



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 September 1, 2023 through February 29, 2024. The DOC's role is to ensure compliance with the Employment Plan and Employee Handbook and that Unlawful Political Discrimination does not occur in any employment actions or practices except as permitted for exempt positions.¹

There was an extensive amount of hiring that occurred during this reporting period. Twenty hiring sequences for *Shakman*-covered positions involved new postings or additional hirings from Ranking Lists. Additionally, 2 hires into *Shakman*-exempt positions occurred. 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 OIG. While the DOC investigated into two matters, neither resulted in findings of inappropriate conduct.

II. Reporting and Collaboration

A. Periodic Reports and Standing Meetings

The DOC submits monthly reports to the Assessor and key personnel at the AO outlining compliance activities, recommendations, and corrective action suggestions based on a variety of employment actions. Additionally, the reports highlight efforts from staff to work collaboratively with the DOC. The concerns raised in these reports are more technical than substantive in nature, and do not risk unlawful political considerations, but do draw attention to recurring issues and suggest the need for additional training. The AO is in the process of updating the Employment Plan training which will be administered to all AO staff during the next reporting period.

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. Revisions to the Plan were issued on February 1, 2024. While minor in quantity, the intended effect is designed to bring about more efficient and successful hiring sequences. 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 provide guidance on these topics as well.

¹Monitoring activities were completed by 1 person during this reporting period. The Compliance Analyst was hired into a *Shakman* Exempt position, Legal Counsel Labor & Employment, in late August 2023, and served as the Interim DOC in my absence during October-November. The new Compliance Analyst began February 26, 2024.



B. *Hiring Status*

There are 5 Senior HR Generalists, a Director of Human Resources, a Director of Recruitment, and a Director of Learning and Development who complement the hiring process, as well as additional HR staff. This staff perform the work of hiring sequences and onboarding, as well as discipline related tasks. The Generalists provide an opportunity for more simultaneous hiring sequences to be conducted and is reflected by the increase in hiring activity during this reporting period. Intake Meetings are more streamlined as well yet still provide an opportunity to discuss minimum and preferred qualifications in the position descriptions, interview questions, and scheduling. Familiarity with hiring process by all staff results in efficient discussions of key topics for a final check between HR and the hiring department as well as an opportunity to better manage expectations during the process.

C. *Performance Management*

The 2023 annual performance evaluation cycle concluded on December 15, 2023. The app continues to be a helpful tool to complete this process, as well as the 90 and 180-day evaluations. The timing of assessment and appeal work in the office impacted timely completion of the evaluations despite best efforts, compared to the 2022 cycle. However, with more than a 90-day window to complete evaluations, staff has flexibility to complete evaluations while managing office tasks, which will hopefully reduce this from being an on-going issue. A refresher prior to the annual cycle may eliminate technical glitches as well as ensure timely completion, particularly for Supervisors who have not completed 90 or 180-day evaluations during the year. During the 2023 cycle, HR's responsibility for front-line procedural performance as well as departmental performance identified some ways compliance can be improved in the 2024 cycle and will be discussed with key personnel when the DOC's full report is complete.

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 is a task on the agenda for 2024
 - 2. Time and Attendance – this is included in the Handbook revisions
 - 3. Discipline – enhanced processes through Handbook revisions may help bring about more efficient processes. Of the disciplinary matters, no compliance concerns were raised, aside from the length of time some investigations took.
 - 4. Notices of Employment Action – timely received documentation of employment actions



5. Grievances – monitored by DOC as appropriate and raise no compliance concerns.
- 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.*
1. Edits to the Plan, minor in scope, but significant enhancement for the hiring process were published on February 1, 2024. The goal is to realize more robust candidate pools for hiring sequences.
 2. Updated training regarding revised Plan provisions is underway.
- D. *Accepting, Investigating, and reporting on complaints related to the Employment Plan.*

