



State of Illinois
Department of Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT

July 1, 2025 – December 31, 2025



Compliance Office
Bureau of Personnel
Central Management Services

CMS PERSONNEL COMPLIANCE SEM-ANNUAL REPORT

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Executive Summary

The reporting period for this Semi-Annual Compliance report covers July 1, 2025, through December 31, 2025. Everything within this report covers activities only handled and tracked by Illinois Department of Central Management Services (CMS) Bureau of Personnel (BoP) Compliance, although some Comprehensive Employment Plan (CEP) requirements have been transitioned to other CMS departments. According to the CEP Semi-Annual reporting requirement, there are five topics that must be covered in this report:

- (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.

Auditing Activities

A total of six audits were completed to maintain compliance with CEP paragraphs 60 and 70. Typically, ten 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.

Temporary Assignments (TA) and Interim Assignments (IA) – focusing on those that have lasted more than 120 days – to ensure that a valid justification supports the TA or IA. For definition purposes, a TA covers Bargaining Unit (BU) positions and IA cover merit compensation (MC) positions.

Total Audits	CY Time Frame	Audit Type	Employees Covered	Total Agencies Audited	Agencies Audited
2	Q1 & Q2 2025	TAs of BU Employees	20	9	DEC, DHS, DNR, DOC, DPH, HFS, REV, ELRB, and ISP
2	Q1 & Q2 2025	IAs of MC Employees	20	10	Aging, CMS, DCEO, DHS, DNR, DOC, DOT, EMA, HFS, IGB, and ISP

Personal Services Contracts (PSC) – focusing on those that have been extended past one year – to ensure that a valid justification supports the PSC.



Total Audits	CY Time Frame	Audit Type	Contractors Covered	Total Agencies Audited	Agencies Audited
2	Q1 & Q2 2025	PSC	20	10	AGR, CJIA, DES, DFPR, DHS, DNR, DPH, HFS, and 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 and potentially ended. Since this overall activity has shined a light on a variety of situations that should be ended 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, as 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, an Exempt List (EL) audit has been ongoing, working with the Office of Inspector General Hiring and Employment Monitoring Division (OEIG-HEM) and the Governor's Office, to ensure the list matches those positions previously approved either by statute or the Civil Service Commission. In November, this audit moved to a monthly task requiring a comparison between the EL and the intent to fill documentation approved by the Governor's Office.

Violations of the CEP

Violations are typically handled via denials and Employment Hiring Errors (EHE) submissions where Compliance Officer (CO)s 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. These are covered separately later in the report.

Remedial Action Recommended

After last period's increase in total MEHEs, the CMS BoP Compliance Team took this topic very seriously. As outlined in this document, there are numerous opportunities for agency HR staff to be more thoroughly trained in how their role is pivotal to CEP compliance, especially during site visits. Compliance worked with CMS BoP business partners such as HRT and Personnel Integrity to set up internal teams chats so they can notify the team as soon as an error is discovered to partner in a way to avoid an MEHE and minimize all EHEs overall. These efforts decreased overall EHEs by 42% from last reporting period.



Corrective Actions Taken by CMS

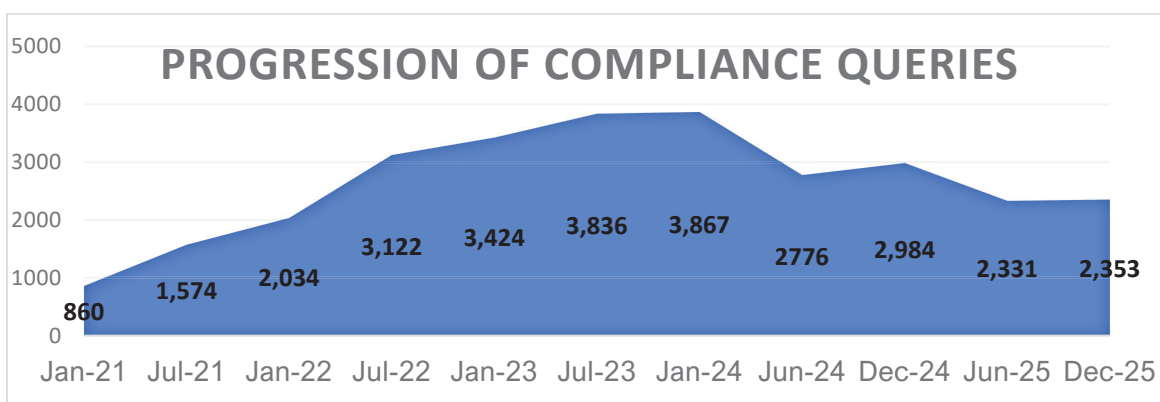
While this cycle has been a learning opportunity for the Chief Compliance Officer (CCO) as well as the entire CMS BoP Compliance Team, the previously mentioned corrective actions such as denials, agency warnings, and more detailed scrutinization will continue to be at the forefront of the activities.

