



Elizabeth Oplawski, Director of Compliance (DOC) for the Cook County Assessor's Office (AO), respectfully submits this Semi-Annual Report pursuant to Section V(B) of the [Employment Plan](#). As required, this Semi-Annual report will also be posted and made publicly available on the AO's [website](#).

I. Introduction

This Semi-Annual Report covers compliance activities at the AO from March 1, 2023 through August 30, 2023 and includes activities conducted by the DOC and/or the Compliance Analyst. Our role ensures the compliance with the Employment Plan and Employee Handbook and that Unlawful Political Discrimination does not occur in any employment actions or practices except for exempt positions at the AO. Monitoring employment activities in real time or audit activities reveal that the AO maintains compliance and as the DOC, the durable remedy described and certified to the Court continues. While independent in exercising our duties, we frequently collaborate with members of the AO staff as well as participate in standing meetings with Supervisory, HR and executive staffs to discuss compliance related matters.

During this reporting period, the DOC monitored 21 hiring sequences for *Shakman*-covered positions. There were 3 sequences that began last reporting period or involved additional hirings from Ranking Lists, 7 were begun and completed during this reporting period, and 11 new sequences started that are expected to conclude in the next reporting period. Additionally, the AO completed hires into 4 *Shakman*-exempt positions. These hires require review of position descriptions and candidate qualifications by the DOC. Under the current administration there have been no findings of unlawful political discrimination. In this reporting period, no investigations involving AO staff have been reported by the OIIG or conducted by the DOC.

II. Reporting and Collaboration

A. Periodic Reports

The DOC submits bi-weekly reports to the Assessor and key personnel at the AO outlining compliance activities, recommendations and corrective action suggestions. Additionally, the reports highlight efforts from staff to work collaboratively with the DOC. The concerns raised in these reports during this period are more technical than substantive in nature.

B. Standing Meetings

Various standing meetings between the DOC, Assessor and Deputy Assessor as well as the Deputy of HR and Legal address any compliance concerns or initiatives related to the Plan and Handbook. The DOC meets bi-monthly with Supervisors to collaborate and discuss various compliance topics that may warrant attention, respond to questions and provide an opportunity for HR to weigh in on the topics as well.

C. Hiring Status



With a significantly enhanced HR staff, including 3 new Senior HR Generalists¹ and a Director of Recruitment, completing hiring sequences more quickly is noted. As this additional staff becomes familiar with Plan and Handbook requirements, efficiencies should be realized when multiple sequences can roll through the processes more fluidly. Intake Meetings provide an opportunity to discuss hiring issues such as minimum and preferred qualifications, interview questions, scheduling and the position description. This process is becoming more streamlined as familiarity with the process results in less substantive (unless necessary) discussion and more of an opportunity for a final check to ensure HR and the hiring department are on the same page regarding hiring expectations.

D. *Performance Management*

The AO begins the 2023 annual performance evaluation cycle on September 1 which ends December 15, 2023. The app, also used for the 90 and 180-day evaluations, was updated to ensure that processes for performance management are compliant with the Handbook provisions. HR worked with Compliance to revise the deadline notice for Supervisors regarding the 90- and 180-day evaluations to ensure timely completion. Compliance anticipates HR will lead the annual process ensuring timely completion and troubleshooting technical issues that may arise with IT, while Compliance monitors both HR and the departmental activities from a compliance perspective.

III. **Role of the DOC**

The DOC's primary responsibilities are outlined in Article V of the Plan and include, but are not limited to, the following categories:

A. *Understanding the Assessor's Office's organization, its business, operational objectives and needs, and its staffing needs*

The DOC continues to meet with the Assessor and key staff to discuss compliance matters and understand the AO's organizational and operational needs. Any compliance recommendations either through monitoring or observations are more meaningful as a result of these discussions.

B. *Overseeing Compliance with Employee Handbook Policies*

1. **Handbook Revisions**

The Handbook provides a blueprint for a fair and equitable application of policies, recognizes the public service aspect of the office, protects the integrity of *Shakman* compliance, and provide a clearer path regarding consequences. Compliance reviews and provides input on revisions to the Handbook when appropriate. There were no revisions to the Handbook during this reporting period.

¹ In July, 1 of the 3 hires left the AO and was replaced by a Candidate on the Ranking List, who started in mid-August, maintaining a total at 5 Sr HR Generalists.



