



John Barrientos, Director of Compliance (DOC), and Greg Fedak, Compliance Analyst, for the Cook County Assessor's Office (AO), respectfully submit 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 September 1, 2024 through February 28, 2025. The DOC's role is to ensure compliance with the Employment Plan and Employee Handbook and to prevent Unlawful Political Discrimination from occurring in any employment actions or practices, except as permitted for exempt positions.¹

Some activity occurred in 20 hiring sequences for *Shakman*-covered positions during this reporting period, including hiring the Director of Compliance and other *Shakman*-exempt positions. Under the current administration, there have been no findings of unlawful political discrimination. The interim DOC completed one investigation related to a possible Plan violation. This investigation found no substantive plan violations, though there were findings of technical and procedural violations that have since been remedied. Further explanation is detailed in the related position, GIS Analyst. Finally, there have been no reports by the OIG involving AO staff in conjunction with any *Shakman*-related allegations.

II. Reporting and Collaboration

A. Periodic Reports and Standing Meetings

The DOC submits periodic reports to the Assessor and key personnel at the AO outlining compliance activities, recommendations, and corrective action suggestions based on monitoring activities. Additionally, the reports highlight staff efforts to work collaboratively with the DOC. The concerns raised in these reports involve technical, rather than substantive, violations and do not pose a risk of unlawful political considerations. However, they do draw attention to recurring issues and suggest the need for ongoing training. The AO issued a revised Employment Plan on January 2, 2024, and training was rolled out to all staff. The DOC was involved with the preparation and review of those training materials.

Various standing meetings are held between the DOC, Assessor, Deputy Assessor, and the Deputies of HR and Legal to address any compliance concerns or initiatives related to the Employment Plan and Handbook. Revisions to the Handbook are underway in the hope of distributing the updated handbook before the upcoming report period. The DOC will soon resume regular meetings with Supervisors to collaborate and discuss various compliance topics that may warrant attention, respond to questions, and provide an opportunity for HR to provide guidance on these topics as well.

¹Monitoring activities were completed by the interim DOC, the newly hired DOC, and the Compliance Analyst during this reporting period.



B. *Hiring Status*

Human Resources (“HR”) is composed of 5 Senior HR Generalists, a Director of Human Resources, and a Director of Recruitment who fulfills duties in the hiring and onboarding processes. HR also has a Director of Learning and Development who complements the hiring process with training programs, as well as additional HR staff to assist with all these duties. This staff performs work related to hiring sequences, onboarding, and discipline-related investigations, as well as other tasks. The Generalists provide an opportunity for more simultaneous hiring sequences to be conducted, as reflected by the number of hiring sequences active during this reporting period. Intake Meetings are more streamlined and provide an opportunity to discuss the minimum and preferred qualifications outlined in the position descriptions, as well as interview questions and scheduling. Familiarity with the hiring processes among all staff leads to efficient discussions of key topics during a final check between HR and the hiring department, providing an opportunity to better manage expectations throughout the process.

C. *Performance Management*

The 2024 annual performance evaluation cycle commenced on September 1, 2024, and concluded on December 15, 2024. The app remains a valuable tool for completing this process, as well as the 90- and 180-day evaluations; updates to the program continue to provide operational benefits. The timing of assessments and appeal work in the office, in limited circumstances, continued to impact the timely completion of evaluations despite best efforts and can be overwhelming for deputies in larger departments when they are not prepared on a rolling schedule over the 90-day window for completion. Continuing to have refresher training for evaluations has proven beneficial, as there are always staff new to the Supervisory role. This provides an opportunity for discussion and feedback with the goal of a smooth process, timely completion, and eliminating technical errors. HR’s responsibility for front-line procedural performance, as well as departmental performance, continued to demonstrate the benefits of office-wide preparation in this cycle.

III. **Role of the DOC**

The DOC’s primary responsibilities are outlined in Article V of the Plan and are carried out by meeting with the Assessor and key staff regarding each of these duties as appropriate. The high-level responsibilities 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.*
- B. *Overseeing Compliance with Employee Handbook Policies, with main topics including:*
 - 1. Handbook Revisions – this task is ongoing.
 - 2. Time and Attendance – This is included in the revised Handbook.
 - 3. Discipline—enhanced processes outlined in the Handbook are designed to facilitate more



efficient operations. Of the disciplinary matters, no compliance concerns were raised.

