



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

I. Introduction

This is the first Semi-Annual Report issued by the current DOC. I was hired effective August 23, 2021, and so the primary DOC tasks during this reporting period fell to Susan Feibus, the ACA and Interim DOC. This report is 2-part: the first contains broad information regarding the DOC and the activities of the Compliance Analyst, the second contains the Interim DOCs report, which is titled Second Interim Report, and was filed with the Court on August 16, 2021 and can be found [here](#).

The previous DOCs stated goal for compliance was a proactive approach, with a focus on building an effective compliance program including self-initiated, periodic reports addressed to the Assessor and senior management. That is my goal as well. While this report does not include any activities by the prior DOC, Matt Serio, it does include activities by the Compliance Analyst who was hired in April 2021 as an Actively Recruited Hiring Process. Under the Interim DOC, the Compliance Analyst played an integral part in helping the office maintain compliance, monitoring various employment activities and reporting to the Interim DOC. In the short time we have worked together, we have worked well to maintain a proactive, professional approach to compliance.

II. Initiatives

A. Periodic Reports

Among the duties of the DOC is to prepare periodic reports and issue-specific reports to the Assessor concerning the DOC's duties and responsibilities. I have met with the Deputy Assessor one time to set overarching expectations by each of us and additional meetings have been scheduled consistent with the weekly meetings by the prior DOC with the Assessor and the Chief Deputy Assessor. In addition to these meetings, it is anticipated that periodic reports of Compliance activity will be issued monthly, or more frequently if appropriate.

B. Performance Improvement Plans

The CCAO's Employee Handbook defines the PIP as a formal written process to assist the employee in improving his or her performance to a satisfactory level in specific work-related areas. To achieve that end, PIPs inherently need buy-in and effort from all supervisory levels. While the CCAO's PIP Policy is a work-in-progress, in my first few weeks, we are working through suggested modifications so that the process is utilized more effectively and efficiently as a management tool to bring about employee performance improvements, which will be discussed during the next reporting period.



The Interim DOC reported on PIPs indicating use approximately eight times. There were circumstances when employees were unable to be assessed on specific areas needing improvement yet concluded due in part to timing limitations in the PIP policy. Additional training may be beneficial to ensure higher success rate in the implementation, evaluation, and documentation of the PIP. These types of issues can likely be eliminated by revising the policy to include flexibility in the implementation of a PIP, recognizing the cyclical nature of the work at the Assessor's Office, as well as the benchmark for requiring a PIP s are required, noting that a PIP can be initiated at any time if an employee's effectiveness decreases.

While the prior DOC drafted a PIP reference guide to assist in the process and was modified by HR, there may still need to be enhancements of the training materials as supervisors understand the purpose and use of PIPs along with the documentation and timing. This would ensure supervisors can succeed in utilizing this tool, and employees can not only improve their performance but also exceed in developing professionally, if desired.

C. Hiring Status Report

The prior DOC created a Hiring Status Spreadsheet to track where the CCAO is in different stages of all hiring sequences. This spreadsheet is utilized by a Senior HR Generalist to capture more data (e.g. number of days between critical steps of a hiring process) to allow the CCAO to report on efficiencies in hiring and identify where bottlenecks occurred by creating quantifiable performance metrics. The next reporting period will reflect the overall effectiveness of the tool.

D. Performance Management Checklist

Another tool created by the previous DOC is the Performance Management Checklist to guide supervisors through the Performance Evaluation processes. The prior DOC noted the CCAO's Administrative Operations Department does a good job of distributing this checklist to supervisors as a prompt to start the Performance Management process. The next reporting period will reflect the overall effectiveness of this and any other processes during the next Annual Evaluation cycle which is scheduled to begin shortly after this report has been submitted.

III. Role of the DOC

The DOC's primary responsibilities include but are not limited to the following:

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

The prior DOC utilized a shared organizational spreadsheet which included operational issues, rather than weekly meetings to discuss operational issues. I will monitor this document to determine its effectiveness to capture leadership issues and propose modifications if necessary.



