State of Illinois
Department of Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT
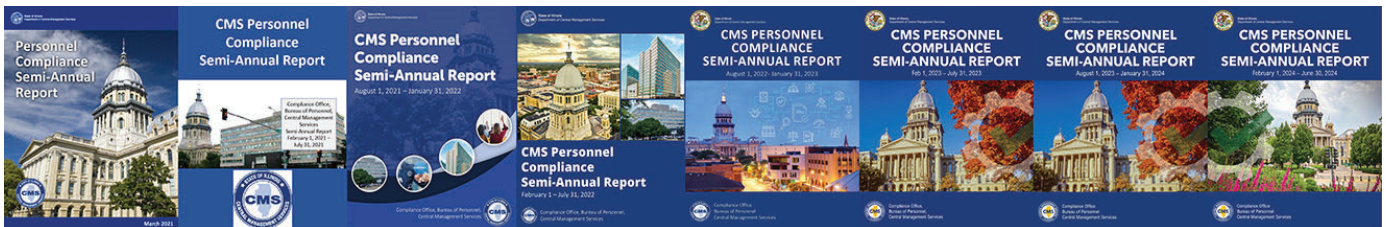
July 1, 2024 – December 31, 2024

Compliance Office
Bureau of Personnel
Central Management Services

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**ILLINOIS CENTRAL MANAGEMENT SERVICES**

Executive Summary

CMS Compliance has been fortunate to have three original compliance officers hired in 2021 who helped build the processes of this department along with the first Chief Compliance Officer. As a result they have been very consistent about how they process each query while managing daily requests from 57 different agencies. They agencies are divided among the compliance officers on a quarterly basis currently managing 19 different agencies each. While the department started in 2019 the query counts did not start until the year this team was hired. Thus they have witnessed the steady growth for several years and recent decline as a result of their efforts.

State agencies are diligently reviewing and adhering to the Comprehensive Employment Plan (CEP) revised in 2021. For the six months of this semi-annual report, the CMS Personnel Compliance Office completed **2984 compliance reviews** from State agencies, boards, and commissions. This is up from 2776 during the last five month reporting period. If we compare to Mar 24 report which was a full six months it is actually down by 22% from 3867 which can be attributed to improvements in our Human Capital Management system reducing errors requiring compliance approval requests.

The following graph illustrates the progression of compliance since queries began to be counted.
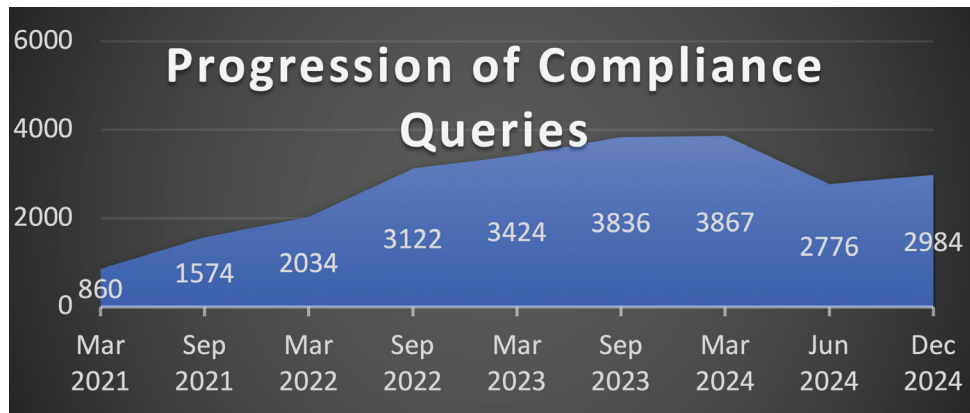
While the following pages go into detail about how the 2984 break down into compliance types, agency counts, employment errors, and denials, the following highlights this reporting periods improvements.

Compliance SharePoint Site
Launched in February 2023 and upgraded in June and December 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 communication during site visits. Additionally, the latest upgrade allowed approved PSCs to automatically feed the required quarterly reporting system. While there is some transition tasks involved this will eventually remove the reporting burden from agencies for at least those PSCs that are not competitively selected.

