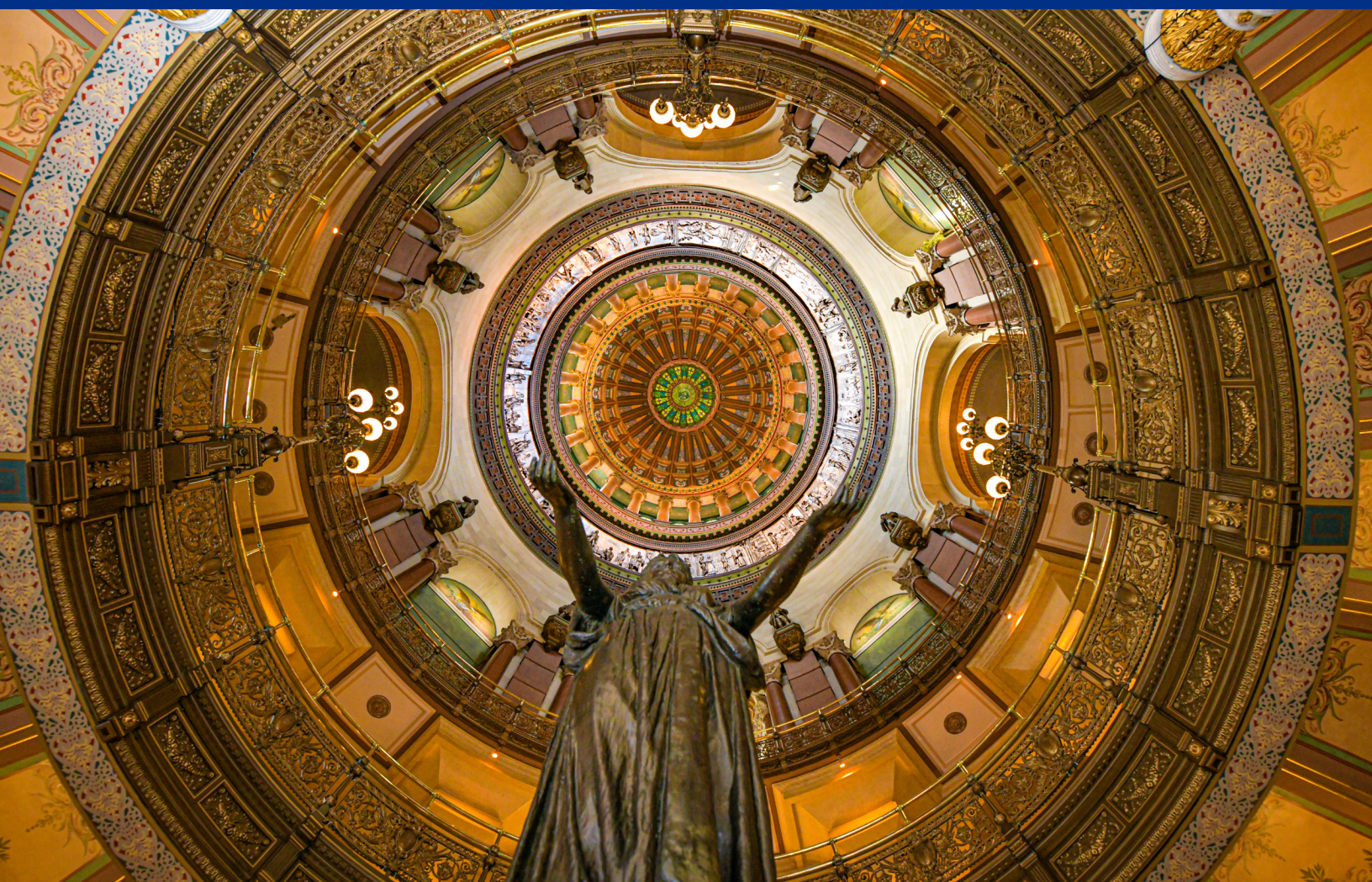


State of Illinois
Department of Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT

January 1, 2026-June 30, 2026



Compliance Office
Bureau of Personnel
Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT JANUARY 1, 2026-JUNE 30, 2026

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Executive Summary

The reporting period for this Semi-Annual Compliance report covers January 1, 2026, through June 30, 2026. Everything within this report covers activities only handled and tracked by Illinois Department of Central Management Services (CMS) Bureau of Personnel (BoP) Compliance division. According to the CEP Semi-Annual reporting requirement, there are five topics listed below that must be covered in this report and are summarized in this executive summary:

- (i) auditing activities as required by this CEP;
- (ii) any violations of the CEP discovered, including Political Contacts, Political Discrimination, and Material Employment Hiring Errors (MEHE);
- (iii) any remedial actions recommended;
- (iv) any corrective actions taken by CMS and the affected agencies to address the violations; and
- (v) audits conducted.

The details of each of the above required sections are as follows:

(i) Auditing Activities & (v) Audits Conducted

While typical audits required by the CEP will be discussed below, there were some additional auditing activities conducted at the start of this reporting period that were above and beyond to give an overall historical perspective of trends not available in our current SharePoint system. This work allowed for a deeper dive on our last semi-annual review that will be maintained and updated going forward. These activities included:

- A full review of all denials since 2021 to include an update of all varied queries no longer available for submission; and
- Additional research on PSCs from 2021-2023 since our current system counted only those submitted since the department moved from emailed compliance query submission to SharePoint.

A total of six audits were completed during this reporting period to maintain compliance with CEP paragraphs 60 and 70. Typically, 10 employees or contractors are chosen for each audit, which sometimes results in ten different agencies being audited, unless some agencies have multiple employees or contractors pulled that meet the minimum audit criteria mentioned below. *The latter is the reason the Agencies number fluctuates in the tables below.

Temporary Assignments (TA) and Interim Assignments (IA) – These audits focus on assignments that have lasted more than 120 days. The goal of the audit is



to ensure that a valid justification supports the TA or IA and are not being used to avoid posting these jobs for permanent placement. For definition purposes, a TA covers Bargaining Unit (BU) positions and an IA covers merit compensation (MC) positions.

Total Audits Conducted	CY Time Frame	Audit Type	Employees Covered	Total Agencies* Audited	Agencies Audited
2	Q3 & Q4 2025	TAs of BU Employees	20	14	AGR, ALPLM, CJIA, DCFS, DES, DFPR, DJJ, DNR, DOC, DOT, DPH, HFS, ISP, REV
2	Q3 & Q4 2025	IAs of MC Employees	20	8	DCEO, DES, DHS, DNR, DOC, HFS, IGB, ISP

Personal Services Contracts (PSC) – These audits focus on contractors that have been extended past one year – to ensure that a valid justification supports the PSC and is not being used to circumvent the required hiring process.

Total Audits Conducted	CY Time Frame	Audit Type	Contractors Covered	Total Agencies* Audited	Agencies Audited
2	Q3 & Q4 2025	PSC	20	12	AGE, AGR, CMS, DCEO, DES, DHS, DNR, DVA, IDFP, IGB, IWCC, SRS

Overall, these audits found valid justification that supported each of the employee or contractor assignments. There were several recommendations made to agencies to post the position through competitive selection, and some were warned that upon next renewal, if submitted, they would be further scrutinized to support the spirit and intent of the CEP. Since this overall activity has shined a light on a variety of situations that should be resolved as soon as possible, the Compliance team continues to increase vetting and has been reducing the overall time frame for approvals to force the agency to competitively select or work with their staffing partners to note opportunities for full-time, regular employment in these positions when possible. To improve overall communications, these audits are not only emailed to the agencies, but a redacted version is housed on the Compliance workbench for all agency communication and training purposes.



