training opportunities. The Compliance Team leverages these instances to teach and train on the Comprehensive Employment Plan, helping agencies understand the requirements and avoid future denials. Denials are used to identify and address areas needing further training. This approach ensures continuous improvement and compliance adherence across all agencies.

Agency Training and Customer Relations

The Compliance Office, along with personnel from the Hiring and Selection and Personnel Integrity departments at CMS, strives to conduct in-person visits at State Agencies to foster positive customer relations, address all questions and concerns, and enhance the understanding of key governing documents affecting the hiring process. The primary focus during these visits includes:

- Comprehensive Employment Plan (CEP)
- Personnel Code and Rules
- Transactions Manual
- Hiring Process Training Manual

Meeting Preparation

For each meeting, an analysis of compliance data is conducted, which includes:

- Increases in denial rates
- Tracking the arrival of new key leaders
- Monitoring large HR staff turnovers

The Compliance Office develops a focused training program to educate State employees on the principles of the CEP and to equip them with the necessary tools for the consistent and transparent operation of the State's personnel functions.

Coverage Period and Future Plans

Current Reporting Period

Due to staffing shortages and competing workload priorities, the Compliance Office completed only one in-person visit during the coverage period of this report. However, with the CCO position now filled and staffing levels returned to baseline, a significant increase in agency learning opportunities is expected in the next reporting period. Several in-person visits have already been scheduled. The following chart shows all site visits conducted and scheduled.

Agency	2024	2023	2022	Notes
Abraham Lincoln Presidential Library & Museum (19)	July 23, 2024			
Capital Development Board	August 13, 2024	March 30, 2023		
Central Management Services		June 14, 2023		
Department of Agriculture		January 18, 2023		
Department of Children& Family Services			October 27, 2022	
Department of Corrections			July 12, 2022	
Department of Human Services			May 5, 2022	
Department of Innovation & Technology		April 4, 2023		
Department of Public Health		August 22, 2023		
Department of Transportation			August 10, 2022	Invited 2024
Department of Veteran Affairs	June 13, 2024	March 1, 2023		
Emergency Management Agency	August 21, 2024	April 25, 2023		
Financial & Professional Regulation	August 14, 2024			
Healthcare & Family Services, Department of	August 28, 2024			
Illinois State Police		March 30, 2023		Invited 2024
Insurance, Department of	August 27, 2024			
Liquor Control Commission	July 30, 2024			
Natural Resources, Department of				Invited 2024
Revenue, Department of	July 30, 2024			
Yearly Totals	9	8	4	

Success and Future Goals

The in-person meet-and-greet initiative, started in 2022, has been highly successful and has positively impacted the quality of requests received. The Compliance Office aims to continue a more consultative approach, which is expected to:

- **Reduce** the total number of compliance requests over time
- **Improve** the quality of submissions
- **Minimize** back-and-forth discussions between agencies and Compliance
- **Shorten** the time to close a compliance request

Historical and Future Planning

- **Past Success**: The initiative has improved request quality and operational efficiency.
- **Future Goals**: Strive to visit every agency at least annually. Although this goal has not yet been achieved, progress is being made toward it.

Summary

The Compliance Office's efforts to conduct in-person visits and provide focused training are aimed at building stronger relationships with State Agencies, enhancing understanding of compliance requirements, and improving the overall efficiency and quality of the hiring process. With the recent staffing adjustments, these initiatives are set to expand significantly in the coming reporting periods.

Compliance Training Projects Complete

Hiring Process Training Manual

- **Contribution**: Provided input for the latest version of the Hiring Process Training Manual.
- **Impact**: Ensured the manual reflects up-to-date practices and compliance standards.

CMS BoP Guidance on Failed Sequences

- **Contribution**: Offered input for CMS BoP guidance to agency HR staff regarding failed hiring sequences.
- **Impact**: Helped develop clear protocols and guidance to address and prevent failed sequences, improving overall hiring efficiency.

BoP Admin Queries

- **Contribution**: Provided input on all queries to BoP Admin.
- **Impact**: Enhanced the accuracy and consistency of responses, ensuring all queries are addressed comprehensively.

Return to Merit Comp Change Decision

- **Contribution**: Contributed to the decision-making process regarding the Return to Merit Comp change.
- **Impact**: Supported a decision that aligns with compliance and merit-based employment principles, promoting fairness and transparency in personnel management.

Summary

These completed projects reflect the Compliance Office's ongoing efforts to provide valuable input and guidance, ensuring that all aspects of the hiring process and compliance training are thoroughly reviewed and improved. By contributing to key documents and decisions, the Compliance Office enhances the overall efficiency, transparency, and fairness of the State's personnel functions.

Political Compliance

Political Discrimination

Instances of political discrimination, or allegations thereof, must be reported on a semi-annual basis. According to the Comprehensive Employment Plan (CEP), political discrimination is comprehensively defined to ensure clarity and accountability.