Exempt Positions
CMS Compliance is involved in the exempt position establishment process working with CMS Chief Administrative Officer, OEIG Hiring and Employment Monitoring division and the Civil Service Commission. Additionally, they work very closely with OEIG HEM during the Exempt PSC approval process. Finally, they are responsible for ensuring all agencies report all exempt positions that are published monthly on the CMS website. For the first time ever, the CMS Compliance department audited the exempt list to ensure all positions previously approved were listed on that report while working with agencies to get it corrected.

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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. The greatest influence on this is partner and agency response times.

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.

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 compliance process or system improvements during site visits.
- **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 constantly update the state-wide SharePoint site as the primary intake method for compliance queries and reporting.
- **Political Contacts System**: A separate public facing website connected to a different SharePoint system for political contacts is in place, offering similar capabilities for trend analysis.

Improve Customer Value and Reduce Waste

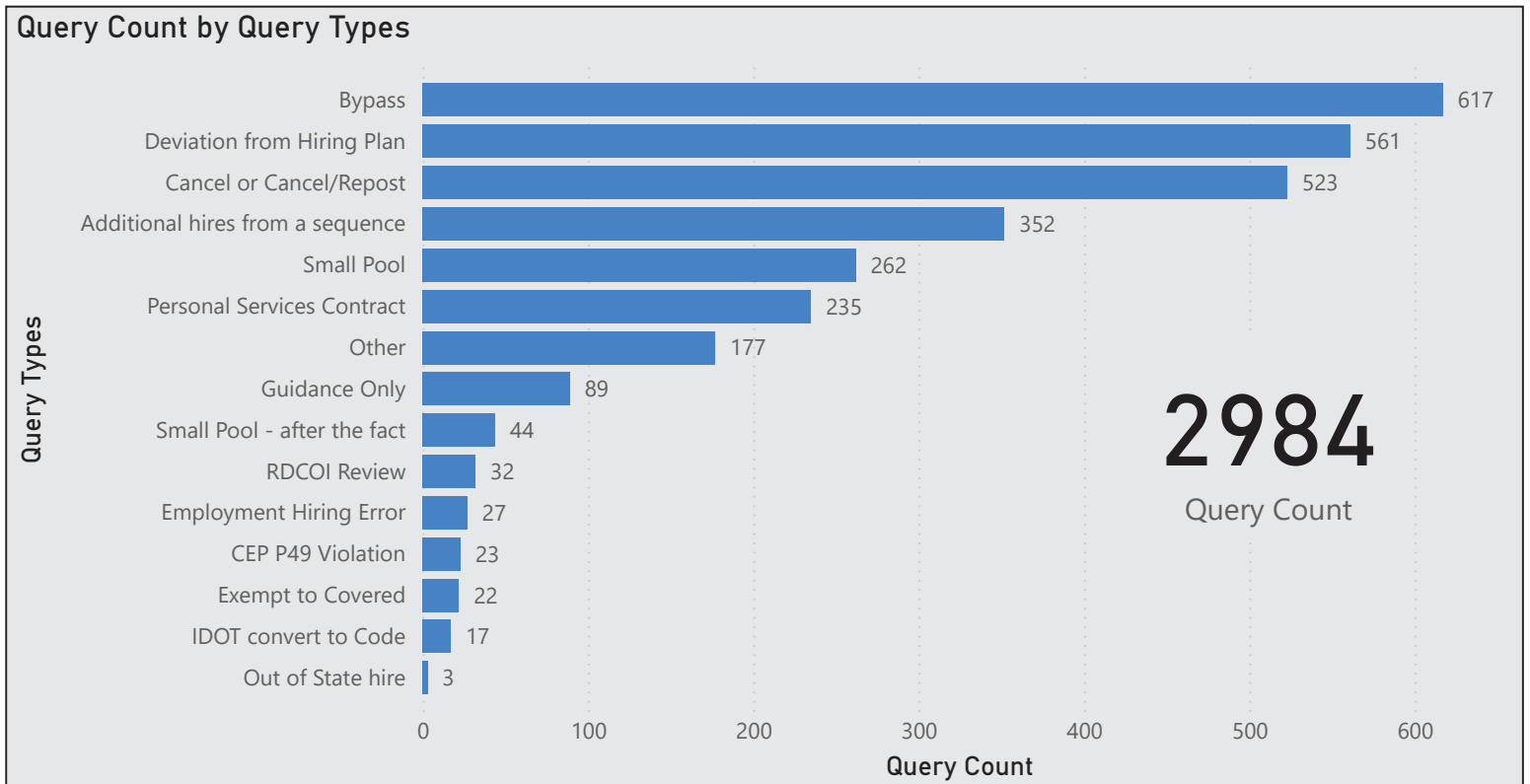- **Eliminate Redundant Checks**: We have removed compliance approval on some situations where data indicated a lack of trend or the existence of redundant checks within the Bureau of Personnel (BoP).
- **Ongoing Process Review**: After zero-basing all requests to assess the value of continuing them,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

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Distribution of Compliance Queries

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.

