



State of Illinois
Department of Central Management Services

CMS PERSONNEL COMPLIANCE SEMI-ANNUAL REPORT

January 1, 2025 – June 30, 2025



Compliance Office
Bureau of Personnel
Central Management Services

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Executive Summary

The reporting period for this Semi-Annual Compliance report covers January 1, 2025, through June 30, 2025. Everything within this report covers activities only handled and tracked by Illinois Department of Central Management Services (CMS) Personnel 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;
- (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

Due to changes in staffing and transition periods, auditing was put on hold during the Compliance Officer (CO) Interim Assignment (IA) into the Chief Compliance Officer (CCO) position and the first reporting period the new CCO covered. To make up for this, a catch-up project commenced at the start of this reporting cycle. A total of 17 audits were completed to get into compliance with CEP paragraphs 60 and 70 between quarters two of 2023 and four of 2024 (7 quarters total) which would have covered most of the IA and new CCO time mentioned above. 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. Those criteria are 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 positions and IA covers merit comp positions.
 - TA Audits completed
 - Covered 70 Employees total
 - 21 Agencies:
 - AGR
 - IA Audits completed
 - Covered 30 employee's total
 - 14 Agencies
- Personal Services Contracts (PSC) – focusing on those that have been extended past one year – to ensure that a valid justification supports the PSC.
 - PSC Audits Completed
 - Covered 29 Contractors
 - 13 Agencies



Overall, most of these audits found valid justification that supported each of the three 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 has instituted increased vetting and has been reducing the overall time frame for approvals to force the agency to competitively select.

Violations of the CEP

Violations are typically handled via denials or mitigating the situation amongst all parties to come to a resolution that minimizes risk. This report goes into detail about the denials issued, as well as political contacts and discrimination. These are covered separately later in the report. Material Hiring Errors (MHE) are a subset of the Employment Hiring Errors (EHE) section that has been revamped to cover greater detail than prior reports.

Remedial Action Recommended

As you will see throughout this document, there are numerous opportunities for agency HR staff to be more thoroughly trained on how their role is pivotal to CEP compliance. Considering the audits completed this cycle, as well as the five MHEs out of an overall 65% increase in total EHEs, Compliance also recommends training of CMS Bureau of Personnel (BoP) staff to notify Compliance as soon as an error is discovered to partner in a way to avoid a MHE and minimize all EHEs overall.

Corrective Actions Taken by CMS

While this cycle has been a learning opportunity for the CCO as well as the entire 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.

Auditing Activities

In addition to the CEP required audits previously mentioned, an Exempt List 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 our list matches those positions previously approved either by statute or the Civil Service Commission.



Personnel Compliance Strategy Activities

Improve the timeliness, efficiency, and quality of the hiring process

Maintain a Responsiveness Standard: We aim to respond to agency compliance queries within two days, providing full feedback and determinations. Although we strive to meet this goal, certain complex requests may necessitate consultation with internal CMS business partners, which could extend the response time beyond two days. The greatest influence on this is partner and agency response times.

Assess, Develop and Deliver Compliance Training for Agencies, Boards, and Commissions

- **Daily Communication and Coaching:** The CCO and all three COs regularly engage with HR Directors and senior HR staff, offering daily coaching on compliance issues.
- **Consistent Guidance:** Compliance Officers maintain regular communication with agency HR staff and CMS BoP administration and staff, providing insights and guidance on compliance matters. CMS Legal, Labor, and the Hiring and Recruiting Team are partners in this consistency goal.

Improve Workplace Culture towards Continuous Improvement and Respect

- **Foster a "Speak Up" Culture:** Encourage a respectful environment where team members and agency staff can express their opinions and contribute to compliance process improvements. For instance, during site visits agencies suggested ways to improve the SharePoint for query submission and reporting which were implemented.
- **Respectful Collaboration:** Always treat agency representatives with respect during Compliance approval requests and throughout the collaborative process as well as the report collection process.

Utilize Modern Data Practices to Improve Program Evaluation

- **SharePoint for Compliance Queries:** We constantly update the state-wide SharePoint site as the primary intake method for compliance queries and reporting.
- **Political Contacts System:** A separate public facing website connected to a different SharePoint system for political contacts is in place, offering similar capabilities for trend analysis.