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 they had the previous quarter and 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 2,353 compliance reviews from State agencies, boards, and commissions. That is up by approximately 1% from 2,331 compared to Jun '25 report. The last report mentioned HRT transition removing a significant scope of duties that Compliance was originally performing until January 2025. Just over 200 queries were processed in the first half of the year and an additional 98 during this period that closed as HRT. That is a total of 299 queries, attributed to the agencies still learning they did not have to submit those corresponding queries to Compliance. The total that would have come to us is unknown since there may have been more from those who learned about the transition quickly.

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



While the following pages go into detail about how the 2,353 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 has been 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, the CMS Project Management department 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

While this system is currently uni-directional, additional improvements are planned to allow agency access to their submissions as well as allowing approvals to roll into the position establishment system housed within the Personnel Integrity Division of BoP.

Additionally, the COs work closely with OEIG-HEM on Exempt PSC approval process. 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.

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.

Query Type	Count	Query Type	Count
Deviation from Hiring Plan	670	Guidance Only	59
Additional Hires	402	CEP49	27
Bypass	366	Employment Hiring Error	17
Personal Services Contract	331	Small Pool - after the fact	17
Small Pool	253	Exempt to Covered	13



Query Type	Count	Query Type	Count
Cancel/Repost	97	RDCOI Review	11
Other	87	Merit Comp Return	3

Deviation from Hiring Plan queries rose, surpassing Bypass, and increased over the last reporting period with a total of 670 for this reporting period (up from 497).

During a meeting held with the HRT Business partners early in the Summer, it was discovered that they had been handling emergency interview panel changes through the HRT leaders. As it was determined that this request should be still going to Compliance per CEP 28: “Once the Hiring Plan is approved by the Hiring Lead, approval is required from the CMS to adjust or deviate from the plan”, agencies were reminded to request those changes through Compliance, which may account for a significant portion of this uptick in subsequent requests for Deviation.

Additional Hires also surpassed Bypass this reporting period with 402, up from 294 in previous report. Bypass was down from 497 last report to 366 followed closely by Personal Service Contracts, down from 340 to 331 this period. Across all 14 query types, these four categories alone accounted for over half of all queries received. In contrast, queries like Merit Comp Return with three and Exempt to Covered with nine were minimal, indicating either resolved procedural issues or more consistent internal process.

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 Convert to Code, 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 hire 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 49 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.

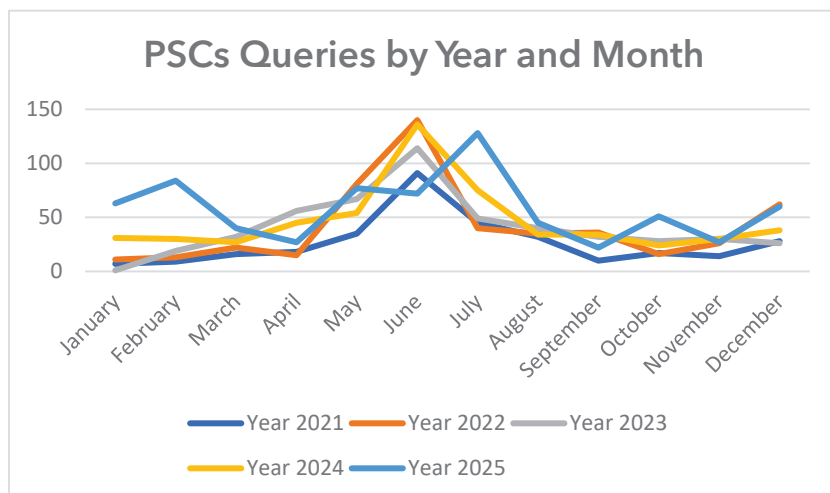
Bypass

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 Labor Relations and CMS Legal engage in extensive communication with the requesting agency to provide accurate and consistent responses.

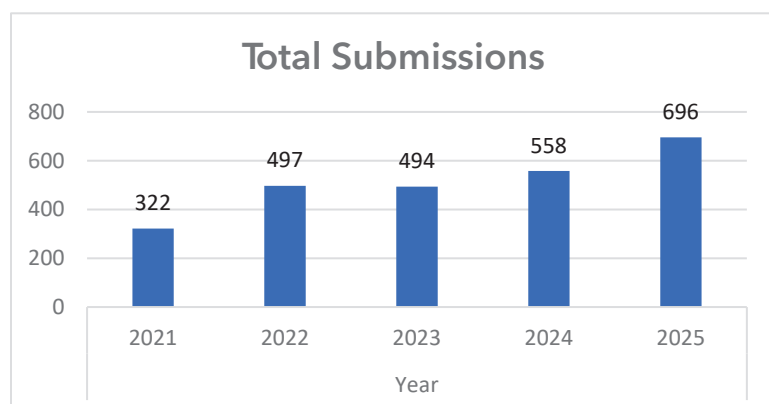
Personal Services Contracts

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 are 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, more so than they have been recently, which will be addressed on future site visits.



Another concern is the gradual increase in PSC submissions. 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.



Agency Breakdown of Compliance Activity

While a slightly smaller large agency, Department of Transportation, took over top compliance submissions at 414 above the largest agency Department of Human Services (343) this reporting period, the same five agencies at 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 (252), Department of Natural Resources (205), and Department of Children and Family Services (135).