In addition to the CEP required audits previously mentioned, a monthly Exempt List (EL) audit has been ongoing since Fall of 2025. The intent to fill form was updated and we now use the Governor's Office (GO) approval, Civil Service Commission (CSC) agenda minutes, and Classifications activities related to exempt work to ensure all changes to the exempt list are within the correct month and approved by all required parties. Additional scrutiny has now been put in place related to multiple incumbents on the exempt list to include full time incumbents and temporary assignments such as IA, PSC, and 75-day appointments.

(ii) Violations of the CEP

Violations are typically handled via denials and Employment Hiring Error (EHE) submissions where Compliance Officers (CO) work with all parties to mitigate the situation to come to a resolution that minimizes risk. This report goes into detail about the denials issued, EHEs as well as political contacts and discrimination. In addition, as per the CEP, any EHE that is initially determined to potentially be material is reported to OEIG-HEM within the first 48 hours of learning of the possibility. They are updated as soon as the mitigation occurs, and BoP Admin determines the materiality of the error. More detail on the topic of errors is covered separately later in the report.

(iii) Remedial Action Recommended

With the efforts described in this section last reporting period, the overall errors have decreased significantly. Only one agency as described below will be invited to upcoming training that will cover prevention avenues in full detail.

(iv) Corrective Actions Taken by CMS

While this cycle has been a learning opportunity for the Chief Compliance Officer (CCO) as well as the entire CMS BoP Compliance Team, the previously mentioned corrective actions such as denials, agency warnings, and more detailed scrutinization will continue to be at the forefront of the activities.



DHS Awardee - Donna Skowronski, Julie Brightwell, Britany Vespa, Shawn Wilson, Samantha Helton, Riya Patel, Angela Finley, Amy Gurnitz

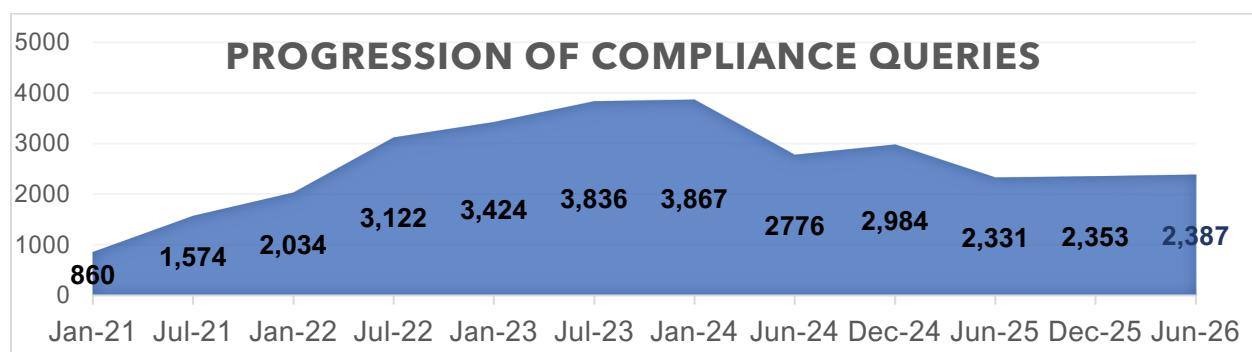


Progression of Compliance Queries

The CMS BoP Compliance Team manages daily requests from over 50 Agencies, Boards and Commissions (referred to as agencies in this document) throughout the state divided among three CO's who have been in the position since 2021. The officers rotate their agency assignments on a quarterly basis, now using a macro that at least initially ensures they don't have the same group of Agencies as the previous quarter. The macro fairly distributes based on the number of queries submitted by agency during the last quarter. Unfortunately, the macro does not evenly distribute the total number of agencies by CO, requiring some manual manipulation to ensure site visits and other job duties primarily related to CEP reports are more evenly distributed.

Based on the semi-annual analysis and daily interactions, State agencies are diligently reviewing and adhering to the CEP revised in 2021. For the six months of this semi-annual report, the CMS BoP Personnel Compliance Team completed 2,387 compliance reviews from State agencies, boards, and commissions. That is up by approximately 1.4% from 2,353 compared to Dec '26 report. The last report mentioned HRT transition removing a significant scope of duties that Compliance was originally performing until January 2025. A total of 89 queries were processed as HRT last reporting period and have made a steep decline to only 56 this reporting period. That is a total of 346 queries to date, attributed to the agencies still learning they do not have to submit those corresponding queries to Compliance. The total number of queries processed by HRT is unknown to us because many agencies learned quickly and submitted to HRT once the change was made, hence no longer tracked by the Compliance team.

The following graph illustrates the progression of Compliance since queries began to be counted.



While the following pages go into detail about how these break down into compliance types, agency counts, EHEs, and denials, the following highlights these reporting periods improvements.



Compliance SharePoint Site

Launched in February 2023 and upgraded in June and December 2024, the Compliance SharePoint site is the primary intake method for compliance queries. Continuous feedback has led to improvements in functionality. System use is required to fully utilize the site's capabilities, which will enhance just-in-time reporting and personalized communication during site visits.

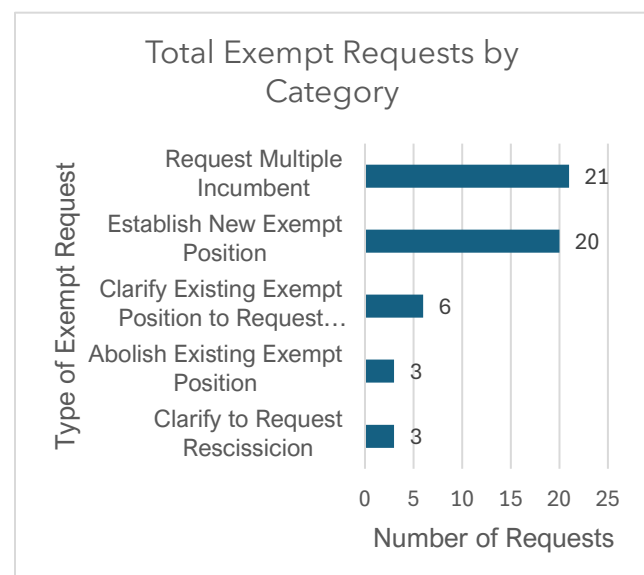
Exempt Positions

CMS Compliance is involved in the exempt position establishment process working with CMS Chief Administrative Officer, OEIG-HEM and the Civil Service Commission. To expedite this process, CMS Project Management created an Exempt Establishment portal that allows agencies to submit the following types of requests:

- Establish a New Exempt Position
- Clarify Existing Position to Request Exemption
- Clarify to Request Recission of Exemption
- Abolish an Existing Exempt Position
- Request MI

The last bullet point above was added during this reporting period, because all Multiple Incumbent (previously known as Additional-Identical) had the potential to require two names on one line of the exempt list at any one time moved from CMS Classifications to CMS Compliance.