The DOC investigated one matter related to possible violations of the Employment Plan which was not sustained. 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 assure their accuracy.*
1. Position Descriptions reflect greater consistencies across the AO related to salary, and minimum/preferred qualifications.
 2. HR can increase guidance to Deputies, particularly those new(er) in their role to ensure this process brings about hiring efficiencies as well as office-wide consistencies prior to 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 is underway with a go-live date during the next reporting period.
 2. Reporting on training activities continues to be 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. Execution of Plan or Handbook provisions was not always perfect, as noted for example with the untimely completion of some performance evaluations, but these are not material violations, rather technical or immaterial. 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

The DOC monitored activity in 16 general hiring processes, 4 sequences began during the last reporting period, 11 were new and not all completed during this reporting period, and 1 involved the selection of additional Candidates from the Validated Eligibility List for interviews. In support of this activity, the DOC monitored approximately 100 interviews, as well as the reviewed the tabulation scoresheets, and monitored the Ranking Meetings. Several other hiring sequences involved offers to Candidates from the Ranking List. On average, hiring sequences were completed in 92 days from the job posting to the Candidate onboarding date. While this is a slight uptick from the 81 days during the last reporting period, a new Sr HR Generalist started in August and there was a learning curve for her, as well as the greater number of sequences in process.² Union challenges related to hiring sequences highlights the need for the AO to balance the obligations under the CBA alongside those under the Employment Plan.³ None of the comments in this report give rise to *Shakman*-level concerns but reflect technical issues for which staff needs to be alert, most notably in applying information from the Intake Meeting regarding the 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. TPI Specialist II: This is an entry level position at the Assessor's Office and as such has a regular need for new hires.⁴ The hiring sequence that began in April 2023 nearly exhausted the Validated Eligibility List and Ranking Lists to fill needed vacancies due to staffing changes (i.e., moves to new positions in the office or retirements). Due to a need for additional bi-lingual staff, a new hiring sequence was posted in February 2024. While the posting required correction and clarification after the DOC's review, interviews are anticipated to occur late March/early April. Some of these questions might have been addressed in the Intake Meeting, which did not take place, nor is it required.
- b. Industrial Commercial Junior Analyst: This hiring sequence began in June 2023 to fill 3 vacancies

² The Thanksgiving and Christmas holidays impacted staff availability, not only in HR but also in departments for individuals to serve on interview panels. The work done leading up to a job posting as well as Candidate notice to their prior employer before their start date can add 30-60 days to the process. This figure is calculated from the job posting date.

³ The Employment Plan recognizes and respects the CBA and specifically provides that the Plan is to be construed and administered consistent with the CBA.

⁴ 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.



but the Candidate pool only produced 2. While there were no substantive issues with this sequence, the DOC noted that care in drafting interview questions is needed to ensure they align with the MQs of the position. Since additional vacancies exist in the department, a new posting will begin early in the next reporting period.

- c. Residential Junior Analyst: This hiring sequence began in June 2023 to fill 3 vacancies. There were no substantive issues with the sequence. However, the DOC recommended revisions to the interview questions to ensure they aligned with the MQs of the position. Additional staffing needs in the department require a new posting early in the next reporting period.
- d. Assistant Manager TPI: This hiring sequence began in July 2023. There were no substantive issues with this hiring sequence. The successful candidate began on October 23, 2023. As a result of upward movement from this position, a vacancy exists which is anticipated to be filled early in the next reporting period.
- e. Learning and Development Coordinator: This hiring sequence began in late July 2023. There were no compliance concerns related to this sequence, and the successful candidate began on November 20, 2024.
- f. Research Senior Analyst – Commercial: This hiring sequence began in early August 2023. There were no compliance concerns related to this position, and the successful candidate began on November 5, 2024.
- g. ABL Specialist: This hiring sequence began with an Intake Meeting during the last reporting period. However, hiring priorities shifted, and the posting for this position was intentionally delayed until late January 2024. There have been no compliance concerns with the posting and validation. Interviews began in early March.
- h. Assessment Intervention Analyst: This is a new position and began with an Intake Meeting. The sequence proceeded without any substantial compliance concerns. The successful candidate began on December 4, 2023.
- i. Programmer II: This hiring sequence began in mid-August and resulted in a reposting in November due to a lack of response by qualified individual. The new posting netted a small pool of candidates, from which a successful candidate was extended an offer, that was declined. While no substantial compliance concerns were noted in this sequence, discussions about how the MQs are validated during the Intake Meeting might provide guidance for refining the position description to attract an even wider pool of candidates since this position will need to be reposted.
- j. Exempt Analyst Group Leader: This hiring sequence began with the Intake Meeting in late August and proceeded without any substantial compliance concerns. The successful candidate began on November 6, 2023.