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

Agency	Total Queries	Agency	Total Queries
Department of Transportation	414	Abraham Lincoln Presidential Library and Museum	17
Department of Human Services	343	Department of Early Childhood	16
Department of Corrections	252	Illinois Prisoner Review Board	15
Department of Natural Resources	205	Department of Human Rights	14
Department of Children and Family Services	135	Department of Insurance	14
Department of Veterans' Affairs	113	Illinois Educational Labor Relations Board	14
Department of Juvenile Justice	78	Department of Employment Security	12
Department of Public Health	76	Capital Development Board	10
Department of Central Management Services	67	Department on Aging	10
Department of Innovation and Technology	62	Department of Labor	9
Department of Commerce and Economic Opportunity	61	Department of Military Affairs	7
Illinois State Police	57	Illinois Racing Board	7
Department of Healthcare and Family Services	54	Illinois Law Enforcement Training and Standards Board	6
Department of Agriculture	50	Illinois Workers' Compensation Commission	6
Department of Financial and Professional Regulation	44	Property Tax Appeal Board	6



Agency	Total Queries	Agency	Total Queries
Illinois Gaming Board	40	Guardianship and Advocacy Commission	4
Criminal Justice Information Authority	30	State Employee Retirement System	4
Office State Fire Marshal	27	Liquor Control Commission	3
Emergency Management Agency	23	Department of the Lottery	2
Environmental Protection Agency	22	Sentencing Policy Advisory Council	2
Department of Revenue	21	Illinois Deaf and Hard of Hearing Commission	1

Employment Hiring Errors

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 61 EHEs, which has decreased by 42% from the first half of the year. The last reporting period emphasized a need for training about what an EHE is and how to avoid them. The Compliance Team started to focus on this topic with more vigor 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. The department 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 17 such errors were reported during this period (down from 46 in the first half of year), 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, 17 CEP P49 violations were reported, which is down significantly from last reporting period when it was 78. 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 or 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, with ten which is unusual for an agency their size. They have recently experienced a great deal of staff turnover which may be contributing to these errors.



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 17 other EHEs in addition to those explained above, a decrease from 20 in the previous period.

As shown in the chart below, the Department of Human Services rose to the top with four submissions, which was the same amount they reported last period. At least half of these errors were a result of the wrong eligibility list being supplied to them by CMS.

The highest individual agency count in the last period was 16, which means that agency deserves a commendation for significant improvement. The last two reports highest count was DPH who is missing from the list below because they obviously have been focusing on improving their hiring processes, having zero errors in this period.

Agency	Submitted	EHE	Small Pool ATF	CEP49
Department of Veterans' Affairs	11	1	0	10
Department of Agriculture	10	3	0	7
Department of Transportation	8	1	7	0
Department of Corrections	6	1	5	0
Department of Human Services	4	4	0	0
Department of Commerce and Economic Opportunity	4	0	0	4
Department of Juvenile Justice	3	0	3	0
Illinois State Police	3	0	1	2
Department of Children and Family Services	2	1	0	1
Department of Human Rights	2	2	0	0
Department of Natural Resources	2	1	0	1
Department on Aging	2	0	0	2
Abraham Lincoln Presidential Library and Museum	1	1	0	0
Department of Central Management Services	1	1	0	0
Department of Early Childhood	1	1	0	0
Department of Financial and Professional Regulation	1	0	1	0
Totals Submitted and Per Error	61	17	17	27

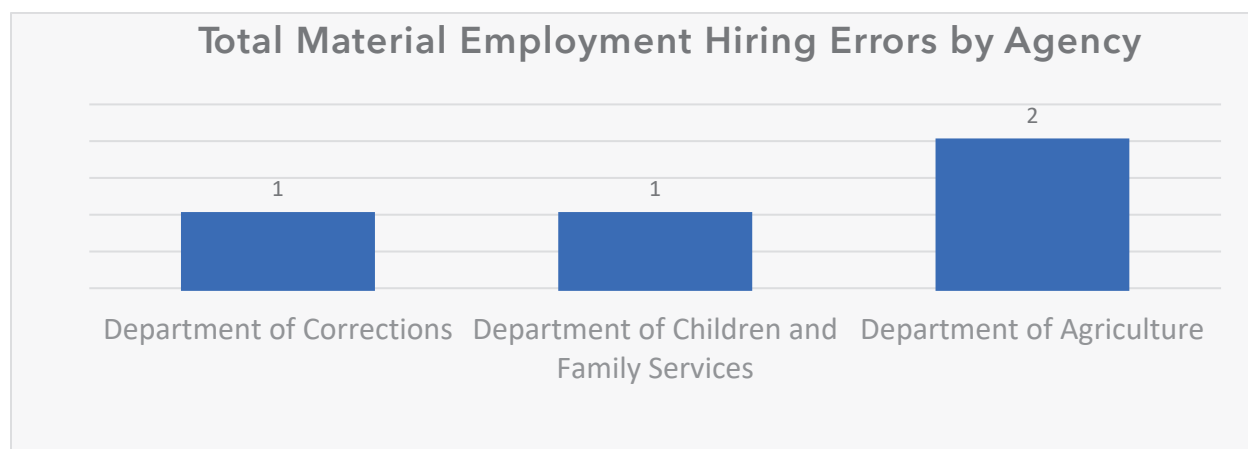


Notably, the following list of agencies appeared in both this and the previous reporting period. Their reappearance highlights the need for targeted retraining during their next site visit, particularly in documenting and executing required CEP steps.