At 617, Bypass had the highest query count and was significantly higher than the lowest query type. Across all 15 query types the count ranged from 3 to 617. The lowest query "Out of State" at three (3) is due to not requiring this query anymore due to the most recent contract negotiations although some still submit.

Query Count by Query Types

Query Type	Query Count
Bypass	617
Deviation from Hiring Plan	561
Cancel or Cancel/Repost	523
Additional hires from a sequence	352
Small Pool	262
Personal Services Contract	235
Other	177
Guidance Only	89
Small Pool - after the fact	44
RDCOI Review	32
Employment Hiring Error	27
CEP P49 Violation	23
Exempt to Covered	22
IDOT convert to Code	17
Out of State hire	3

2984 Query Count

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, and Exempt to Covered.

Bypass Queries Bypass queries although often the most time-consuming and complex, 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.

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.

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Query Count by Agency

Agency	Query Count
Human Services, Department of (10)	610
Corrections, Department of (29)	469
Transportation, Department of (23)	282
Children & Family Services, Depart...	240
Public Health, Department of (20)	166
Innovation & Technology, Depart...	127
Veterans' Affairs, Department of (3...	109
Revenue, Department of (25)	106
Natural Resources, Department of ...	78
State Fire Marshal, Office of (50-50)	67
Environmental Protection Agency ...	63
Healthcare & Family Services, Dep...	61
Employment Security, Department...	60
State Police, Illinois (21)	53
Agriculture, Department of (11)	50
Commerce & Economic Opportun...	45
Central Management Services, De...	44
Criminal Justice Information Auth...	43
Insurance, Department of (14)	38
Financial & Professional Regulation	37
Juvenile Justice, Department of (27)	34
Aging, Department on (47)	29
Gaming Board, Illinois (50-69)	25
Abraham Lincoln Presidential Libr...	22
Liquor Control Commission (32)	20
Emergency Management Agency (...	18
Labor, Department of (15)	13
Law Enforcement Training & Stand...	12
Guardianship & Advocacy Commi...	9
Capital Development Board (50-44)	7
Military Affairs, Department of (35)	7
Human Rights, Department of (49)	6
Labor Relations Board, Educationa...	5
Lottery, Illinois State (45)	4
Prisoner Review Board (50-78)	4
State Retirement Systems (50-74)	4
Workers' Compensation Commissi...	4
Human Rights Commission (50-01)	3
Property Tax Appeal Board (50-48)	3
Torture Inquiry Relief Commission	3
Arts Council (50-90)	1
Commision on Equity and Inclusion	1
Deaf & Hard of Hearing Commissi...	1
Labor Relations Board, Illinois (50-...	1

2984
Query Count

Agency Breakdown of Compliance Activity
DHS remains our largest customer with 610 queries followed by Corrections and Transportation. Across all agencies the count ranged from 1 to 610.

Customer Service and Response Time

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 agencies. Our 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 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
- Response time of the agency when we question anything related to the submission

For this reporting period our Average Response Time was 2.10 calendar days, down from 3.02 days in the previous reporting period.