- k. Exempt Analyst III: This hiring sequence was to fill 2 vacancies and began with the Intake Meeting in mid-August and concluded without any substantial compliance concerns. The successful candidates began on December 4, 2023. An additional vacancy was filled from the Ranking List and began on February 13, 2024.
- l. Residential Field Inspector: This hiring sequence was to fill 2 vacancies and began with an Intake Meeting in September and concluded without substantial compliance concerns. The successful candidates began in January 2024.
- m. Investigator III: This hiring sequence began with an Intake Meeting in October and concluded without any substantial compliance concerns. The successful candidate began on January 16, 2024
- n. Graphic Designer: This hiring sequence began with an Intake Meeting on October 31, 2023. Due to the unique nature of the qualifications of this position, the hiring department, HR and the DOC collaborated to create an Interview Evaluation Form that captured a scoring rubric for the portfolio along with the interview questions. Interviews were scheduled for late February/early March.
- o. Assistant Manager Commercial Data Collection: This hiring sequence seeks to fill 2 vacancies and began with an Intake Meeting on January 3, 2024. The job posted in late February and interviews will be scheduled in late March.
- p. Assistant Manager Residential Data Collection: This hiring sequence is for 1 position, and began with an Intake Meeting on January 3, 2024 as well. The job posted in late February with interviews slated for late March.

2. Actively Recruited positions:

- a. Compliance Analyst: This position posted in November, and the selected Candidate began on February 26, 2024. This was a unique sequence since the DOC was a member of the interview panel, but also responsible for monitoring HR's activities, which gave rise to some questions regarding the DOCs role in validation. They were resolved by the DOC conducting an in-process audit of HRs validation and the addition of 4 Candidates to be reviewed by the Application Review Panel. This ensured compliance with the Plan that the Application Review Panel consider all minimally qualified candidates. There were no other substantial compliance concerns noted with this position.
- b. Director of Customer Experience: This position posted on November 30, 2023. There were no substantial compliance concerns with this position, although there were discussions about who would be qualified to serve on the interview panel. The selected Candidate began on February 26, 2024.
- c. Director of IT: This position posted on December 8, 2023 and the selected Candidate is anticipated to begin in late March. This position was reposted due to limited number of qualified applicants



from the first posting, but otherwise, no substantial compliance concerns. The Candidate will begin in early March.

- d. Manager of Computer Assisted Mass Appraisal: The position posted in January, 2024, and interviews are scheduled for early March. There are no substantial compliance concerns to date.

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. The following exempt positions were filled during this reporting period with no substantial compliance concerns.

- a. Director of Press Relations and Research
- b. Director of Policy

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 substantially compliant. Additional staffing will hopefully bring about reduced overtime needs. Time and Attendance is periodically reviewed, and any concerns raised are resolved.

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 which amount to constitutional violations this reporting period.

The probationary evaluations (90- and 180-day) experienced untimely completion despite enhanced notice to Supervisors. Better understanding of the process will be addressed through the updated training.

The quality of disciplinary processes, investigations and the imposition of discipline is generally compliant. Completion time for investigations has been reduced as well for the most part. However, there have been



some investigations that took longer to complete. There was one investigation that resulted in termination during this period, and thus, these 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, thus no specific corrective actions are reported.

The issues noted in this report do not rise to the level of unlawful political discrimination which continues to show the Assessor's commitment, along with the leadership of the office to the constitutional principles underlying the *Shakman* litigation. There remains room for improvement from a technical perspective and the DOC works with staff to streamline processes for improved accuracy and efficiency. 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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