- Departments of Natural Resources,
- Department of Juvenile Justice
- Department of Agriculture
- Department of Children and Family Services
- Department of Corrections
- Department of Commerce and Economic Opportunity

Material Employment Hiring Errors

Overall MEHEs decreased both by one error statewide and by one agency which made excellent progress in just six months. Last reporting period had five total MEHEs from four different agencies. This time there were four total MEHE's from three different agencies.



An additional segment to the definition was also discovered during this period. An MEHE is defined as situations where the wrong candidate was hired and began employment, or the right candidate was hired in the wrong way. Both are violations of CEP policy. During this reporting period, all four situations were related to the wrong person being hired. Once Compliance became aware, these errors were promptly addressed in collaboration with the agencies involved. Corrective actions included a full review of the hiring process and procedural coaching to prevent recurrence.

As shown in the chart above, three agencies submitted these errors. The Department of Agriculture accounted for the highest number with two MEHEs although both were due to CMS confirming the approved bid report in error. Keep in mind the bid report is created by the agency initially, so this process is a partnership between agency and CMS. Two employees were hired and started in the position prior to catching the error and were sent back to previous state jobs so the correct candidates could be hired. Both errors were on the same requisition. One of the wrong candidates hired answered “yes” to being a



State certified employee when they were not, which partially led to incorrect bid records being prepared and approved.

Department of Corrections and Department of Children and Family Services each had one material hiring error. The Department of Corrections error was related to another bid record error. The latter was due to a candidate's name change who was moved to Other Means when they should have had contractual rights had the name change been acknowledged at the time the bid record was prepared and approved. In the latter case, an additional hire was requested to keep the incorrect person hired in addition to hiring the candidate with the name change.



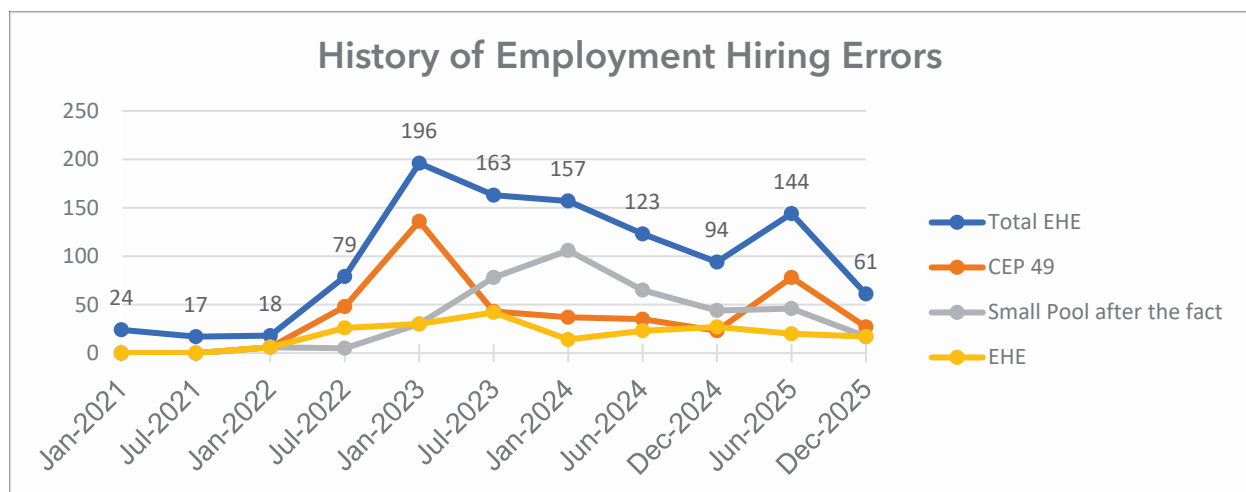
The data above provides a broader historical view of MEHEs across reporting cycles. While the overall number remains low out of a total of 61 errors, the timing of the reemergence alongside increased total EHEs in 2025 highlights the need for continued oversight and targeted training in specific agencies.

Historical Perspective of Employment Hiring

The chart below shows a historical view of total EHEs, broken down by type and reported over eleven cycles from January 2021 through December 2025. This includes all EHEs, SPATF, CEP 49 violations, and the total count across all categories.

Across this timeline, a sharp increase occurred between July 2022 and January 2023, with total EHEs peaking at 196, a significant rise from 79 in the prior period. This spike was primarily due to widespread violations by CEP 49 with 136 errors reported. Following this peak, there is a gradual decline through December 2024, suggesting that corrective efforts may have had an impact. However, a new uptick in the last period (144 total EHEs) indicates that further monitoring remains necessary, which was why there has been a strong focus on this topic on Compliance among all business partners at agencies and CMS. It is hopeful that the downturn in this period is a result of that emphasis.