Agency	Measure - Average Working Days
Abraham Lincoln Presidential Library & Museum (19)	2.95
Aging, Department on (47)	2.26
Agriculture, Department of (11)	1.85
Arts Council (50-90)	1.00
Capital Development Board (50-44)	4.17
Central Management Services, Department of (37)	2.14
Children & Family Services, Department of (16)	2.56
Commerce & Economic Opportunity, Department of(42)	2.84
Corrections, Department of (29)	1.56
Criminal Justice Information Authority (50-05)	2.62
Deaf & Hard of Hearing Commission (50-11)	6.00
Emergency Management Agency (50-17)	2.61
Employment Security, Department of (44)	1.16
Environmental Protection Agency (46)	1.48
Financial & Professional Regulation	2.14
Gaming Board, Illinois (50-69)	2.84
Guardianship & Advocacy Commission (50-70)	1.67
Healthcare & Family Services, Department of (33)	2.87
Human Rights Commission (50-01)	2.67
Human Rights, Department of (49)	1.67
Human Services, Department of (10)	1.86
Innovation & Technology, Department of (28)	2.14
Insurance, Department of (14)	1.24
Juvenile Justice, Department of (27)	2.82
Labor Relations Board, Educational (50-14)	2.40
Labor, Department of (15)	3.82
Law Enforcement Training & Standards Board (50-88)	2.33
Liquor Control Commission (32)	5.24
Lottery, Illinois State (45)	3.50
Military Affairs, Department of (35)	5.57
Natural Resources, Department of (12)	3.31
Prisoner Review Board (50-78)	1.50
Property Tax Appeal Board (50-48)	3.00
Public Health, Department of (20)	1.88
Revenue, Department of (25)	1.60
State Fire Marshal, Office of (50-50)	2.48
State Police, Illinois (21)	5.13
State Retirement Systems (50-74)	1.00
Torture Inquiry Relief Commission	2.33
Transportation, Department of (23)	1.72
Veterans' Affairs, Department of (34)	2.49
Workers' Compensation Commission (50-37)	2.50
Total	**2.10**

Employment Hiring Errors

During the reporting period, the Personnel Compliance team worked to resolve 27 Employment Hiring Errors, an increase from 23 in the previous period. The chart below shows the distribution of these errors by agency.
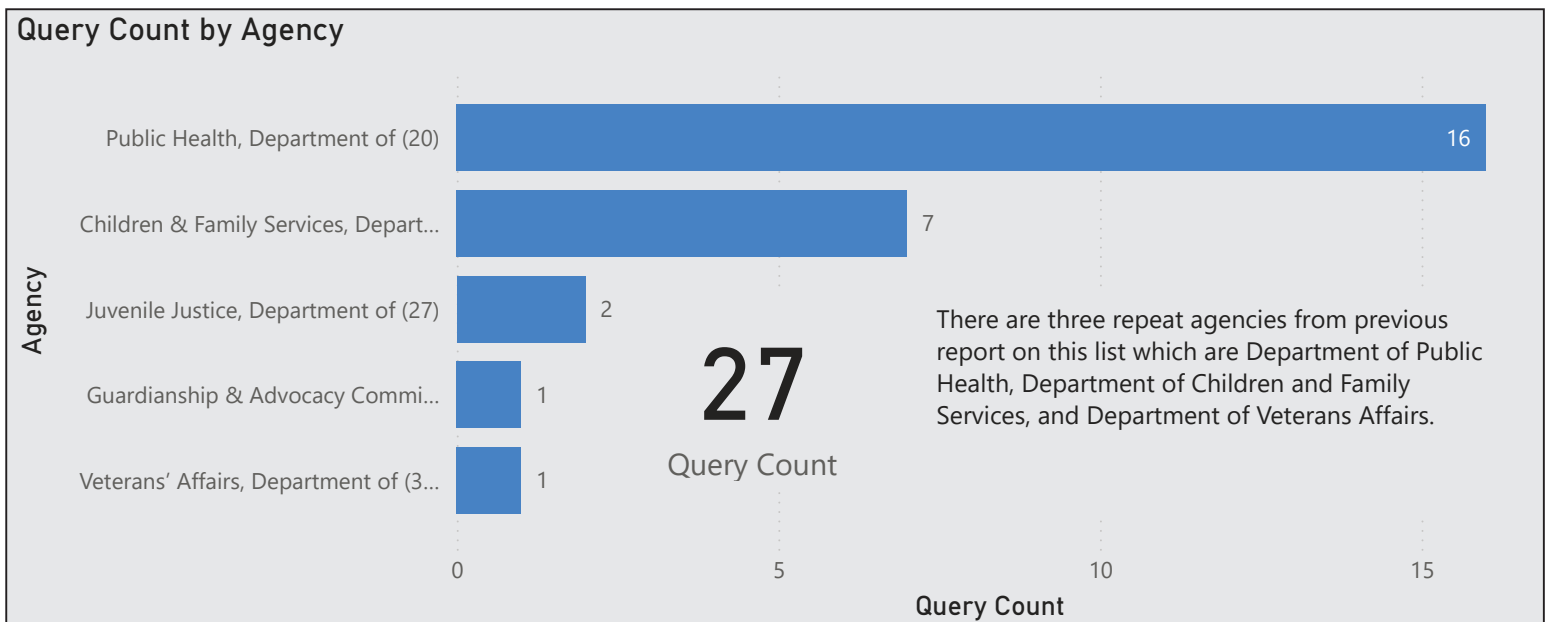
Employment Error Definitions:
Below is a list and definition of each employment error based on the resource sourced:

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 Department of Public Health had the highest errors at 16, followed by the Department Children & Family Services at seven (7) and the Department of Juvenile Justice at two (2). Across all five (5) agencies the query count ranged from 1 to 16.

Query Count by Agency

There are three repeat agencies from previous report on this list which are Department of Public Health, Department of Children and Family Services, and Department of Veterans Affairs.

The good news is we did not have any material hiring errors where the wrong employee was hired and started employment. 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.

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Denials by Query and Agency

The Personnel Compliance Office 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 78 requests from 14 agencies covering seven query types.

Bypass is consistently the highest denial at 47 which was significantly higher than Personal Services Contract were only one (1) was denied this reporting period. Across all seven (7) query types requests were denied between 1 and 47 times.

Requests Denied by by Query Types
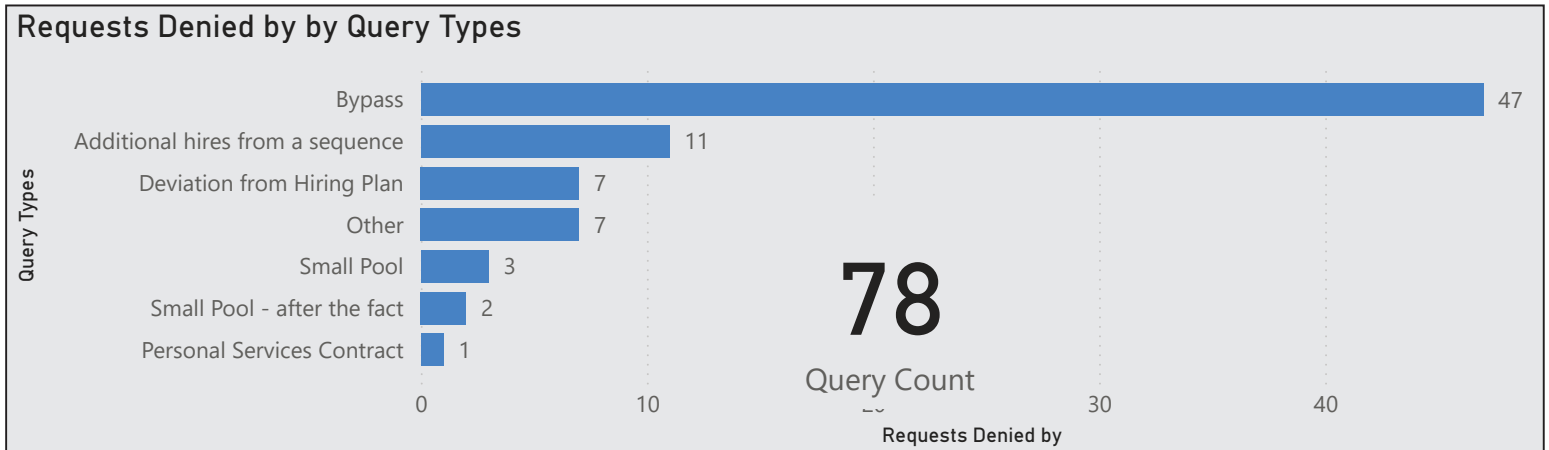
While the total denials of 78 was up from 51 during the last reporting period this still demonstrates a strong partnership between the agencies and Compliance, with most queries being resolved successfully because while our approval rate is high overall we work hard to get there.

The Department of Human Services received the most denials at 33 followed by the Department of Children and Family services at 10. Across all 14 agencies who received denials they ranged from 1 to 33.