2. Time and Attendance

The AO continues to demonstrate compliance with the time and attendance policies. Issues noted involve technical infractions rather than substantive issues, and the frequency of these concerns continues to decrease. The DOC is engaged with HRs activities and provides feedback as needed.

3. Discipline

During this reporting period, the DOC saw improvements in the quality of Supervisors' requests for discipline and HR's role in the process of 4 total investigations. However, reducing the length of time to complete investigations is anticipated as the HR staff becomes more proficient in their responsibilities. Two employees received progressive discipline and two additional employees were terminated due to the serious nature of the infractions. None of the disciplinary matters during this reporting period raised any compliance concerns.

4. Notices of Employment Action

Notices of Employment Action (NEAs) are the method by which the AO documents and notifies the DOC of *Shakman*-related employment actions and are generally timely and accurate.

5. Grievances

The DOC monitors grievances and has not noted any substantial compliance concerns in the manner in which these meetings are conducted.

- C. *Actively working with the Deputy of HR in developing strategies for the Plan as well as necessary Policies and Procedures to ensure compliance with the Plan.*

The DOC works with the Deputy of HR and Legal staff developing strategies and policies that not only ensure compliance with the Plan and the Handbook but are legally compliant. Minor, but meaningful revisions to the Plan and forms to improve efficiencies, particularly with hiring, are expected to have a late September 2023 effective date.

- D. *Accepting, Investigating, and reporting on complaints related to the Employment Plan.*

There have been no referrals, DOC or OIIG investigations during the reporting period related to violations of the Employment Plan.

- E. *Reviewing Position Descriptions and Notices of Job Opportunities and taking appropriate steps to assure their accuracy.*

Organizational changes have resulted in creating new or revising existing position descriptions to reflect accurate reporting structures, appropriate minimum and/or preferred qualifications, and alignment vertically and horizontally among positions in the department and across the entire AO. While the AO is



receptive to the DOC's recommendations, and progress is being made, greater efficiencies could be realized when consistencies in items like title/pay grade; title/minimum or preferred qualifications are utilized, if appropriate.

- F. *Working with HR to implement training programs, prepare training materials, and conduct training for all employees on the Employment Plan and other policies.*

The DOC collaborates with the Director of Learning and Development for training on Plan and Handbook topics and is available to provide feedback on other topics. The Director of Learning also provides timely training records and ensures new hires are appropriately enrolled in LMS in order to ensure *Shakman* related training is completed. There have been no substantial compliance concerns with training or reporting.

- G. *Making recommendations to the Assessor and Department heads to eliminate and remedy instances of noncompliance with the Employment Plan, and Unlawful Political Discrimination or Unlawful Political Contact.*

During this reporting period, while the Plan's execution was not always perfect, none rise to the level of unlawful political discrimination or unlawful political contact. These are technical or inadvertent instances. The standard is not perfection but rather constitutionally adequate, and the AO continue to meet that standard. The DOC communicates ways to improve compliance for AO staff.

- H. *Monitoring activities pertaining to the employment of Shakman covered positions, including but not limited to, participating in validation, interviews, and candidate selection meetings.*

1. General Hiring Process

Three new Sr HR Generalists and the hire of the Director of HR occurred late in the last reporting period. One of the new Generalists left the office, and a hire from the Ranking List was completed with her onboarding near the end of this reporting period. Despite some minor gaps in the flow of hiring sequences, the larger staff demonstrated greater bandwidth to facilitate more efficient hiring to meet the needs of the AO. Greater familiarity with processes will likely result in further efficiencies.

The DOC monitored activity in 16 general hiring processes. One involved a hire from a Ranking List created during the last reporting period and 15 were completely new. Of the new sequences, 7 were started and completed during this reporting period, with an average completion time of 81 days from the job posting to the Candidate onboarding date². Of the remaining 8, intake meetings have taken place, and 3 have

² There is work done prior to the job being ready for posting that can add 30-60 days to the process. Onboarding time can be impacted by how much time a Candidate requires for notice to their prior employer and how that coincides with the start of a pay period when is when Candidates begin with the AO.



completed validation and interviews, 3 are in the active posting phase, and 2 will be posted in September. There are an additional 8 sequences anticipated to begin in the next 30-45 days. None of the comments in this report give rise to *Shakman*-level concerns but reflect technical issues for which staff needs to be alert.