The chart below gives specific numbers graphed above, which also includes MEHEs included in section above.

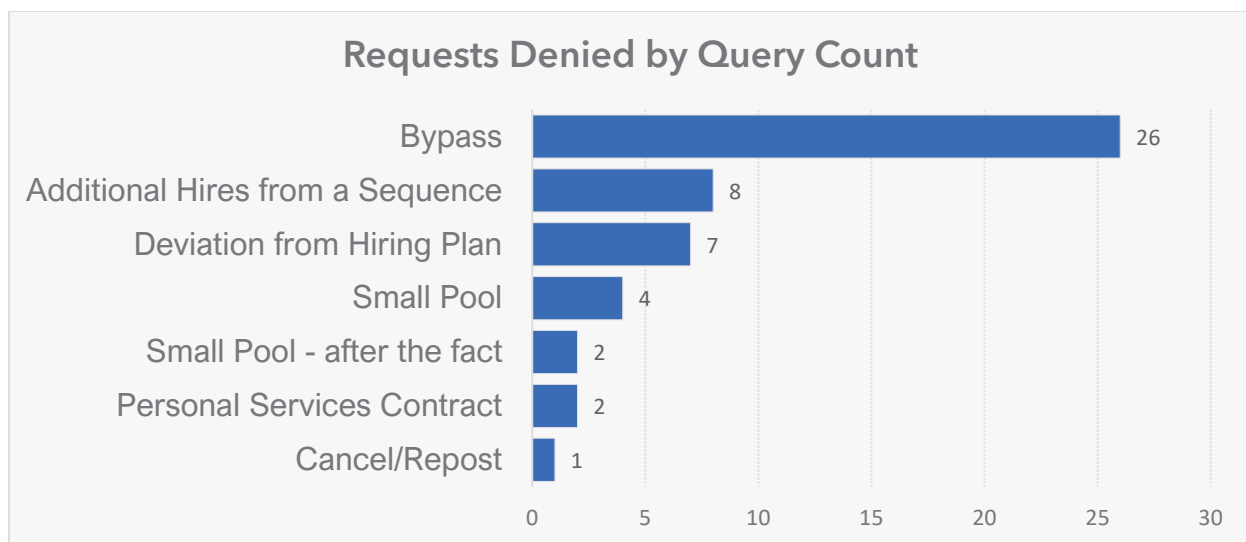
Type of Error	Jan-21	Jul-21	Jan-22	Jul-22	Jan-23	Jul-23	Jan-24	Jun-24	Dec-24	Jun-25	Dec-25
EHE	-	-	6	26	30	42	14	23	27	20	17
SPATF	-	-	6	5	30	78	106	65	44	46	17
CEP 49	-	-	6	48	136	43	37	35	23	78	27
Total EHE	24	17	18	79	196	163	157	123	94	144	61
MEHEs	2	4	0	1	0	0	0	0	0	5	4

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 50 requests from 14 agencies covering seven query types.

Bypass is consistently the highest denial at 26, which was significantly higher than Cancel/Repost where only one was denied this reporting period. Across all query types, the number of denials ranges between one and 26.





The total denials of 50 was down from 70 during the last reporting period. This could demonstrate a strong partnership between the agencies and Personnel Compliance. While the approval rate is high overall, COs work hard to help agencies to get approval, especially when their request is in the best interest of the agency and the State overall. It could also mean agencies have not had to submit, because they are making improvements in their own processes.

The Department of Human Services and Children and Family Services are consistent with last reporting period having the most denials of all agencies followed closely by CMS. Across all 16 agencies (up from 13 last report) who received denials, individual agency figures for denials ranged between one and 15.

Agency	Total Queries	Bypass	Cancel- Repost	Deviation from HP	PSC	Small Pool	SPATF	Additional Hires
Department of Human Services	15	13	0	2	0	0	0	0
Department of Children and Family Services	9	5	0	1	0	0	0	3
Department of Central Management Services	8	3	1	1	0	0	0	3
Department of Transportation	4	1	0	1	0	1	1	0
Department of Natural Resources	3	2	0	0	0	0	0	1
Department of Commerce and Economic Opportunity	1	0	0	1	0	0	0	0



Agency	Total Queries	Bypass	Cancel-Repост	Deviation from HP	PSC	Small Pool	SPATF	Additional Hires
Department of Financial and Professional Regulation	1	0	0	0	0	0	1	0
Department of Human Rights	1	0	0	0	0	1	0	0
Department of Innovation and Technology	1	1	0	0	0	0	0	0
Department of Insurance	1	0	0	0	0	0	0	1
Department of Revenue	1	0	0	0	1	0	0	0
Department of Veterans' Affairs	1	1	0	0	0	0	0	0
Emergency Management Agency	1	0	0	1	0	0	0	0
Illinois Deaf and Hard of Hearing Commission	1	0	0	0	1	0	0	0
Illinois Gaming Board	1	0	0	0	0	1	0	0
Illinois State Police	1	0	0	0	0	1	0	0
Total	50	26	1	7	2	4	2	8