Exempt Requests	#
Request Multiple Incumbent	21
Establish New Exempt Position	20
Clarify Existing Exempt Position to Request Exemption	6
Clarify to Request Rescission	3
Abolish Existing Exempt Position	3
Total	53



The table and graph above showcase all types of exempt requests received during this reporting period. Out of 54 total requests, 25 were completed and six were withdrawn by



the submitting agency. This leaves 23 requests still being processed or approved during the upcoming reporting period. Seventy-seven percent of all requests fall under the top two categories, Request MI and Establish New Exempt Position, while minimal requests from the rest of the categories show a clear trend in submissions.

Additionally, the COs work closely with OEIG-HEM on Exempt PSC approval process. According to our reports there were 15 submissions of this type during this reporting period. Eleven of those 15 were renewals and four were new PSC requests. One of the four was a Paragraph 69 exempt request that did not require HEM approval. The CCO is responsible for ensuring all agencies report all exempt positions that are published monthly on the CMS website. The agencies receive automated reminders to update the list with a month end due date so the list can be publicly posted according to CEP requirements. Due to recent errors discovered, this list is now audited monthly.



CMS HRT Awardee: right to left; Julie Brightwell, Donna Skowronski, Becky Collins, Shawn Wilson, and Amy Gurnitz



CMS Personnel Integrity Awardee: right to left; Julie Brightwell, Amy Gurnitz, Micheal Gunn, and Shawn Wilson



CMS Legal Awardee: left to right; Cynthia McIntosh, Julie Brightwell, Jack Roither, and Amy Gurnitz



CMS Labor Relations Awardee: left to right; Julie Brightwell, Shawn Wilson, Jack Roither, Cynthia McIntosh



Distribution of Compliance Queries

The table below illustrates the distribution of compliance queries by category, highlighting the predominance of the top seven categories in the first column. Among the top query types are two of the most highly vetted categories: PSC and Bypass.

Query Type	Count	Query Type	Count
Deviation from Hiring Plan	747	Guidance Only	63
Additional Hires	359	Small Pool – after the fact	24
Personal Services Contract (PSC)	326	Employment Hiring Error	22
Bypass	317	Exempt to Covered	9
Small Pool	289	CEP 49	7
Cancel/Repost	152	Merit Comp Return	2
Other	70		

Deviation from Hiring Plan queries had a sharp rise to the most received query this reporting period, surpassing Additional Hires, Personal Services Contract, and Bypass with a total of 746 (up from 670). Across all 14 query types, the top three most received make up over half the total amount. On the other hand, the bottom three, CEP 49 (7), Merit Comp Return (2), and Deviation (1) are minimal. Overall, the distribution of queries is continuing to be heavily concentrated in a few categories, while several other queries are rarely received, indicating either resolved procedural issues or more consistent internal process.

An internal audit of the Other query category revealed that around one third of these were related to combining sequences. This discovery helps to further understand the category and better categorize queries by possibly adding a new query type.

While there are a couple very time-consuming query category types explained in the below paragraphs, several categories, although lower in numbers, also demand considerable time for each query due to the need for a full review of the hiring sequence. These include Exempt to Covered, as well as EHEs to include CEP P49 Violation and Small Pool After the Fact (SPATF) which will be discussed in more detail later in this report. A CEP 49 violation is when the agency did not seek pre-approval to make an offer to a candidate from CMS as required, which is usually caught by CMS Transactions well after the agency made an offer to hire. Many CEP 49 violations are found after the candidate has started in the position. The chart shows average days to close for all query types with EHEs and CEP 49s taking the longest to vet.



Query Type	Avg Days to Close	Query Type	Avg Days to Close
EHE	6.29	Guidance Only	1.58
CEP 49	3.43	Deviation to Hiring Plan	1.53
Bypass	2.93	Additional Hires	1.46
PSC	2.40	Merit Comp Return	1.33
Cancel/Repost	2.21	Exempt to Covered	1.32
Other	1.86	RDCOI Review	1.27
Small Pool After the Fact	1.77	Small Pool	1.23

Bypass and PSC requests are either the riskiest or are under the largest amount of public scrutiny, which is why the vetting process may extend beyond the two-day turnaround goal.

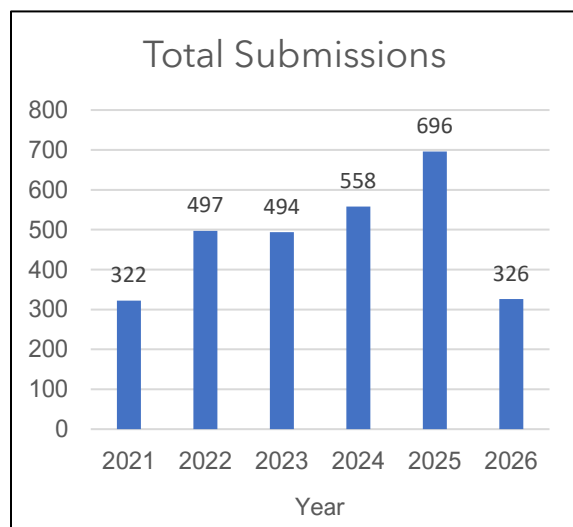
Bypass

Bypass queries are complex, requiring careful review and research to ensure compliance with applicable laws, governing documents, and policies. COs frequently confer with partners in CMS Legal to engage in extensive communication with the requesting agency to provide accurate and consistent responses.

Personal Services Contracts

PSCs are cyclical in nature, accounting for a good majority of the work, especially in December, January, June, and July. This is why the Compliance team asks agencies to submit at least two weeks in advance of the agency's desired contractor start date.

This chart outlines exactly how many PSC compliance queries were submitted by all agencies over the last five-year period. July 1st start date is consistently the most popular statewide. Although it does appear that during the first two years, agencies submitted



them in advance of start dates, as they should and more so than they have been recently, which will be addressed on future site visits.

While 2026 is not yet complete, another concern is the gradual historical increase in PSC submissions. While 326 PSCs look like major improvement from last year's 696, we don't have a full year of data yet. The rest of the year will determine the final trend.

This, along with the focus on the 80% rule for retirees, has been a point of emphasis for the site visits and what prompted the following look-



back at total PSC submissions over the years. Keep in mind, these numbers are only reflective of those processed for approval as required by CEP. Compliance is not privy to any competitively selected PSCs until they are submitted for the quarterly semi-annual reports.

As a reminder, the following is quoted from the CEP Paragraph 63: “*State agencies shall not use Personal Services Contracts in lieu of hiring an individual into an employment position, and may enter these contracts only for good cause, and pursuant to the ... A Personal Services Contract shall not be utilized to circumvent the competitive hiring process for non-exempt positions*”

Agency Breakdown of Compliance Activity

Agency	Total Queries	Agency	Total Queries
DOT	546	ILETSB	18
DHS	335	CDB	15
DOC	150	DOI	15
DCFS	149	IPRB	15
DNR	122	DHR	14
DVA	117	DEC	13
DPH	83	IELRB	12
DA	81	TIRC	12
DJJ	73	DOA	11
DFPR	72	EPA	11
DCEO	58	ALPLM	10
DCMS	57	GC	10
ISP	54	SERS	8
DOIT	52	PTAB	7
DHFS	48	CEI	5
DR	36	DL	5
DES	31	ILRB	5
CJIA	30	IWCC	5
OSFM	30	DMA	2
EMA	27	IRB	2
IGB	21	IDHHC	1
DOL	18	LCC	1

While a slightly smaller large agency Department of Transportation took over top compliance submissions at 546, above the largest agency Department of Human Services (335) this reporting period. The same five agencies as last reporting period remain the top compliance submitters, which correlate with their total workforce numbers, hiring status, and operational complexity. In addition to the two already mentioned above, the top five also include Department of Corrections (150), Department of Children and Family Services (149), and Department of Natural Resources (122).