- a. TPI Specialist II: This entry level position required additional staffing due to attrition and internal advancement. The hiring sequence began in earnest in April 2023, but at times lacked fluidity to onboard staff. Despite improvements, additional efficiencies could be recognized by ensuring Plan requirements are executed accurately (double-checking) and each phase is scheduled concisely. Finally, HR needs to ensure all County rules regarding salary requirements for existing AO or County employees is critical to ensure accuracy when preparing the Grant of Authority and offer letter. No evidence suggests any issues here were attempts at unlawful political discrimination, but rather based on a lack of information or attention.
- b. IC Group Leader: This position posted in April 2023 by a new generalist. While there was a glitch in the posting question format, HR worked with the DOC to ensure that all Applicants were given appropriate consideration in the validation process. There were no significant compliance concerns throughout this sequence, and technical concerns were limited. The Sr. HR Generalist managed this sequence efficiently and quickly demonstrated her grasp of the requirements, based not only on professional attention to detail, but also the improved training and accessibility of the new Director of HR.
- c. Assistant Manager of FOI: This position initially posted in May by a new generalist was reposted to reflect an Internal Candidate Preference position in accordance with the Employment Plan, something not realized during the Intake Meeting. The need to repost this posting demonstrated the benefit of enhanced communication between HR and the deputy, including notice/inquiry regarding possible addition to the Internal Candidate Preference list, and the process of including language in the Request to Hire. Otherwise, there were no significant compliance concerns throughout this hiring sequence.
- d. Senior HR Generalist: This hiring sequence initially filled 3 vacancies and reported on during the last reporting period. However, a vacancy occurred in July resulting in an offer to a Candidate on the Ranking List. She began in August, 2023.
- e. Junior Data Scientist: This hiring sequence was designed to fill 2 vacancies which began during the last reporting period. As noted previously, the hiring sequence was paused at various stages for operational needs, including the departure and hire of the departmental deputy, and resulted in a longer hiring sequence. However, nothing in this sequence gave rise to any compliance concerns. Both candidates started their positions on June 20, 2023.
- f. Erroneous Exemption Specialist: This hiring sequence began and was completed during this reporting period by another of the new generalists. There were minor technical compliance issues noted but not substantial. The DOC raised salary questions since the successful Candidate is



internal. HR is aware of the need to be mindful of offer amounts for internal or County employed candidates.

- g. Industrial Commercial Junior Analyst: This position saw the successful completion of a hiring sequence in 2022, but additional staffing needs remain, and a new hiring sequence began in June 2023. There were no substantive issues with the posting, validation, skills assessment, interviews or ranking meeting at the time of this report. However, it was discovered that one of the Candidates was ineligible for hire in light of the ethics rules related to nepotism. It is anticipated that an offer will be extended shortly after this reporting period closes.
- h. Residential Junior Analyst: This hiring sequence began in June 2023. There have been no substantive issues with the posting, validation, or skills assessment. However, generalists need to be mindful of the specific criteria during validation to make that process more efficient. Interviews started but are not yet complete as of the time of this report.
- i. Assistant Manager TPI: This hiring sequence began in July 2023. There were no substantive issues with the posting, validation or skills assessment. However, mindfulness of the specific criteria during validation is critical to make sure that process is efficient. Interviews have been completed as well. The Ranking Meeting and offer will occur early in the next reporting period.
- j. Learning and Development Coordinator: This hiring sequence began with the Intake Meeting in late July 2023. The posting closed on 8.31.23, and validation, interviews and selection are anticipated to be concluded early in the next reporting period. There were no compliance concerns related to this sequence.
- k. Research Senior Analyst – Commercial: This hiring sequence began with an Intake Meeting in early August with the posting expected to close in early September. There have been no compliance concerns.
- l. ABL Specialist: This hiring sequence began with an Intake Meeting and is anticipated to post early in the next reporting period.
- m. Assessment Intervention Analyst: This is a new position and began with an Intake Meeting as this reporting period came to a close. The sequence will proceed with posting in early September.
- n. Programmer IV: This hiring sequence began with an Intake Meeting in mid-August, with the posting to begin early in the next reporting period.
- o. Exempt Analyst Group Leader: This hiring sequence began with the Intake Meeting in late August with the posting to begin in early September.
- p. Exempt Analyst III: This hiring sequence began with the Intake Meeting in mid-August. The job was posted in late August and will close on September 6, 2023.