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

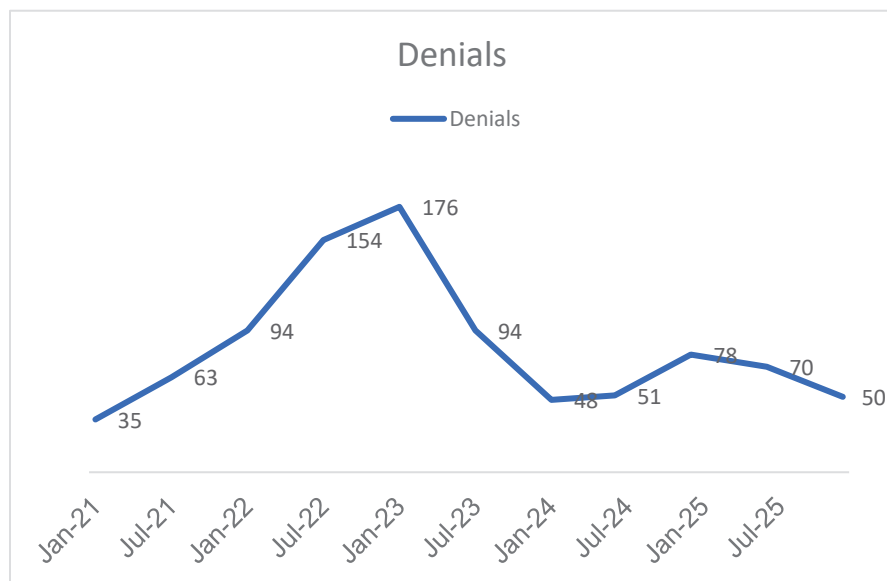
Historical Perspective of Denials

Historically, denials have remained consistent except for a couple upticks over time. In 2022 the denials rose to more than double the average of 65 with the two highest time periods removed. That was a year of major change related to the hiring process moving from the legacy paper-based system to the new SuccessFactors system. Agencies were learning a new system, new processes, and trying to apply the CEP rules. Also, a major change related to conviction records was enacted into law by IDHR affecting the way the Bypass query was handled. The chart and graph below show the total denials over time.



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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



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 changes implemented. Those that are bolded below are still potential denials even if they have not been used recently. Out of over 913 denials since the inception of the CEP 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 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	Dec-25	Jun-25	Dec-24	Jun-24	Jan-24	Jul-23	Jan-23	Jul-22	Jan-22	Jul-21	Jan-21	Total Denials Per Type
Additional Hires	8	9	11	6	1	2	0	0	0	0	0	37
Bypass	26	42	47	21	29	32	44	50	28	23	10	352
Cancel	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	1	0	0	1
Cancel/Repost	1	3	0	5	4	7	7	15	10	0	1	53
COI	0	0	0	0	0	0	11	13	0	0	2	26
Conflict of Interest	0	0	0	0	0	0	0	0	5	11	0	16
Deviation from HP	7	6	7	5	6	17	30	16	18	7	0	119
EHE	0	0	0	0	1	0	5	5	0	0	0	11
Exempt to Covered	0	0	0	0	0	0	1	0	0	0	0	1



Denial Types Used Since 2021	Dec-25	Jun-25	Dec-24	Jun-24	Jan-24	Jul-23	Jan-23	Jul-22	Jan-22	Jul-21	Jan-21	Total Denials Per Type
Hire Below Minimum Score	0	0	0	0	0	0	0	0	0	0	2	2
MC Return	0	1	0	0	0	0	0	0	0	0	0	1
Other	0	6	7	8	2	12	39	17	13	12	4	120
Out of Sangamon County	0	0	0	0	0	1	2	6	3	0	0	12
Out of State	0	0	0	0	0	0	1	6	1	1	0	9
Political Contact	0	0	0	0	0	0	1	0	0	0	0	1
PSC	2	1	1	2	3	3	24	8	0	0	16	60
Small Pool	4	0	3	2	1	12	11	14	12	9	0	68
Small Pool ATF	2	2	2	2	1	8	0	0	0	0	0	17
Term Renewal	0	0	0	0	0	0	0	1	0	0	0	1
Total Denials Per Report	50	70	78	51	48	94	176	154	94	63	35	913

Political Compliance

Considering the recent HEM Advisory 25-HEM-00037 issued prior to this reporting period in late June 2025, an analysis was conducted to evaluate all political contact reports since inception in 2021. There has been a total of 106 reports to CMS Personnel Compliance between 2021-2025. During this reporting period the total number of reports was 27. That is more than double what was reported during the last report and about 26% of the total reported for the entirety of this requirement outlined in the CEP. As a result of this focus, this topic has been a training focus during the annual site visits beginning in the Fall of 2025.

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 106 reports since inception of the reporting system in 2021.