Requests Denied by Agency
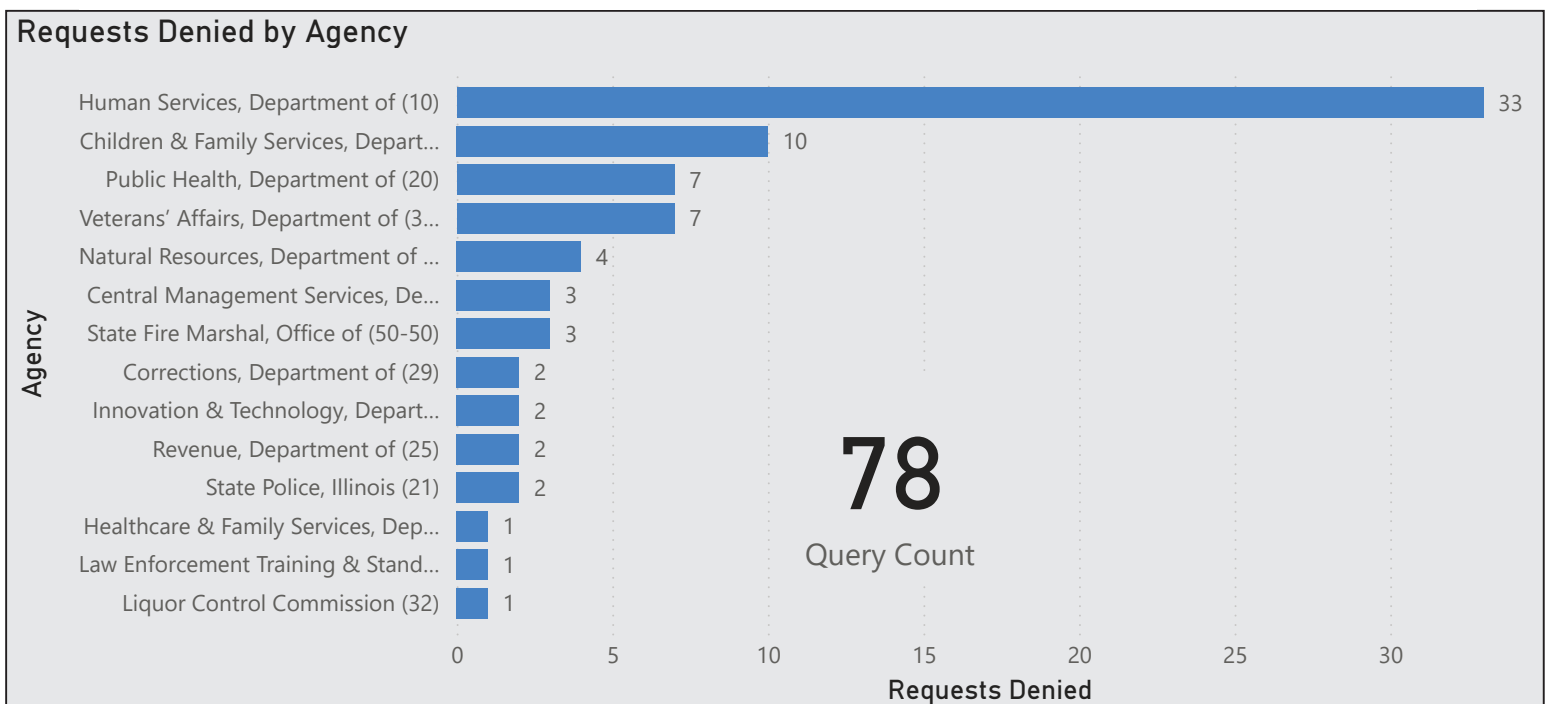
Political Compliance

Political Discrimination

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

- **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.

- **Incidents**: There were six incidents of political contact from four different agencies.
- **Details**: They came in the form of letters, resume, and calls.

Overall Political Compliance Summary
- **Political Discrimination**: No reports were filed, indicating effective adherence to anti-discrimination policies.
- **Political Contacts**: Six 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.