Smaller agencies such as the Illinois Deaf and Hard of Hearing Commission and the Liquor Control Commission tied with one, and several under ten, have had very low interaction due to smaller staff size or fewer hiring actions in the reporting period.



Employment Hiring Errors

Consistent with the last reporting period, this section will begin with definitions and will summarize the totals for this reporting period ending with a deep dive into the material employment hiring errors reported.

EHE Definitions

Below are a list and definition of each employment error based on the resource sourced:

Error Type by Paragraph # or Other	Definition	Compliance Query Submission Name or Responsibility
CEP 29	Incorrect posting period	HRT
CEP 33	Small pool request submitted late (after the fact)	Small Pool - after the fact
CEP 35	Relationship Disclosure and Conflict of Interest forms completed late	HRT
CEP 36	Interviewer not certified	HRT
CEP 41	Cancellation not requested	Employment Hiring Error
CEP 49	No pre-offer approval from CMS	CEP 49
Personnel Code sect. 8b.7	Veterans' preference violation	Employment Hiring Error or Deviation
Executive Order 18-12	Failed to offer to eligible out of state candidate	Employment Hiring Error

Total EHEs

To get a grasp of the big picture as it relates to employment hiring errors, the three query types, which include SPATF, CEP 49 Violation, and all other EHEs, were added together to come up with an overall total of 52 EHEs, which has decreased by 16% from the former report. The last reporting period emphasized a need for training regarding EHE's and how to avoid them. The Compliance Team started to focus on this topic during site visits scheduled for fall 2025 and beyond. The message to agencies acknowledges that, while some compliance issues may be role-specific, others may be correctable with improved internal coordination.

The most egregious of employment hiring errors, besides an MEHE mentioned later in this report, are SPATF and CEP 49 Violation. Both are explained and pulled out of the numbers below to give more insight to agencies so they can avoid this type of error in the future.

Small Pool After the Fact - CEP P33

The error occurs when an agency requests approval to proceed with a small applicant



pool only after hiring sequence has already progressed or concluded. Compliance allows for a three-day grace period when small pools are unavoidable due to candidates having no shows and last-minute cancellations for scheduled interviews. Beyond this grace period, it is considered a direct violation of CEP policy, which requires agencies to request and receive approval before advancing hiring decisions based on a limited candidate pool. A total of 24 such errors were reported during this period (up from 17 in the last period), with Department of Transportation accounting for the largest share. This is consistent with the last report and from the Compliance team's understanding, DOT's high count reflects a recurring challenge tied to its decentralized HR structure where hiring responsibilities are distributed across regional offices. Addressing these issues will require consistent training, and stronger internal communication protocols across DOT's various hiring offices statewide.

CEP P49 Violation

During this reporting period, six CEP P49 violations were reported, which is down from last reporting period when it was 17. These errors occur when an agency makes a job offer before receiving the required CMS approval. Typically, this is common when agency has an urgent need like State Fair staffing or seasonal snow removal. While the agency does everything required to go onboard in advance and get CMS approval, there are times when a candidate arrives at a job on the first day and decides it's not for them. Agencies then must scramble to get the next person in line hired on the same day because the fair is starting or the snow must be removed for safety. This is not the fault of the agency for doing what they must do in a timely manner to get the job done. However, since it is done on the spot and there is no time for CMS to approve in advance it is still considered a violation by the CEP. Live hiring events were down this reporting period in comparison to others which can also affect this type of violation.

The Department of Veterans Affairs reported the highest number of CEP 49 violations this reporting period with two violations. However, this is a substantial decrease from the ten violations reported last period. Their improvement with CEP 49 violations reflect meaningful progress in addressing compliance issues.

Overall, in most cases, agencies proceeded with offers to avoid service disruptions. While the need for timely staffing is a common operational challenge, adhering to pre-offer approval procedures remains essential to maintain transparency and fairness in state hiring.

Other EHEs

During the reporting period, the CMS BoP Compliance Team worked to resolve 22 other EHEs in addition to those explained above, an increase from 20 in the previous period.

As shown in the chart below, the Department of Veterans' Affairs rose to the top with seven submissions, which is the same amount reported last period.



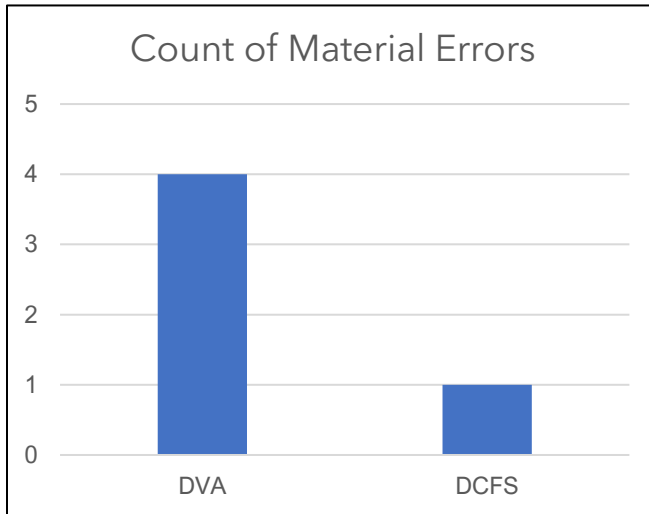
Agency	Submitted	EHE	Small Pool ATF	CEP 49
Department of Transportation	17	0	16	1
Department of Veterans' Affairs	10	7	1	2
Department of Corrections	6	4	2	0
Department of Human Services	5	4	0	1
Department of Central Management Services	2	2	0	0
Department of Children and Family Services	2	2	0	0
Department of Juvenile Justice	2	1	1	0
Illinois Prisoner Review Board	2	1	0	1
Department of Agriculture	1	0	1	0
Department of Employment Security	1	0	1	0
Department of Financial and Professional Regulation	1	0	1	0
Department of the Lottery	1	0	0	1
Environmental Protection Agency	1	1	0	0
Illinois State Police	1	0	1	0
Total Submitted and Per Error	52	22	24	6

Notably, the following list of agencies appeared in both this and the previous reporting period. Their reappearance highlights the need for targeted retraining during their next site visit, particularly in documenting and executing required CEP steps and how to avoid employment hiring errors overall. The compliance team is currently working with HRT staff development to prepare a OneNet version of training focusing on this topic

- Department of Agriculture
- Department of Central Management Services
- Department of Children and Family Services
- Department of Corrections
- Department of Financial and Professional Regulation
- Department of Human Services
- Department of Juvenile Justice
- Department of Transportation
- Department of Veterans Affairs



Material Employment Hiring Errors



Overall MEHEs went up by one this reporting period. Last reporting period had four total MEHEs from three different agencies versus this period there were five total MEHE's from two agencies, the Department of Veterans Affairs and the Department of Children and Family Services. Four of these material hiring errors were made by the DVA, attributed to one sequence that was incorrectly posted. This means they hired the wrong person and had to work with compliance to help mitigate the problem. As the agency had made offers on the sequence

before determining the error, which affected both contractual rights and Other Means candidates, the agency worked to cancel the sequence, correct, and repost, which resulted in conditional offers that had to be rescinded. The last remaining MEHE was made by DCFS due to hiring a candidate out of order. When the agency requested to make an additional hire to fill a vacancy, HRT determined that not all internal applicants had been reviewed. Due to not adding said internal applicants to the original bid record when run, the bid record was deemed incorrect and the hire to be out of order.