Political Contacts

Only two agencies reported 27 political contacts during this period, which was up over 50% from last report of 11 from four agencies. While the Compliance team has been focusing on reminding HR departments of their CEP reporting responsibility since last Fall,



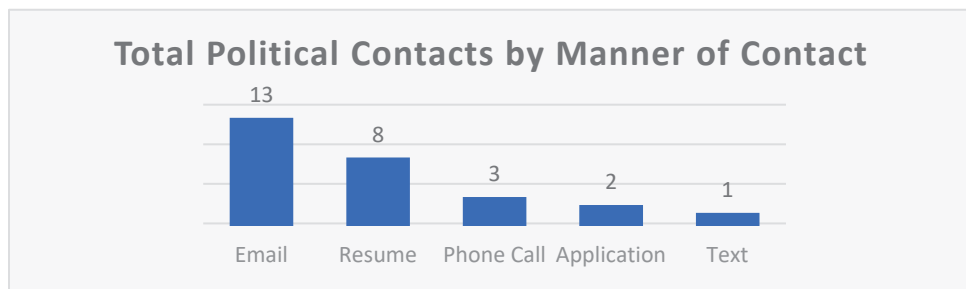
it's being reported to the compliance team that agencies don't have any politicians reaching out about hiring. It is assumed the communications and legislative partners are doing a good job of making it known that political influence around non-Exempt hiring is not acceptable.

Agencies	#
Department of Human Services	11
Department of Transportation	16



The most common method of political contact was email, whereas last reporting period was via resume. 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 inquiring about a candidate's hiring status. The additional breakdown is charted below.

Manner of Contact	#
Email	13
Resume	8
Phone Call	3
Application	2
Text	1



Over half, or 63%, of these reports involved inappropriate contacts and the majority were asking about specific positions or types related to a constituent candidate. The remaining two were asking about an employee's termination or pay. All involved prohibited information which cannot be shared.

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 back up to where they were when the CEP was published and reporting began in 2021. While numbers are up slightly from the initial year, the added focus this year can only help since they fell to an all-time low in 2024 with only nine reports.



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



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 than the standard due to the following:

- 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 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
Department of Human Rights	14	5.93	Illinois Law Enforcement Training and Standards Board	6	1.83
Department on Aging	10	4.20	Department of Labor	9	1.78
Department of Veterans' Affairs	112	3.51	Department of Transportation	414	1.72
Sentencing Policy Advisory Council	2	3.50	Department of Revenue	21	1.71
Illinois Prisoner Review Board	15	3.40	Illinois Gaming Board	39	1.69
Illinois Educational Labor Relations Board	14	3.29	Department of Employment Security	12	1.67



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Agency	TTL Queries	Average Days to Close	Agency	TTL Queries	Average Days to Close
Illinois Deaf and Hard of Hearing Commission	1	3.00	Department of Innovation and Technology	62	1.65
Department of Children and Family Services	134	2.84	Criminal Justice Information Authority	30	1.63
Illinois State Police	57	2.81	Department of Corrections	251	1.62
Department of Healthcare and Family Services	53	2.62	Department of Agriculture	50	1.62
Abraham Lincoln Presidential Library and Museum	17	2.29	Capital Development Board	10	1.60
Central Management Services	66	2.29	Illinois Racing Board	7	1.57
Emergency Management Agency	22	2.27	Department of Natural Resources	205	1.53
Office State Fire Marshal	27	2.15	Property Tax Appeal Board	6	1.50
Department of the Lottery	2	2.00	Environmental Protection Agency	22	1.41
Liquor Control Commission	3	2.00	Financial and Professional Regulation	44	1.34
Department of Human Services	343	2.00	Department of Insurance	14	1.21
Commerce and Economic Opportunity	61	1.98	Illinois Workers' Compensation Commission	6	1.17
Department of Public Health	76	1.97	Department of Military Affairs	7	1.14
Department of Early Childhood	16	1.88	Guardianship and Advocacy Commission	4	1.00
Department of Juvenile Justice	78	1.85	State Employee Retirement System	4	1.00



Overall, among all agencies this period, average response time is up slightly from 1.96 calendar days to now 2.01, which is still less than what it was in 2024. While Compliance had three agencies hit the 2.0 targeted time frame, 25 were below target at 1.98 days or less and only 14 were above the threshold, which was often due to case complexity or follow-up requirements.

To help keep this goal in mind, each CO can track their own days to close on the assigned queries. Out of the 2,353 total queries handled this reporting period, each CO was assigned between 395-875 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 of 1.89 – 2.23 days to close which is on par with 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 such as Labor or Legal or waiting in 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 that is 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.



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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, 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

While the Compliance team completed 22 site visits in this period, 50 were completed in 2025, which is the most the team has ever completed in one fiscal or calendar year.