4. Notices of Employment Action – timely received documentation of employment actions.
 5. Grievances – monitored by DOC as appropriate and raised no compliance concerns.
- C. *Actively working with the Deputy of HR in developing strategies for the Employment Plan, as well as necessary Policies and Procedures to ensure compliance with the Plan.*
1. In conjunction with the Learning and Development Coordinator, completed the training module for the 2024 Employment Plan revisions. The revisions focused on minor adjustments to the hiring processes to create more robust candidate pools and ranking lists, enabling more efficient hiring as needs arise.
 2. Updating the Handbook is underway.
- D. *Accepting, Investigating, and reporting on complaints related to the Employment Plan.*

There was one investigation conducted by the interim DOC involving allegations of Plan violations during this reporting period. This investigation, related to inadvertent emailing (though very soon after retracting), completed IEFs to co-panelists. The results of that investigation revealed that the technical violations were inadvertent and resulted from the internal procedures of another department being violated. The employees who were found to have been technically, but not intentionally or substantively, in violation were not recommended for retraining or any discipline. In the end, there were no repercussions or hindrances to the hiring process due to the violation, and the substantive aspects of the hiring process remained fully compliant with the Employment Plan as explained more fully in the related position note for GIS Analyst I. There have been no referrals to the OIIG from a *Shakman* perspective, and I am unaware if the OIIG has initiated any investigations related to the AO.

- E. *Reviewing Position Descriptions and Notices of Job Opportunities and taking appropriate steps to ensure their accuracy.*
1. Position Descriptions reflect greater consistencies across the AO related to salary and minimum/preferred qualifications.
 2. HR can provide additional guidance to Deputies, particularly those new to their role, to ensure this process brings about hiring efficiencies, improved validation, and office-wide consistency before presenting them for review by the DOC.
- F. *Working with HR to implement training programs, prepare training materials, and conduct training for all employees on the Employment Plan and other policies.*
1. Updated Plan training occurred during this reporting period, and no substantial compliance concerns were noted.
 2. Reporting on training activities remains timely.



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, none of the issues that came to the DOC's attention or that were reported by the DOC rose to the level of unlawful political discrimination or unlawful political contact. The standard is not perfect but rather constitutionally adequate, and the AO continues to meet that standard. The DOC provides guidance on improving compliance for AO staff in various employment actions.

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

The DOC monitored activity in 20 General Hiring processes, some of which began during the last reporting period or involved the selection of additional Candidates from the Ranking List or the Validated Eligibility List for interviews. In addition, there were no Actively Recruited hiring processes, and 5 Shakman-exempt positions were reviewed as directed by the Plan. In support of this activity, the DOC monitored over 200 interviews, reviewed the tabulation score sheets, and attended the Ranking Meetings. Several other hiring sequences involved offers to Candidates from the Ranking List. On average, hiring sequences were completed around 90 days from the job posting to the Candidate onboarding date. Challenges related to hiring sequences highlight the need to carefully balance the obligations under the CBA alongside those under the Employment Plan, particularly regarding the use of Ranking Lists and Validated Eligibility Lists. None of the comments in this report gives rise to *Shakman*-level concerns but reflects technical issues for which staff need to be alert, most notably in applying information from the Intake Meeting regarding the Minimum Qualifications (MQs) to the validation process. Improvements in that regard have been noted during the validation meetings between HR and the DOC, as evidenced by fewer instances where HR and the DOC reach different conclusions regarding MQs and PQs when separately reviewing submittals.

a. Residential Senior Field inspector

- i. Posting Closing Date: October 4, 2023 (Using a ranking list that expires June 2025)
- ii. Hiring Date: TBD; offer letter sent while writing this report.
- iii. Compliance Notes: No notable Plan compliance issues.

b. TPI Specialist II:

- i. Posting Closing Date: February 21, 2024
- ii. Hiring Date: have hired three rounds from this posting; there is an ongoing 4th round that just held a ranking meeting.