The data below provides a broader historical view of MEHEs across reporting cycles. While the overall number remains low out of a total of 62 errors, the timing of the reemergence alongside increased total EHEs in 2025/26 highlights the need for continued oversight and targeted training in specific agencies.



Historical Perspective of Employment Hiring Errors

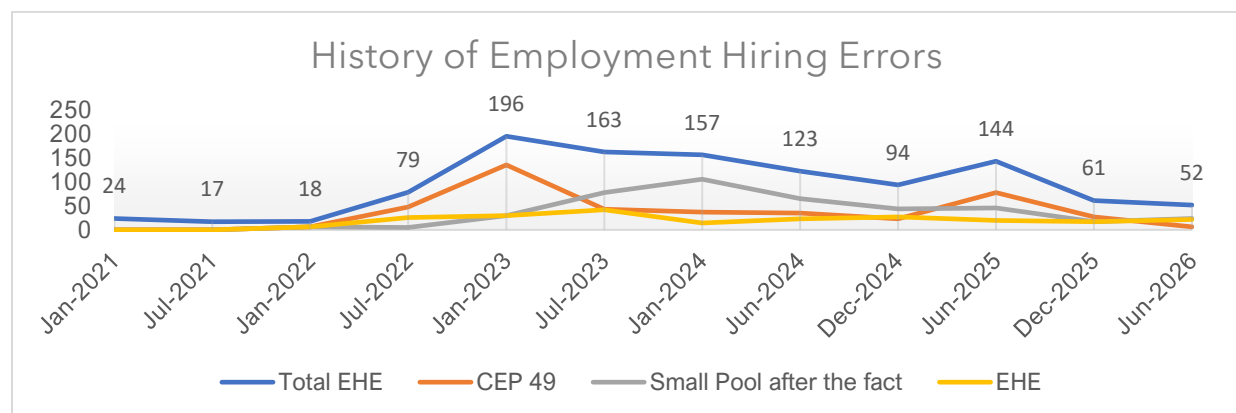
The chart below shows a historical view of total EHEs, broken down by type and reported over eleven cycles from January 2021 through June 2026. This includes all EHEs, SPATF,



CEP 49 violations, and the total count across all categories. Due to how the data was being tabulated in the early years, the detail is currently not available for 2021, but we how to have that researched by the next reporting period.

Type of Error	21-Jan	21-Jul	22-Jan	22-Jul	23-Jan	23-Jul	24-Jan	24-Jun	24-Dec	25-Jun	25-Dec	26-Jun
EHE	-	-	6	26	30	42	14	23	27	20	17	22
SPATF	-	-	6	5	30	78	106	65	44	46	17	24
CEP 49	-	-	6	48	136	43	37	35	23	78	27	6
Total EHE	24	17	18	79	196	163	157	123	94	144	61	52

Although not the highest number historically, there was a sharp uptick in errors between December 2024 and June 2025, with 144 EHEs indicating necessary monitoring. After a strong focus on this topic from Compliance among all business partners at agencies and CMS BOP, it is a relief to see the number of errors take the same sharp downturn during the last two reporting periods. The current total of 52 EHEs is the lowest it's been since January 2022.



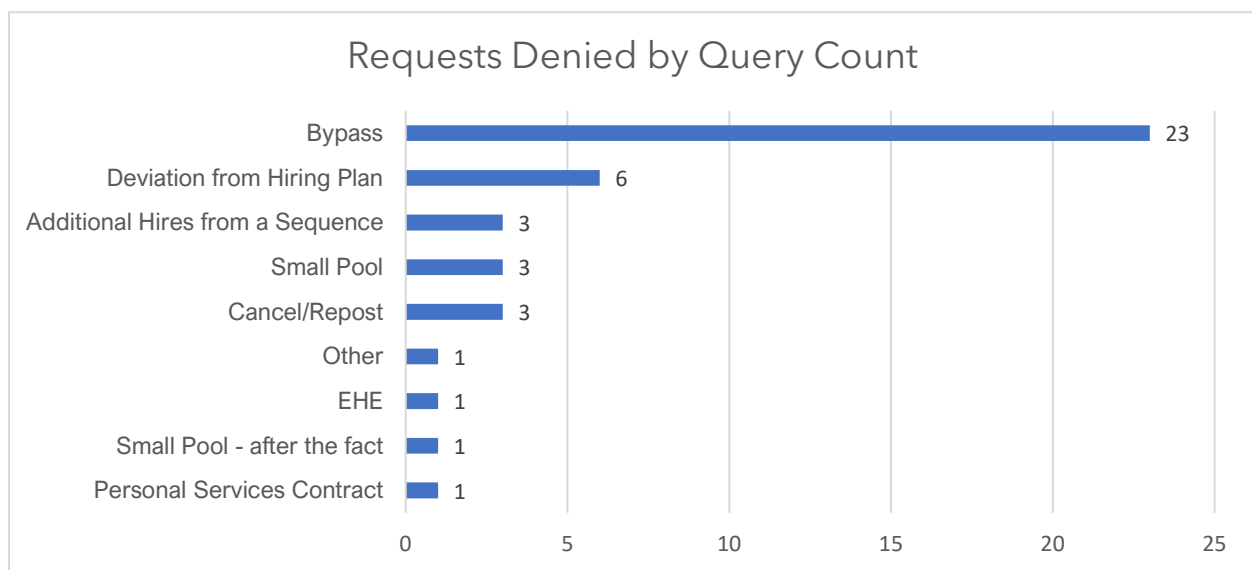
DOC Awardee: left to right; Shawn Wilson, Julie Brightwell, Amy Gurnitz, Tara Owen, Angie Coslow, Mandy Page



Denials by Query and Agency

The CMS BoP Compliance Team collaborates closely with agencies to resolve hiring challenges, achieving compliant solutions most of the time. However, sometimes a solution is not possible, and the request is denied. During this reporting period, Compliance denied 42 requests from 15 agencies covering ten query types as shown in the chart below.

Bypass is consistently the highest denied, at 23 denials this reporting period. This total is nearly four times the next highest query type, Deviation from Hiring Plan, at six denials. On the other hand, four categories have tied for one denial each; Other, EHE, Small Pool-after the fact, and PSCs.



The Department of Human Services is consistent with last reporting period having the most denials of all agencies, with 12 denials this reporting period. The second most denials go to Illinois State Police with five denials, a steep drop from DHS. Across all 15 agencies (down from 16 last report) who received denials, individual agency figures for denials ranged between one and 12. However, without DHS pulling the range up to 12, the rest of the agencies coast between five and one, indicating commendable efforts into submitting well thought-out queries.