Weekly meetings with the Chief Administrative Officer, the Chief Deputy Assessor, and the Assessor are anticipated to continue as was the practice with the prior DOC. The purpose of those meetings will be to discuss any pending or high-level compliance issues. Having direct communication with these staff members and the Assessor will provide beneficial insight into the operational goals, objectives, and needs. I anticipate the opportunity for meetings with only the Assessor, as needed to allow for candid discussions with on compliance issues.

B. Overseeing Compliance with the Policies of the Employee Handbook

1. Handbook Revisions

Being involved in revising the Employee Handbook is critical. The current version was finalized in November 2020, and revisions are currently underway at this time. In my short time with the CCAO, reviewing this document and discussing the historical development as well as bringing a new perspective will hopefully result in an effective Handbook to guide compliance as the CCAO looks to come into substantial compliance. Concerns with consensus on various content by the previous DOC should be minimal with the arrival of new HR staff and input from Legal and Chief Deputy Assessor.

2. Performance Evaluations

The performance evaluation cycle is anticipated to begin in mid-September, 2021, and conclude in Q1 2022, allowing for evaluations to be thoughtful and effective and not over-burdening staff concluding cyclical work simultaneously. Apparently the 2020 evaluations were the first conducted in quite some time at the CCAO. While the previous DOC noted there were technical issues, a more significant concern revolved around effective input from supervisors. The next DOC report will include an evaluation of the second performance evaluation cycle. It is anticipated that comments and suggestions for improving the quality of evaluations will be incorporated in this cycle. Expectations include supervisors recognizing the benefit of objective examples to support the employee's score rather than using the generic definition of the category as well as comments reflecting the individuality of the employee's performance. It is anticipated that all supervisors embrace the process whole-heartedly during this cycle.

Additionally, Compliance monitored 16 performance evaluations (90 and 180 day). While some were not completed within the time constraints, those types of technical violations should not recur with additional HR staff, who has better understanding of why they occurred and solutions to prevent them from recurring in the future.

3. Performance Improvement Plans

See comments above.

4. Time and Attendance

Payroll seems to be the gatekeeper of many of the time/attendance issues that arise with limited involvement from Compliance. However, I will observe whether time/attendance is a potential area of



concern for Shakman-like issues. It is not anticipated, particularly with the use of CCT. Employees must take ownership of delays in timely clocking in, and supervisors must determine whether discipline is required. The prior DOC noted that Administrative Operations, in conjunction with HR, continually puts forth a good faith effort to rein in and correct deficiencies that result from “more convoluted policies” where confusion creates violations.

5. Discipline

During this reporting period, there were 7 matters monitored by the Compliance Analyst. Some of these matters took several months to complete, which is due in part to change in personnel at the CCAO. Those disciplinary issues have been resolved, and while timeliness is an issue, the necessary parties have been hired to avoid recurring issues in the future.

6. Notices of Employment Action

Notices of Employment Action (NEAs) are the method by which the CCAO documents and notifies myself and the ACA of Shakman-related employment actions such as Overtime Worked, Modified Work Schedules, and Training. NEAs are often accompanied by supporting documentation such as timesheets, Overtime records, or records supporting a request for a schedule change.

7. Grievances

- C. Actively working with the Chief Administrative Officer and the Director of HR in developing strategies for the Plan as well as necessary Policies and Procedures to ensure compliance with the Plan.

The Chief Administrative Officer (CAO) started with the Office in February 2020, the Deputy Assessor of HR began in July 2021, the Director of HR was promoted in May, 2021 from the Senior HR Generalist position, the Compliance Analyst began in April 2021, and I began with the CCAO office on August 23, 2021. We all continue to familiarize ourselves with the revised Employment Plan and Handbook as well as Shakman requirements. These individuals are a resource for me as well as I remain available to work through issues that may arise. It appears that weekly meetings occurred with the CAO and the prior DOC. We will assess whether weekly or bi-weekly meetings with this group of individuals is most beneficial to expedite matters of a general nature while phone calls may be more appropriate for more urgent matters.

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

There is one matter that was referred to the Interim DOC, which will be returned to me for investigation.