2. Actively Recruited positions:

- a. **Manager of Residential Valuations:** This position posted, and the majority of the hiring activity occurred during the last reporting period. The selection of Candidates and offers were extended during this reporting period. Two Candidates were selected to fill 2 vacancies. There were no substantial compliance concerns noted with this position.
- b. **Manager of TPI:** This position posted in April, with the successful candidate beginning on June 5, 2023. This sequence disclosed an anomaly in the posting questions which HR worked with the DOC to resolve and all Applicants were given appropriate consideration in the validation process. There were no other compliance concerns.
- c. **Manager of Data Collection:** The budget process began in the prior reporting period and the substantive steps were conducted during this reporting period led by one of the new Sr HR Generalists. There was an error in the offer letter (inconsistent with the County budget rules) that was corrected, and the Candidate accepted the offer and started on July 17, 2023. This issue highlights the need for vigilance by HR when preparing the Grant of Authority and offer letters.
- d. **Manager of Special Properties:** This hiring sequence was expedited at certain points with the DOC's approval so that the Generalist the major functions were completed prior to scheduled time away from the office with minimal reliance on other HR staff. While there were no substantive concerns with the manner in which the sequence progressed some of the expedited processes required reminders for the generalist to provide various documents to the DOC. The successful Candidate started on July 3, 2023.
- e. **Senior HR Generalist:** A vacancy in this position in HR resulted in the selection of a Candidate from the Ranking List. She started on August 14, 2023. There were no concerns with this selection.

3. Exempt Hiring

Exempt positions and links to the position descriptions are maintained on the CCAO's website. The DOC's role involves reviewing position descriptions to ensure the individual meets the position's minimum qualifications. The following exempt positions were filled during this reporting period:

- a. Director of Recruitment
- b. Director of Outreach & Engagement
- c. Director of Multi-Family Development
- d. Legal Counsel – Labor and Employment



IV. Requirements of this Semi-annual Report.

Section V(B) of the Employment Plan requires that this semi-annual report include consideration of the following: (i) auditing activities as required by the Plan; (ii) discovered violations of the Employment Plan or policies in the Employee Handbook referenced in this Plan; (iii) complaints of Unlawful Political Considerations in Employment Actions referred to the OIIG; (iv) remedial actions recommended; and (v) corrective actions taken by the Assessor's Office to address the violations.

A. Auditing activities

The DOC focused monitoring on real time activities rather than auditing during this period. Overtime is audited on a bi-weekly basis and nearly flawless. Additional staffing will hopefully bring about reduced OT needs. Time and Attendance is periodically reviewed, and any concerns are raised.

B. Discovered violations of the Employment Plan

There have been no substantiated complaints of unlawful political discrimination during this reporting period. There are instances where hiring processes outlined in the Plan were not completed accurately. Validation, scheduling and interviewer instruction along with salary figures require closer attention for efficiency and accuracy so that HR self-corrects before DOC raises questions. That said, efficiencies and improvements continue throughout the AO. The DOC remains an active monitor, and identifies compliance issues, none of which amount have amounted to constitutional violations this reporting period.

The probationary evaluations (90- and 180-day) experienced untimely completion. However, HR and the DOC worked together to enhance and clarify the notification process for Supervisors to ensure compliance with timing requirements. The result will not be evaluated until the next reporting period but anticipate that the revised process will result in more timely completion of these evaluations across the AO.

The quality of disciplinary processes, investigations and the imposition of discipline is generally compliant. Completion time for investigations has been reduced as well, while noting that some longer reporting times during this period may in part be related to the work by new generalists. There were several investigations that resulted in terminations during this period, and thus, these were more time consuming due to the serious nature of the infractions.

C. Complaints of UPD referred to the OIIG

There were no referrals to the OIIG during this reporting period.

D. Remedial Actions Recommended

Action Items are contained in the DOC Bi-Weekly Reports. The recommendations during this reporting period centered around minor clarification revisions to the Employment Plan, which is in progress.

E. Corrective actions taken

There were no significant remedial recommendations, thus no specific corrective actions are reported.



The issues noted in this report do not rise to the level of unlawful political discrimination. While there is room for improvement from a technical perspective in some areas as noted, the Assessor, Chief Deputy, Legal staff, Deputy of HR and senior management remain committed to finding ways to improve accuracy and efficiencies. This is accomplished by open dialogue with the DOC and the Compliance Analyst, and the opportunity to listen, discuss, and implement agreed upon recommendations. This demonstrates a professional and effective working relationship within the CCAO to ensure compliance with the Assessor's Employment Plan and Employee Handbook.

Respectfully submitted,

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