Agency	Total Queries	Bypass	Cancel-Repост	Deviation from HP	EHE	PSC	Small Pool	SPATF	Other	Additional Hires
AGR	1	0	0	1	0	0	0	0	0	0
CMS	4	3	0	1	0	0	0	0	0	0
DCFS	4	1	3	0	0	0	0	0	0	0
DOC	3	0	0	2	1	0	0	0	0	0
DEC	1	1	0	0	0	0	0	0	0	0
DES	1	0	0	1	0	0	0	0	0	0

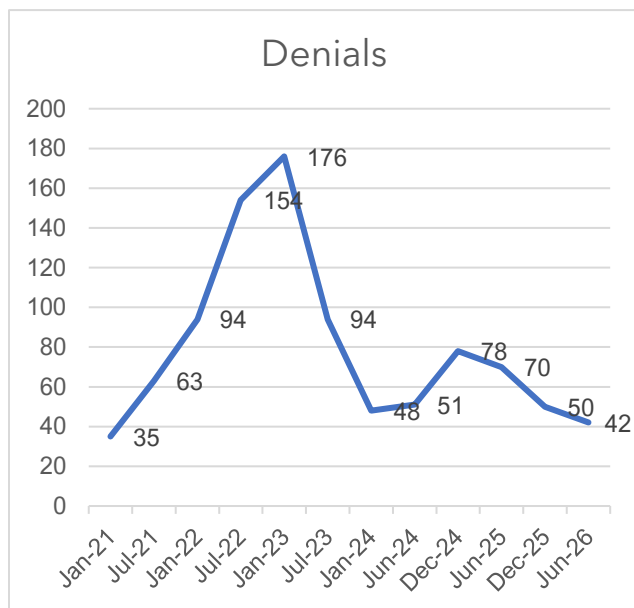


Agency	Total Queries	Bypass	Cancel-Report	Deviation from HP	EHE	PSC	Small Pool	SPATF	Other	Additional Hires
DHS	12	11	0	1	0	0	0	0	0	0
DOIT	1	1	0	0	0	0	0	0	0	0
DJJ	2	0	0	0	0	0	0	0	0	2
DOL	1	1	0	0	0	0	0	0	0	0
DNR	1	0	0	0	0	0	0	0	1	0
DOT	3	1	0	0	0	0	2	0	0	0
DVA	2	1	0	0	0	0	0	0	0	1
EMA	1	0	0	0	0	1	0	0	0	0
ISP	5	3	0	0	0	0	1	1	0	0
Total	42	23	3	6	1	1	3	1	1	3

Note: There were zero denials for the following query types: MC Return, Exempt to Covered, and CEP 49. Guidance Only, Other, and RDCOI are query types not requiring approval.

Historical Perspective of Denials

Historically, denials have remained consistent except for a couple upticks explained over time during the last reporting period. The chart and graph below show the total denials over time. Reporting only 42 denials this period, we are very close to what we started with in 2021. The last uptick in denials was during the July-December 2024 reporting period with 78 denials. Since then, there has been a steady decreasing slope in denials, accredited to compliance focus on problem areas and agencies working on bettering their internal processes to reduce denials.



Semi-Annual Report	Denials
Jan-21	35
Jul-21	63
Jan-22	94
Jul-22	154
Jan-23	176
Jul-23	94
Jan-24	48
Jun-24	51
Dec-24	78
Jun-25	70
Dec-25	50
Jun-26	42



The following is a more detailed analysis of the types of denials for each reporting period. There are several types that are no longer used due to implemented changes. Out of 913 denials since the CEP revision in 2021 and CMS Personnel Compliance tracking process, the most popular denial is Bypass. Since this is one of the most heavily vetted query types and presents the most risk to the state, agency and candidate, it is not surprising. Second to that is Deviation followed by Other which is a category of exclusions related to types of denials that did not fit into any other category.

Denial Types Used Since 2021	26-Jun	25-Dec	25-Jun	24-Dec	24-Jun	24-Jan	23-Jul	23-Jan	22-Jul	22-Jan	21-Jul	21-Jan	Total Denials Per Type
Additional Hires	3	8	9	11	6	1	2	0	0	0	0	0	37
Bypass	23	26	42	47	21	29	32	44	50	28	23	10	352
Cancel	0	0	0	0	0	0	0	0	3	3	0	0	6
Cancel without Making a Hire	0	0	0	0	0	0	0	0	0	1	0	0	1
Cancel/Repost	3	1	3	0	5	4	7	7	15	10	0	1	53
COI	0	0	0	0	0	0	0	11	13	0	0	2	26
Conflict of Interest	0	0	0	0	0	0	0	0	0	5	11	0	16
Deviation from HP	6	7	6	7	5	6	17	30	16	18	7	0	119
EHE	1	0	0	0	0	1	0	5	5	0	0	0	11
Exempt to Covered	0	0	0	0	0	0	0	1	0	0	0	0	1
Hire Below Minimum Score	0	0	0	0	0	0	0	0	0	0	0	2	2
MC Return	0	0	1	0	0	0	0	0	0	0	0	0	1
Other	1	0	6	7	8	2	12	39	17	13	12	4	120
Out of Sangamon County	0	0	0	0	0	0	1	2	6	3	0	0	12
Out of State	0	0	0	0	0	0	0	1	6	1	1	0	9
Political Contact	0	0	0	0	0	0	0	1	0	0	0	0	1
PSC	1	2	1	1	2	3	3	24	8	0	0	16	60
Small Pool	3	4	0	3	2	1	12	11	14	12	9	0	68
Small Pool ATF	1	2	2	2	2	1	8	0	0	0	0	0	17
Term Renewal	0	0	0	0	0	0	0	0	1	0	0	0	1
Total Denials Per Report	42	50	70	78	51	48	94	176	154	94	63	35	913



Political Compliance

Historically, there has been a total of 130 reports to CMS Personnel Compliance between 2021-2026.

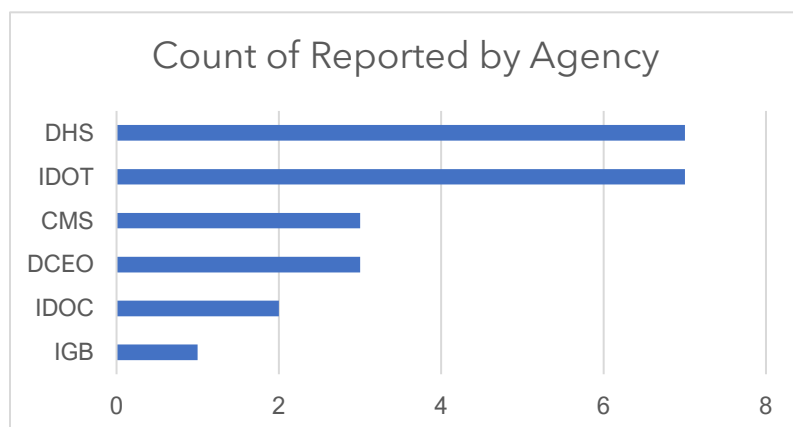
Political Discrimination

Instances of political discrimination, or allegations thereof, must be reported on a semi-annual basis. Per the CEP, political discrimination is comprehensively defined to ensure clarity and accountability. There were no reports of political discrimination during this reporting period, nor has discrimination been found in any of the 130 reports since inception of the reporting system in 2021.