- iii. Compliance Notes: This is an entry-level position at the Assessor's Office, and as such, it has a regular need for new hires.² Multiple hiring sequences for this position occurred during this reporting period. The longer the Validated Eligibility List was used, the more cancellations, no-shows, and rejections of interviews occurred. While this is not a substantial compliance concern with this process, the frequency of hiring for this sequence and its entry-level nature, and the frequency of hiring warrants greater efficiency in the hiring process. As this report is being prepared, the use of Ranking and Validated Eligibility Lists is under review between the AO and the union, so this may be remedied in the coming months through the CBA process.
- c. Assistant Manager of Residential Data Collection (filled using ranking list)
 - i. Posting Closing Date: March 6, 2024
 - ii. Hiring Date: The process is ongoing, with a ranking list being used to fill the vacancy created during this reporting period.
 - iii. Compliance Notes: No notable Plan compliance issues.
 - d. Community Outreach Liaison
 - i. Posting Closing Date: April 1, 2024
 - ii. Hiring Date: October 7, 2024
 - iii. Compliance Notes: This was a subsequent hiring from the initial posting; the ranking list was used for the vacancy. No notable Employment Plan compliance issues.
 - e. GIS Analyst I
 - i. Posting Closing Date: August 6, 2024
 - ii. Hiring Date: October 21, 2024
 - iii. Compliance Notes: This sequence had two notable procedural/timing defects. First, the candidate information was sent to the panelists later than prescribed by the Plan (the Plan directs HR to send the candidate list and all applicant materials a minimum of 2 days prior to the first interview). Additionally, HR sent IEFs to all panelists via the same email. Usually, they are sent individually to minimize the chance that a panel member will send their IEF to another panel member, which is

² As an entry level position, employees frequently utilize their experience to move into other positions within the AO resulting in a need for frequent new hires.



precisely what happened in this case. The HR Generalist did not use the correct Ranking Meeting instructions, which should be used when initiating a Ranking Meeting for a position covered by the CBA. Compliance noted the issues before and at the beginning of the Ranking Meeting. The prominent plan violation occurred when the panel members inadvertently sent their IEFs to each other at the end of their scoring. They were recalled, and after investigation, it was determined that while there was a plan violation, there was no misconduct by the interview panel members since HR deviated from custom when providing panel members with the IEFs.

f. Data Architect

- i. Posting Closing Date: July 16, 2024
- ii. Hiring Date: No Candidates Ranked.
- iii. Compliance Notes: No notable Plan compliance issues.

g. Incentives Senior Analyst I

- i. Posting Closing Date: August 20, 2024
- ii. Hiring Date: December 13, 2024
- iii. Compliance Notes: No notable Plan compliance issues.

h. Industrial/Commercial Valuations Junior Analyst

- i. Posting Closing Date: April 21, 2024
- ii. Hiring Date: October 7, 2024 (Ranking list used)
- iii. Compliance Notes: No notable Plan compliance issues.

i. Manager of Residential Valuations

- i. Posting Closing Date: October 2, 2024
- ii. Hiring Date: December 30, 2024
- iii. Compliance Notes: No notable Plan compliance issues.

j. Manager Commercial Valuations

- i. Posting Closing Date: October 7, 2024
- ii. Hiring Date: December 30, 2024 (multiple positions started on the same date)