Improve Customer Value and Reduce Waste

- **Eliminate Redundant Checks:** We have removed Compliance approval on some situations where data indicated a lack of trend or the existence of redundant checks within the CMS BoP.
- **Ongoing Process Review:** Every improvement whether policy, procedure, or system is evaluated, and changes made after implementation to ensure it is value added and not duplicative for agency.

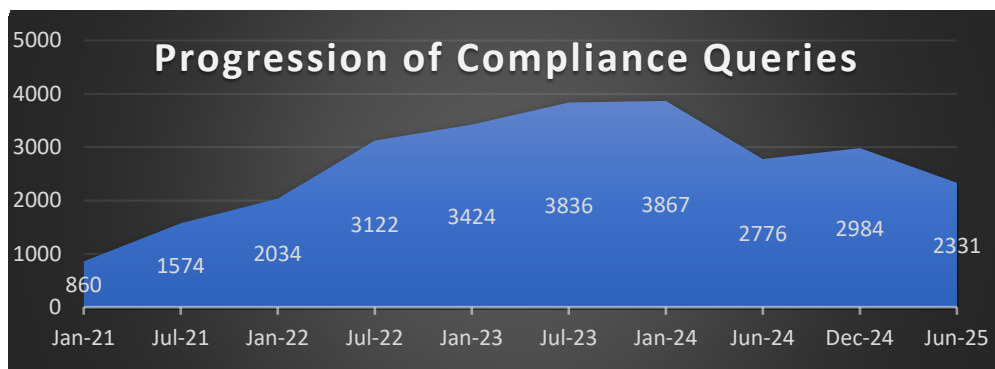


Progression of Compliance Queries

The Compliance team manages daily requests from over 50 agencies, boards and commissions throughout the state divided among three Compliance Officers who have been in the position since 2021. The officers rotate their client base on a quarterly basis now using a macro that ensures they don't have the same group they had the previous quarter, and it fairly distributes based on the number of queries submitted by each agency, board, and commission during the last quarter.

State agencies are diligently reviewing and adhering to the CEP revised in 2021. For the six months of this semi-annual report, the CMS Personnel Compliance Office completed 2,331 compliance reviews from State agencies, boards, and commissions. If we compare to Dec '24 report, it is down by 22% from 2,984, which can be attributed to improvements in our Human Capital Management system reducing errors requiring Compliance approval requests as well as the HRT transition removing a significant scope of duties that Compliance was originally performing until January. We processed 201 queries that we closed as HRT during this period.

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



While the following pages go into detail about how the 2,331 break down into compliance types, agency counts, employment errors, and denials, the following highlights this reporting periods improvements.

Compliance SharePoint Site

Launched in February 2023 and upgraded in June and December 2024, the Compliance SharePoint site has been our primary intake method for compliance queries. Continuous feedback has led to improvements in functionality, such as allowing agencies to enter multiple queries of the same type with less effort. Starting 7/1/24, agencies are required to fully utilize the site's capabilities, which will enhance just-in-time reporting and personalized communication during site visits. Additionally, the latest upgrade allowed approved PSCs to automatically feed into the required quarterly reporting system. While there is some transition tasks involved, this will eventually remove the reporting burden from agencies for at least those PSCs that are competitively selected.