Agency	Date
Criminal Justice Information Authority	1/14
Capital Development Board	11/26
Commission on Equity and Inclusion	4/22
Department of Agriculture	11/24
Department of Children and Family Services	3/25
Department of Commerce and Economic Opportunity	1/22
Department of Corrections	2/19
Department of Employment Security	12/15
Department of Financial and Professional Regulation	11/17
Department of Healthcare and Family Services	8/26
Department of Human Rights	3/24
Department of Human Services	12/9
Department of Innovation and Technology	12/8
Department of Insurance	11/13
Department of Juvenile Justice	5/27
Department of Labor	11/19
Department of Military Affairs	4/22
Department of Natural Resources	12/1
Department of Public Health	11/25
Department of Revenue	12/2
Department of the Lottery	2/26
Department of Veterans' Affairs	5/21
Department on Aging	12/18



Agency	Date
Emergency Management Agency	12/16
Environmental Protection Agency	11/18
Executive Ethics Commission	5/14
Human Rights Commission	4/30
Illinois Arts Council	4/8
Illinois Civil Service Commission	4/2
Illinois Commerce Commission	6/10
Illinois Council on Developmental Disabilities	6/4
Illinois Deaf and Hard of Hearing Commission	8/19
Illinois Educational Labor Relations Board	12/10
Illinois Gaming Board	5/20
Illinois Independent Tax Tribunal	4/29
Illinois Labor Relations Board	12/5
Illinois Law Enforcement Training and Standards Board	5/14
Illinois Power Agency	5/27
Illinois Prisoner Review Board	4/23
Illinois Racing Board	11/18
Illinois State Police	6/17
Illinois Workers' Compensation Commission	4/29
Liquor Control Commission	11/20
Office State Fire Marshal	11/25
Pollution Control Board	5/13
Property Tax Appeal Board	12/2
Sentencing Policy Advisory Council	4/2
State Employee Retirement System	2/25
State Police Merit Board	6/24
Torture Inquiry and Relief Commission	4/30

Accomplishments

The last six months of 2025 were just as productive and busy as the first half starting with the implementation of way to honor agencies and internal business partners as well as a trip to Chicago to meet the agency partners in person for the first time.

Traveling Trophy

The most exciting accomplishment is the implementation of two ways the Compliance team is now celebrating the partners! The Compliance team works so closely with agency partners and internal CMS business partners, and while my predecessor authored this idea, the current CCO had to put it into action. During the first half of the year, the CCO conducted an audit of all reports submitted since inception of the department and created an inventory discovering that there were seven agencies that submitted their quarterly



CEP TA reports without being prompted by CMS Compliance. No reminders had to go out to them at all, which is a huge relief to all of us! That was what prompted the initial monthly traveling trophy celebrations. Shortly after, the Compliance team began celebrating internal business partners who always steadfastly support us, respond timely, and are easy to work with to accomplish the goals of the CEP. These trophies are traveling and presented monthly as time allows.



DIO APO turns trophy over to Ag – Chief Project Manager turns over trophy to HRT Manager

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.

Chicago Meet and Greet

The Compliance Team along with their summer intern traveled to Chicago July 15-16 to meet and greet all the HR staff at agencies who did not have a presence in Springfield. This was the first in person meeting as previous site visits with these agencies were virtual. Three meetings were planned in three different buildings with the final visit at the request of an agency at a fourth building. Fourteen (14) Agencies invited to participate with almost 100% attendance: CEI, DES, DHR, ELRB, HFS, HRC, IAC, ICIJ, IPA, IRB, ITT, SPAC, TIRC, and WCC.



CO Training for Intern and PSC

The Compliance team hosted a first ever Compliance intern who participated in several projects to include semi-annual report improvements, consolidating old files, and setting up file naming conventions. This required individual and team training throughout the month of July.



In addition, the team hosted their very first PSC due to planned CO leave of absence. This also required individual and team training with the contractor primarily during the month of August.

Both individuals contributed immensely to the operations of the department, allowing the team to accomplish several improvement projects during their tenure.

Emerging Leaders Compliance Training

While the team did a meet and greet in July, they were later asked to present virtual training to Emerging Leaders from across the state on the following topics in September:

- Where Compliance Fits Into Hiring
- Political Contact Reporting
- Exempt Establishment
- Exempt List
- Employment Hiring Errors
- Bypass
- PSCs
- CEP Reporting
- Auditing & Record Keeping

Compliance Update to HR Director Quarterly in Person Meeting

The CCO provided a quick Compliance Update for HR Directors Meeting in July.

Annual HR Training Reviews

The compliance team that worked with the HRT training leads to reviewing and editing the following updates:

- HR Compliance Bypass Request Training
- 2026 Interviewer Certification
- 2026 HR Staff Duty of Confidentiality
- 2026 SME Review
- 2026 Relationship Disclosure Conflict of Interest

Just in Time Agency Training

CEP Reports Submission training was the most popular one-on-one agency requested training which included meeting requests with CMS, IPA, DJJ, DOC, EMA, ELRB, ILETSB and IDOT. This covered the report SharePoint submission process while demonstrating how to complete both the report review and update and certification. This was primarily due to the implementation of the IA/TA SharePoint submission system that began with Q2 of 2025 due July 15th. Although the PSC submission system was implemented with Q4 of 2024, the above training also included training on that topic as well not only for reporting but for approval submission on PSCs.



Reports, Audits and HEM Responses

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
Chief Compliance Officer (CCO), Department of Personnel Compliance
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

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: Amy Gurnitz, Julie Brightwell, Shawn Wilson and Donna Skowronski