Total Per Agency by Reported by Agency

Type of Contact by Manner Of Contact
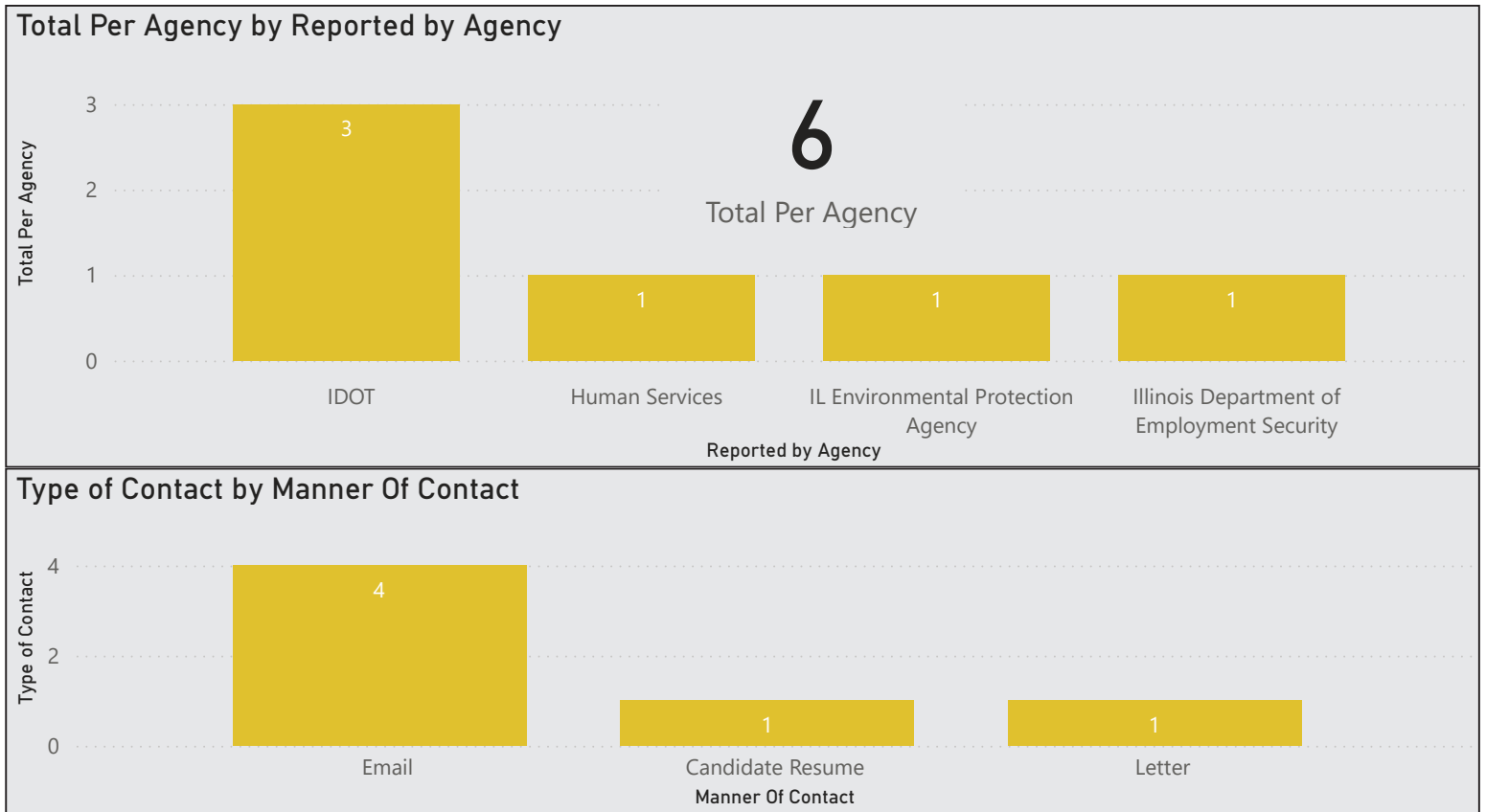
Agency Training and Customer Relations

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.

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 key documents during these visits includes:

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

Meeting Preparation

During this reporting period the Compliance team developed a slide deck that covers an analysis of data that is specific to each agency visit allowing the Agency Personnel Officer (APO) and staff to gain a deeper understanding of what is submitted. It also helps the compliance team tailor specific training messages to each agency. So whether or not 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 among updates on the compliance workbench and SharePoint submission system:

- denials,
- errors,
- utilization rate,
- query types submitted, and
- historical data

Overall, 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.