- iii. Compliance Notes: No notable Plan compliance issues.
- k. Senior HR Generalist
 - i. Posting Closing Date: October 7, 2024
 - ii. Hiring Date: projected to be April 7, 2025
 - iii. Compliance Notes: No notable Plan compliance issues.
- l. Industrial/Commercial Field Inspector --- (September 2024 and Jan 2025 using ranking list)
 - i. Posting Closing Date: October 27, 2024
 - ii. Hiring Date: December 2024 (multiple hires on different dates)
 - iii. Compliance Notes: No notable Plan compliance issues.
- m. Residential Field Inspector III
 - i. Posting Closing Date: November 5, 2024
 - ii. Hiring Date: January 27, 2025
 - iii. Compliance Notes: No notable Plan compliance issues.
- n. Assistant Manager of Commercial Data Collection
 - i. Posting Closing Date: January 6, 2025
 - ii. Hiring Date: No Candidates Ranked.
 - iii. Compliance Notes: No notable Plan compliance issues.
- o. Exempt Analyst III
 - i. Posting Closing Date: January 13, 2025
 - ii. Hiring Date: TBD; ranking meeting held February 27, 2025
 - iii. Compliance Notes: No notable Plan compliance issues.
- p. TPI Senior Specialist
 - i. Posting Closing Date: October 23, 2024
 - ii. Hiring Date: January 13, 2025
 - iii. Compliance Notes: No notable Plan compliance issues.



q. Web Developer

- i. Posting Closing Date: November 6, 2024
- ii. Hiring Date: February 24, 2025
- iii. Compliance Notes: No notable Plan compliance issues.

r. Residential Junior Analyst

- i. Posting Closing Date: January 2, 2025
- ii. Hiring Date: Multiple offers were sent out on February 26, 2025. No start dates commenced as of the time of the report.
- iii. Compliance Notes: No notable Plan compliance issues.

s. Junior Network Administrator

- i. Posting Closing Date: March 3, 2025
- ii. Hiring Date: TBD- not yet closed.
- iii. Compliance Notes: No notable Plan compliance issues.

t. Division Analyst

- i. Posting Closing Date: TBD- not yet posted.

2. Actively Recruited positions:

No Actively Recruited Positions were hired during this reporting period.

3. Exempt Hiring

Exempt positions and links to the position descriptions are maintained on the CCAO's website. The DOC reviews the resume and position descriptions to ensure the individual meets the minimum qualifications. 4 exempt positions were filled during this reporting period with no substantial compliance concerns:

- a) Director of Data Analytics
- b) Director of Data Integrity
- c) Director of Valuations Research
- d) Director of Appeals (in process)



4. DOC Hiring

- a. This process began in July, following the retirement of the prior DOC, effective June 28, 2024. The current Director of Compliance was hired and onboarded in November 2024.

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 prior DOC focused on monitoring real-time activities rather than auditing during this period. Overtime is audited on a bi-weekly basis and is substantially compliant. Additional staffing is expected to reduce overtime needs. Time and attendance are periodically reviewed, and any concerns raised are addressed and resolved. It is anticipated that the same real-time monitoring will continue, but with revisions to the Handbook, auditing for Time and Attendance, as well as Overtime, will likely be implemented.

B. Discovered violations of the Employment Plan

There have been no substantiated complaints of unlawful political discrimination during this reporting period. Efficiencies and improvements continue throughout the AO. The DOC remains an active monitor and identifies compliance issues; none of these have amounted to constitutional violations during this reporting period.

The probationary evaluations (90- and 180-day) were largely completed in a timely manner, except in rare circumstances where questions or time off arose that required permission for the earlier issuance of the evaluation. Continued attention to this area remains necessary to maintain an understanding of the importance of timeliness in this process is maintained.

The quality of disciplinary processes, investigations, and the imposition of discipline is generally compliant. Completion times for investigations have been reduced for the most part. However, some investigations took longer to complete. There was one investigation that resulted in termination during this period, and thus, was 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

Recommendations continue to be discussed when noted and implemented as appropriate.



E. *Corrective actions taken*

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

Conclusion

The issues noted in this report do not rise to the level of unlawful political discrimination, which continues to show the Assessor's and office leadership's commitment to *Shakman* principles. There remains room for improvement in communication, as well as from a technical perspective, and the DOC continues to work with staff to streamline processes for enhanced accuracy and efficiency. This is continuously improved through open dialogue with the DOC and the Compliance Analyst, providing an opportunity to listen, discuss, and implement agreed-upon recommendations. This demonstrates a professional and effective working relationship within the CCAO, ensuring compliance with the Assessor's Employment Plan and Employee Handbook.

Respectfully submitted,

John Barrientos,

Director of Compliance
Cook County Assessor's Office