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

With each new job posting, Compliance should review the Position Description and compare that to the Notice of Job Opportunity to ensure accuracy. Disqualifying questions need to be configured appropriately to allow HR to more easily screen out those applicants who, by their own admission, do not meet minimum qualifications. Compliance also reviews Position Descriptions for newly created/contemplated positions to ensure the minimum qualifications are thought out and carefully worded to attract the appropriate candidates. The need for objectively ascertainable minimum requirements one must possess to be considered for employment is critical and as the prior DOC noted "not be a continuation or a repetition of essential duties."

There were 2 positions during this reporting period that involved re-evaluation of the minimum qualifications and modifications prior to re-posting that are noted in the Interim DOC report. I was involved in discussions at the tail end about minimum qualifications for one of the positions, which highlighted the need for input from the Department at the outset to ensure appropriate candidates are responsive to the posting.

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

During this period, Compliance was involved with reviewing and commenting on training decks for various items such as Handbook, Interview, Employment Plan, etc. These decks are being revised for clarity and conformance as modifications to these documents occur. The prior DOC recommended enhancing on-line training by utilizing post-training questions, and employees certifying they participated. This implementation is in process. The Compliance Analyst was involved in monitoring 6 training sessions for the Handbook. The CCAO recently began utilizing LMS for training modules. These are self-driven and cannot be monitored "live" for participation, but can be with data drawn from the content and responses to post-training questions, and completion dates.

The prior DOC drafted optional training materials that were designed to benefit internal applicants and add to the transparency of CCAO's hiring processes. I will look into the use of these materials and comment in the next report.

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

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

During this reporting period, the office commenced or filled the following positions using the General Hiring Process:

- Manager of Data Collection
- Manager of Records Management
- Res Jr. Analyst II (x 4)
- I/C Jr. Analyst I (x 4)
- Residential Group Leader
- Industrial/Commercial Group Leader
- Incentives Sr. Analyst
- Assistant Manager of Taxpayer Information
- Manager of Computer Assisted Mass Appraisal
- Residential Field Inspector
- Senior Residential Field Inspector
- Senior HR Generalist
- Division Analyst

In summary, the General Hiring Process entails reviewing the request to hire, reviewing the current Position Description, reviewing the job posting, reviewing proposed interview questions, randomizing the list of applicants, and validating the information received on applications and resumes. Validations can be a time-consuming step as it involves comparing information on each application and resume to the particular position's minimum qualifications. HR uses the randomized list of minimally qualified candidates to create an Interview List. A panel, consisting of those who have received Interview Training, interviews and scores candidates. That same panel then meets to discuss their scores and ranks the candidates at what is known as a Ranking Meeting. HR maintains all documentation for each step of the process in a Posting File. An Exhibit to the Plan is a Posting File Checklist, used to ensure that all required documents have been included in the file. The DOC reviews the Posting File and the Checklist, and HR then tenders an offer to the selected candidate.

2. Actively Recruited

During this reporting period, the office filled the following positions using the Actively Recruited Hiring Process:

- Compliance Analyst
- Director of Compliance

The Actively Recruited Hiring Process is similar to the General Hiring Process. There is a review of the justification to hire, position description, and interview questions; and the DOC, along with HR and the ACA, conducts a validation of application materials. There is no randomization of validated candidates



though. Instead, the entire pool of minimally qualified candidates are presented to an Application Review Panel who creates a list of candidates to interview. Panel members then interview and rank candidates. Based on those rankings and ranking notes, the department head makes a selection.

a. Review of the General and Actively Recruited Hiring Processes

During this reporting period, Compliance reviewed approximately 200 applications and accompanying materials. Compliance monitored at least 28 interviews, attended 7 validation meetings, and 4 Ranking Meetings and reported by the Interim DOC. In the past, HR has been encouraged to develop a team-oriented approach to complying with the Employment Plan's hiring requirements. With a full complement of employees, success in this area is anticipated, particularly when staff rely on each other for Peer review, proofing, and assistance as noted by the ACA/Interim DOC.

b. Exempt Hiring

The DOC's role in Exempt Hiring sequences is limited to ensuring that the selected individual meets the particular position's minimum qualifications.