Political Contacts

Unlike last reporting period, political contacts are spread among the agencies, with seven agencies reporting a total of 24 political contacts. While less political contacts would make this an improvement, it is suspected that this indicates more political contacts going undocumented. While the Compliance team has been focusing on reminding HR departments of their CEP reporting responsibility since last Fall, it's being reported to the Compliance team that agencies don't have any politicians reaching out about hiring. It is assumed the communications and legislative partners are doing a good job of making it known that political influence around non-exempt hiring is not acceptable.

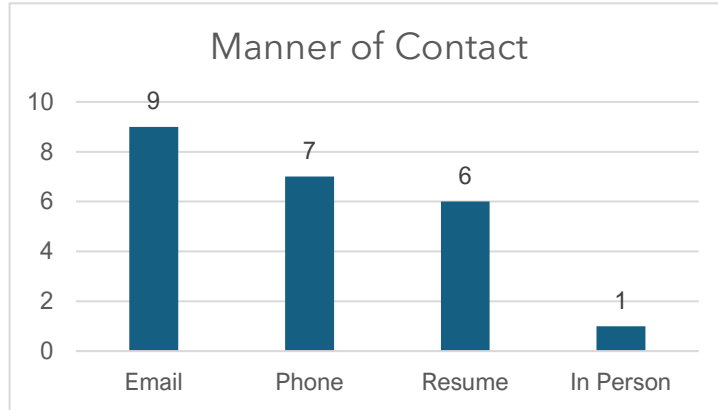
Agencies	#
IDOT	7
DHS	7
CMS	3
DCEO	3
IDOC	2
IGB	1
TOTAL	23



The most common method of political contact was email, staying on theme with last reporting period. Compliance is not concerned with candidates including their work experience with a political contact on their resume or application, but what is concerning is when emails, phone calls, or texts come in directly from the politicians or their representatives inquiring about a candidate's hiring status. The additional breakdown is charted below.



Manner of Contact	#
Email	9
Phone	7
Resume	6
In Person	1



Over half, or 56%, of these reports involved inappropriate contacts, and the majority were asking about specific positions or types related to a constituent candidate. The remaining 10 were not true political contacts. These included political contacts/work history on application materials, poll investigator solicitation, transfer of time balance for incoming employees, and questioning veterans' preference process.

As a reminder, the following is quoted from the CEP section CC: *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 at any personnel involved in an employment action is considered a Political Contact.*

Overall, reports are slowly declining after peaking last year. After having added focus on political contacts, there is some improvement with only 24 reports this period, hopefully this will continue declining this fiscal year.



Year	#
2021	32
2022	14
2023	13
2024	9
2025	38
2026	24



Customer Service and Response Time

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

However, responses can sometimes take longer as you will see in the chart below for the following reasons:

- Referrals to external departments outside of Compliance, such as CMS Legal
- The need to gather additional data from agencies or business partners
- Involvement of multiple COs and possibly the CCO to analyze complex situations
- Response time of the agency when COs question anything related to the submission
- The query type submitted

Agency	TTL Queries	Average Days to Close	Agency	TTL Queries	Average Days to Close
IDHHC	1	11	DHS	334	1.8
DEC	13	5.8	DOC	150	1.8
ALPLM	10	4.9	DOIT	52	1.8
ISP	54	4.1	DFPR	72	1.7
EMA	27	3.1	DHR	14	1.7
DHFS	48	2.7	DOI	15	1.7
ILETSB	18	2.7	IELRB	12	1.7
CEI	5	2.6	DNR	122	1.6
DVA	117	2.4	DA	81	1.6
CDB	15	2.3	DCEO	58	1.5
DL	18	2.3	DMA	2	1.5
DCFS	149	2.2	IRB	2	1.5
OSFM	30	2.2	DES	31	1.5
PTAB	7	2.1	REV	36	1.5
IPRB	15	2.1	LOT	5	1.4
DPH	83	2	IWCC	5	1.4
GAC	10	2	SERS	8	1.25



Agency	TTL Queries	Average Days to Close	Agency	TTL Queries	Average Days to Close
DJJ	73	2	DOT	546	1.2
CMS	57	1.9	ILRB	5	1.2
TIRC	12	1.8	EPA	11	1.2
AGE	11	1.8	CJIA	30	1.1
IGB	21	1.8	LCC	1	1

Overall, among all agencies this period, average response time is up slightly from 2.01 calendar days to now 2.15, which is still less than it was in 2024. While Compliance had three agencies hit the 2.0 targeted time frame, 26 were below target at 1.98 days or less and only 15 were above the threshold, which most likely was often due to case complexity or follow-up requirements. It is, however, sometimes due to agencies being slow to respond not knowing additional specifics or clarifications on their end.

To help keep this goal in mind, each CO can track their own days to close on the assigned queries. Out of the 2,387 total queries handled this reporting period, each CO was assigned between 654-890, which is a huge discrepancy from the period prior, where the average was 769-785. There were a couple reasons for this discrepancy. One related to a system macro error with a goal of even distribution of agencies and queries during each rotation and the other is because the CO with the lowest queries went on leave of absence. Each CO individually averaged 1.64-1.98 days to close, which is lower than the previous reporting period.

Finally, Compliance monitors which query is the oldest by CO so they can ensure they are staying on top of any that are beyond two days where they are either waiting to hear back from a CMS business partner or waiting on responses from the agency requesting the query.

Agency Training and Customer Relations

EHEs and denials play a crucial role in identifying additional training opportunities. The CMS BoP Compliance Team leverages these instances to teach and train on the CEP, 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.

The Compliance Office 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 focusing especially on the CEP, other key documents.



Compliance continues to prepare a presentation that covers an analysis of data specific to each agency, encouraging the Agency Personnel Officer (APO) and HR hiring staff to gain a deeper understanding of what is submitted. It also helps the CMS BoP Compliance Team tailor specific training messages to each agency. So, whether the APO or staff has changed from one visit to another, there is a significant opportunity for learning and development to occur.

The topics covered are pulled from the Compliance SharePoint submission system to include denials, errors, query types submitted, historical data, PSCs, CEP and Exempt List report submission status as well as exempt position management updates.

Overall, the CMS BoP Compliance Team 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 hiring functions. Over the summer of 2025, the team created a survey that provided feedback that was analyzed, and improvements were implemented to affect quality and content of future visits.

The in-person meet-and-greet initiative, started in 2022, has been highly successful and has positively impacted on the quality of requests received. The CMS BoP Compliance Team 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

The Compliance team completed 30 site visits in this period, which is up from 22 during the last reporting period. Twenty were completed during the first quarter while ten were completed during the second quarter.