Reporting Period Summary:

- **Incidents**: There were no reports of political discrimination during this reporting period.
- **Implication**: This absence of reports reflects the stability of the State's and the Governor's reform measures, indicating successful implementation and adherence to anti-discrimination policies.

Political Contacts

CMS provides notices of reports of political contacts, as required by the CEP's detailed definition of political contacts.

Reporting Period Summary:

- **Incidents**: CMS Personnel Compliance received two reports of political contacts via the Political Contact SharePoint page, a decrease from five reported in the previous period.
- **Details**:
  - **Department of Human Services (DHS):**
    - **Incident**: An applicant for a DHS position uploaded letters of recommendation from one state government director and one university administration director, both from Arizona and written in 2009.
    - **Action**: CMS Compliance advised DHS to disregard the letters of recommendation.
  - **Central Management Services (CMS):**
    - **Incident**: An employee of an Illinois State Representative emailed a CMS employee inquiring about the status of a position.
    - **Action**: CMS Compliance informed the submitter that they did the right thing by forwarding to CMS Personnel and instructed they could inform staffers that disclosing non-exempt employee information is strictly prohibited.

Overall Political Compliance Summary

- **Political Discrimination**: No reports were filed, indicating effective adherence to anti-discrimination policies.
- **Political Contacts**: Two reports were handled appropriately, with no impact on hiring outcomes, showing compliance with established protocols.

These findings demonstrate the ongoing commitment to maintaining a fair and unbiased hiring process, upholding the principles outlined in the CEP, and supporting the integrity of the State's personnel management system.

Meet the Team

CCO – Chief Compliance Officer

Primarily responsible for the Bureau of Personnel's statewide compliance efforts. Manage and supervise staff responsible for internal quality control checks for the hiring system across State government. Communicate and enforce the Personnel Code and Rules consistent with the CEP.

Donna Rogers Skowronski, SPHR, SHRM-SCP, IPMA-CP, Chief Compliance Officer. New to the Compliance Team as of May 16, 2024, Donna brings a wealth of knowledge and experience having served the state since 2002 in HR lead and education roles previously at DHS, CDB, and UIS. Her consulting experience in private, public, and non-profit will contribute to the desire to be a go to department for agencies statewide when seeking proactive guidance and best practice among all employers we compete against for the best possible candidates in the labor market.
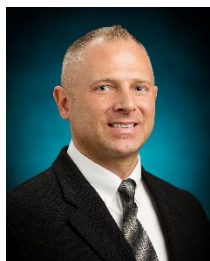
CO – Compliance Officers

Compliance Officers are all responsible for Performing compliance reviews of live and completed hiring sequences. Analyzing hiring data to develop risk assessments. Completing written reports on compliance monitoring.

Julie Brightwell, SPHR, Compliance Officer, arrived Sep 16, 2021. In addition to the last almost three years with CMS Compliance, Julie adds approximately 20 years of HR experience, specializing in classifications and compensation at SIU School of Medicine. She also worked for the Department of Corrections and the Department on Aging, where she learned all aspects of state agency HR. Julie earned an MBA and maintains her SPHR certification. Julie's knowledge and experience are a great asset to the Compliance Team.

Amy Gurnitz, PHR, Compliance Officer, arrived Sep 16, 2021. In addition to the last almost three years with CMS Compliance, Amy contributes over 20 years of HR and management experience working for Hewlett Packard, HSHS Medical Group, HD Smith, and the University of Illinois, Springfield. Amy's aptitude towards internal and external reporting, internal investigation, auditing, compliance, and labor and employee relations contribute greatly to the Compliance Team.

Shawn Wilson, CHC, CCEP, Compliance Officer, arrived Sep 16, 2021, after having begun his work in compliance in 2011. In addition to the last almost three years with CMS Compliance, Shawn's experience includes Compliance, Ethics, and Privacy Officer responsibilities in the Illinois private sector and Compliance & Ethics Officer and Conflicts of Interest Manager within the State University System. He holds Certified in Healthcare Compliance (CHC) and Certified Compliance & Ethics Professional (CCEP) certifications. Shawn's knowledge and experience with public sector compliance adds vast depth to the Compliance Team.

Compliance Reports

The following is a list of reports with definitions that are done on a regular basis to ensure monitoring and compliance of activities among all agencies under our purview.

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

The 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

The 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

The 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.

Resources and Contacts

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

Donna Rogers Skowronski, MEd., SPHR, SHRM-SCP, IPMA-CP
Chief Compliance Officer (CCO), Bureau of Personnel | Room 503-D
Illinois Department of Central Management Services
401 S. Spring Street, Springfield, Illinois, 62760
O: 217-836-6483; Donna.Skowronski@Illinois.gov

Compliance requests can be directed to: 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