A list of Exempt positions is maintained on the CCAO's website along with links to the position descriptions. Changes to the list of Exempt positions, or their descriptions, are subject to the approval of the DOC, ACA, and Shakman Plaintiffs' Counsel.

IV. Requirements of this Semi-annual Report

Section V(B) of the Employment Plan requires that this semi-annual report include 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
- B. Discovered violations of the Employment Plan
- C. Complaints of UPD referred to the OIIG

One complaint having a component that touched upon possible UPD was referred to the OIIG who directed the DOC to investigate. While the Interim DOC received the materials, the matter will be completed by me hopefully during the next reporting period.

- D. Remedial Actions Recommended
- E. Corrective actions taken



V. Substantial Compliance

On August 15, 2012, the Assessor's Office consented to the entry of an Agreed Order by the District Court. The Agreed Order for the Cook County Assessor's Office provides the framework for the Assessor's Office to implement additional policies and procedures to assure that all aspects of employment are free from unlawful political discrimination. In order to be removed from federal oversight, the Assessor's Office has the burden of showing that it is in Substantial Compliance with the Consent Decrees and the Agreed Order. Substantial Compliance means:

- A. The Assessor has implemented the New Employment Plan, including procedures to ensure compliance with the Employment Plan and identify instances of non-compliance

A version of the Employment Plan has been in place for quite some time. The most recent version of the Plan was filed with the Court on September 4, 2020. The Office has adopted methodologies to ensure compliance with the Plan and identify instances of non-compliance. These include maintaining more organized Posting Files, providing training to appropriate personnel on interviewing, and standardizing processes outside of those already prescribe by the Plan.

The CCAO staff, not only HR and DOC, need to develop familiarity with the Plan to ensure that those procedures are being followed.

- B. The Assessor has acted in good faith to remedy instances of non-compliance that have been identified, and prevent a recurrence
- C. The Assessor does not have a policy, custom, or practice of making employment decisions based on political reasons or factors except for Exempt Positions
- D. The absence of material noncompliance which frustrates the Assessor's Consent Decrees and the Agreed Order's essential purpose. However, technical violations or isolated incidents of noncompliance shall not be a basis for a finding that the Assessor is not in substantial compliance
- E. The Assessor has implemented procedures that will affect long-term prevention of the use of impermissible political considerations in connection with employment with the Assessor.



One of the goals of the compliance unit is to assist in the implementation of policies and procedures that will live beyond different administrations and have the lasting effect of maintaining compliance. Automation of many processes are under way, and will reduce the technical, inadvertent violations, increase transparency, and make it more difficult to intentionally deviate from processes. The Compliance Analyst has been monitoring these activities as well. Timely access to shared drives for new staff will assist in understanding the flow of employment matters in a clear and concise manner.

The Assessor and Chief Deputy's commitment to continually meeting with the prior DOC and listening to recommendations in the past demonstrates a desire to reach substantial compliance with the Agreed Order. Such cooperation has been demonstrated by incorporating the Compliance Analyst into meetings prior to my arrival, and with me in the short time I have been with the Office.

I will review and revise, as appropriate, the strategic plan drafted by my predecessor for the Compliance Unit leading up to and following sunset. This plan breaks down the DOCs level of involvement in and responses to various employment actions. Working in harmony with HR, will be vital to the success of the CCAO's commitment to adopting a practice of timely responding to all of the recommendations from Compliance, not just those made in connection to an investigation or audit. The CCAO previously accepted this proposal and expressed agreement with the compliance plan, and I anticipate the same acceptance and implementation of any revisions to the strategic plan.

As noted by my predecessor, "with commitment from the right personnel, there is no reason the compliance plan cannot succeed, and all parties feel satisfied that the CCAO is capable of following and enforcing its policies and procedures consistent with the Agreed Order."

Respectfully submitted,

Elizabeth M.S. Oplawski
Director of Compliance
Cook County Assessor's Office