Agency/Board/Commission	Qtr.	Date
Abraham Lincoln Presidential Library and Museum	1	3/2
Commission on Equity and Inclusion	2	5/16
Criminal Justice Information Authority	1	2/11
Department of Central Management Services	1	2/4
Department of Children and Family Services	1	2/3
Department of Commerce and Economic Opportunity	1	2/2
Department of Corrections	1	3/10
Department of Human Rights	1	2/25
Department of Juvenile Justice	1	3/26
Department of Military Affairs	2	4/8
Department of the Lottery	1	2/10
Department of Transportation	1	2/4



Agency/Board/Commission	Qtr.	Date
Department of Veterans' Affairs	2	4/9
Guardianship and Advocacy Commission	1	3/10
Illinois Arts Council	1	2/26
Illinois Civil Service Commission	1	2/9
Illinois Council on Developmental Disabilities	2	5/12
Illinois Department of Early Childhood	1	2/26
Illinois Gaming Board	1	3/26
Illinois Independent Tax Tribunal	2	6/16
Illinois Law Enforcement Training and Standards Board	1	3/24
Illinois Power Agency	1	3/19
Illinois Prisoner Review Board	1	3/26
Illinois State Police	2	5/26
Illinois State Police Merit Board	2	5/12
Illinois Workers' Compensation Commission	2	4/9
Pollution Control Board	2	6/29
Sentencing Policy Advisory Council	1	2/3
State Employee Retirement System	1	2/24
Torture Inquiry and Relief Commission/Human Rights Commission	2	5/8



DOIT Awardee: From Left to Right: Lois Green, Madison Beyer, Elizabeth Bridges, Lorna Bock, Brittany Vespa, Shelly Ray, Amy Gurnitz, Julie Brightwell and Jessica Jordan



DHS Awardee - From Left to Right: Shawn Wilson, Amy Gurnitz, and Paige Meyer



Accomplishments

The compliance team focused on documentation of standard operating procedures, continued site visit focus on highly vetted query training, and focused on proactive ways to reduce hiring errors.

Traveling Trophy

As mentioned during the last semi-annual report, the compliance team now recognizes outstanding work among agency and internal CMS business partners. The physical trophy is moved from one Springfield location to another while all our Chicago-based agency HR departments receive a certificate of accomplishment. Both are pictured to the side and below. During this period the following were recognized.

Agency Trophy Awardees

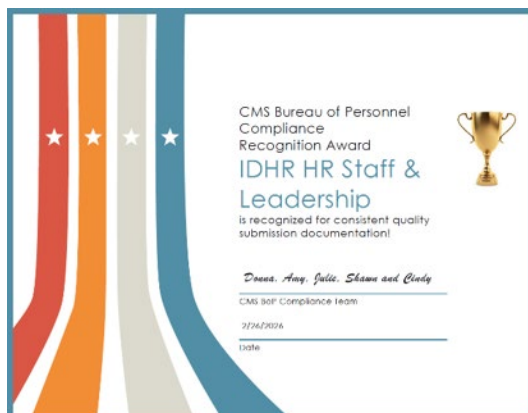
- DHR
- DHS
- DOC
- DOIT
- DPH
- LCC



*CMS Compliance
Traveling Trophy*

Internal Business Partner Trophy Awardees

- Micheal Gunn, CMS Personnel Integrity
- Zach Lancaster, CMS Project Management
- Jack Roither, CMS Labor Relations
- Becky Collins, Small Agency and Response Team



Certificate for IDHR (Chicago-based agency)



Certificate for LCC (Chicago-based agency)



Compliance Training Projects Completed

In addition to site visits previously mentioned, the CMS Personnel Compliance team met with and trained agency HR personnel multiple times during this reporting period. For example, the Compliance Officers met one on one with the following agencies to go over a variety of topics mentioned below.

- DCEO – Political Contacts
- ISP – Bypass
- DOC – TA Reports
- DJJ – Bypass
- DoIT – CEP Reporting
- DCEO – Political Contact Reporting
- EPA – CEP Reporting

Additional planned training occurred involving the entire compliance department when they joined forces with the HRT Management team to train their department on the following topics:

- Overall Compliance Queries Processed over 2-year period
- Thorough Definitions
 - Employment Hiring Errors
 - Material Hiring Errors
- Preventing Errors
- Summary to Include Reminders from December 2024 Training

The team worked very closely with HRT trainers on three different training projects during this reporting period. One of our compliance officers got feedback from various sources regarding a couple important edits that could not wait for the annual update on the Bypass training that occurred early this reporting period just after it was released.

The other two COs worked with the HRT training staff to create brand new training to be released sometime this year on Personal Services Contacts and Employment Hiring Errors. While the first topic is essentially done and waiting to be posted on OneNet, there is still more work to be done on the latter.

The PSC training is expected to be available soon on OneNet for all agency HR to take just like previously developed Bypass training. Reports can be run on all courses to see who has taken them, which is done regularly especially when agencies have employment hiring errors.



Reports, Audits and HEM Responses

Monthly

Agency Exempt List Review and Certification and CMS Compliance Audits – All agencies report changes to exempt positions that are not protected by the personnel code between the 5th and 25th of each month post changes in hiring, positions, etc. To ensure compliance with the CEP, an audit is conducted monthly against all approvals processed by the CSC and the Governor's Office.

Quarterly

Agency PSC Reports and CMS Compliance Audits – Per paragraph 70 of the CEP, all agencies under the governor's jurisdiction must provide quarterly reports regarding all PSC (or renewals or amendments to such contracts) for all existing PSCs. A sample from these reports shall be audited on a quarterly basis focusing on those that have been extended over the past year to ensure valid justification supports the hiring of a PSC. CMS CCO may require that a PSC that does not adhere to the CEP be ended.

Agency TA and IA Reports and CMS Compliance Audits – Per paragraph 60 of the CEP, all agencies under the governor's jurisdiction must provide quarterly reports regarding all TA or IAs that exceed 60 days, and which include the name, title, TA/IA title, TA/IA start date, reason for TA/IA and duration of TA/IA (including any extensions or renewals). Any requests to extend any TA/IA, and the response (from CMS or the applicable Union) shall also be included. A sample from these reports shall be audited on a quarterly basis focusing on those that have lasted more than 120 days to ensure that a valid justification supports the TA or IA. The CMS CCO may recommend that a TA or IA that does not adhere to the CEP be ended.

CMS Compliance Report to OEIG HEM – Per paragraphs 28 and 96 of the CEP, the CMS BoP Compliance Team will report all requests for adjustments/deviations and its response to HEM as well as all deviations from pre-established hiring plans; potential conflicts of interest; and a listing of all reviews of hiring sequences for non-Exempt positions where the selected candidate was employed in an Exempt Position immediately prior to being selected (referred to as Exempt to Covered). This detail is included in this Semi-Annual report.

Semi-Annual

Compliance Report – Per paragraph 95 of the CEP, the CMS BoP Compliance Team shall issue semi-annual reports on or around every March 15 and September 15 to the Governor's Office and the OEIG-HEM, describing its activities during the prior six months, including but not limited to: (i) auditing activities as required by this CEP; (ii) any violations of the CEP discovered, including Political Contacts, Political Discrimination, and MEHEs;



(iii) any remedial actions recommended; (iv) any corrective actions taken by CMS and the affected agencies to address the violations; and (v) audits conducted. These semi-annual reports shall be posted publicly on the CMS website.

Agency Report – Per paragraph 61 of the CEP, all agencies under the Governor’s jurisdiction must report all seasonal and intern hires to CMS Compliance and HEM on a semi-annual basis.

Ongoing

HEM Advisory Responses – CMS Personnel Compliance did not have any responses during this reporting period.

Contacts and Resources

For questions about this report, please contact the CCO.

Donna Rogers Skowronski, MEd., SPHR, SHRM-SCP, PSHRA-CP
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Bureau of Personnel | Room 503-D
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401 S. Spring Street, Springfield, Illinois, 62760
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CMS Personnel 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>



*CMS BoP Compliance Team-From Left to Right: Amy Gurnitz,
Julie Brightwell, Shawn Wilson and Donna Skowronski*