Accomplishments and Future Plans

Current Reporting Period
The Compliance Office completed 28 in-person or virtual agency site visit during the coverage period of this report. The following chart shows all site visits conducted and scheduled.

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

Summary
The Compliance Office's efforts to conduct in-person visits annually 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.

Agency	2025 Date	2024 Date	2023 Date	2022 Date	Notes
Abraham Lincoln Presidential Library and Museum		7/23			
Capital Development Board		8/13	3/30		
Criminal Justice Information Authority	1/14	11/20			
Department of Agriculture		9/25	1/18		
Department of Central Management Services		10/9	6/14		
Department of Children and Family Services	3/25			10/27	
Department of Commerce and Economic Opportunity	1/22				
Department of Corrections	2/19	10/16		7/12	
Department of Employment Security		11/21			
Department of Financial and Professional Regulation		8/14			
Department of Healthcare and Family Services		8/28			
Department of Human Rights					Invited 2025
Department of Human Services		11/7		5/5	
Department of Innovation and Technology		10/17	4/4		
Department of Insurance		8/27			
Department of Labor		8/20			
Department of the Lottery	2/26				
Department of Natural Resources		11/6			
Department of Public Health		9/17	8/22		
Department of Revenue		7/30			
Department of Transportation		10/15		8/10	
Department of Veterans' Affairs		6/13	3/1		
Department on Aging		11/12			
Emergency Management Agency		8/21	4/25		
Environmental Protection Agency		9/12			
Guardianship and Advocacy Commission		10/8			
Illinois Educational Labor Relations Board		10/31			
Illinois Gaming Board	5/20				
Illinois Labor Relations Board		10/30			
Illinois Racing Board		9/3			
Illinois State Police			3/30		Invited 24/25
Liquor Control Commission		7/30			
Office State Fire Marshal		9/30			
Property Tax Appeal Board		10/9			
State Employee Retirement System					Invited 2025
Totals	6	28	8	4	3

Compliance Training Projects Complete

Bypass Training
The team worked with the CMS Learning and Development team to develop a bypass training for all agencies. 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.

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Reports, Audits and HEM Responses

Quarterly Agency Personal Services Contract (PSC) Reports and CMS Compliance Audits – Per paragraph 70 of the CEP all agencies under the governors 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 past one year to ensure valid justification supports the hiring of a PSC. The CMS Chief Compliance Officer may require that a PSC that does not adhere to the CEP be ended.

Quarterly Agency Temporary Assignments (TA) and Interim Assignments (IA) Reports and CMS Compliance Audits – Per paragraph 60 of the CEP, all agencies under the governors 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 Temporary or Interim Assignment. The CMS Chief Compliance Officer may recommend that a Temporary Assignment or Interim Assignment that does not adhere to the CEP be ended.

Quarterly CMS Compliance Report to OEIG HEM – Per paragraph 28 and 96 of the CEP, the CMS Compliance Office 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.

Semi-Annual Compliance Report – Per paragraph 95 of the CEP, the CMS Compliance Office shall issue semi-annual reports on or around every March 15 and September 15 to the Governor's Office and the OEIG, 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 material Employment Hiring Errors; (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.

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

Annual Compliance Report – Per paragraph 97 of the CEP, the CMS Compliance Office will provide OEIG HEM an annual report and the Civil Service Commission a listing of all non-Code positions that do not appear on the Exempt List.

HEM Advisory Responses – However, there is a future plan to document all of the processes into standard operating procedures (SOP). That process began this reporting period as a response to 24-HEM-0036 when CMS Compliance was called upon to review scoring more closely and consider other ways the sequence may have been affected.

To support changes requested by 24-HEM-33 a mandatory field was added to the CMS Compliance Query Portal to require agencies to answer a yes or no to the sequence is being monitored by HEM. While this field was already in the request it was not previously mandatory but because an agency didn't check it when they should have it became mandatory.

Finally, we have always been aware that agencies were reporting competitively and non-competitively selected Personal Services Contract (PSC) employees. However, during the 3rd quarter reporting period we discovered one agency reporting one PSC multiple times and it was due to how they were being hired through procurement. We are working with that agency to get their future PSCs run through the CMS Compliance approval process which will then show up on the reports.

Contacts and Resources

For Questions about this report, please contact the Chief Compliance Officer:

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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://cms.illinois.gov/about/reports.html

The Team

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