Exempt Positions

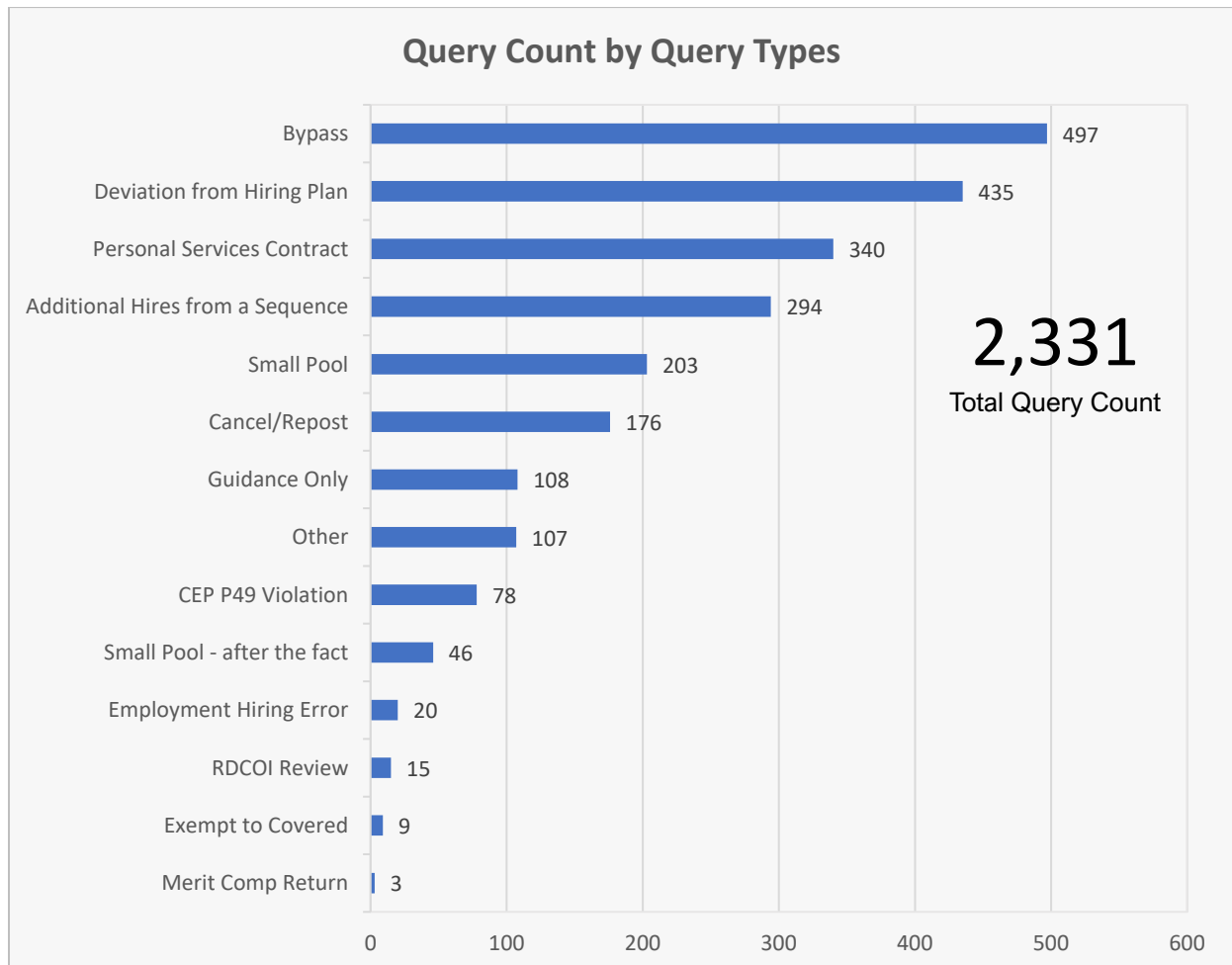
CMS Compliance is involved in the exempt position establishment process working with CMS Chief Administrative Officer, OEIG-HEM and the Civil Service Commission. Additionally, they work very closely with OEIG-HEM during the Exempt PSC approval process. Finally, they are responsible for ensuring all agencies report all exempt positions that are published monthly on the CMS website. For the first time ever, the CMS Compliance department audited the exempt list to ensure all positions previously approved were listed on that report while working with agencies to get it corrected.

Distribution of Compliance Queries

The graph below illustrates the distribution of compliance queries by category, highlighting the predominance of the top seven categories and the time-intensive nature of certain query types.

Bypass remains the most common query type with 497 entries, followed closely by Deviation from Hiring Plan (435) and Personal Service Contracts (340). Across all 15 query types these three 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 we do have 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 which will be discussed in more detail later in this report. The Bypass and Personal Services Contract requests are either the riskiest or are under the largest amount of public scrutiny, which is why the vetting process may go beyond our two-day turnaround goal.



CMS BoP HRT (Melisa Hatch and Becky Collins) & Compliance (Amy Gurnitz and Donna Skowronski) Site Visit with Bruce Bennett

Bypass

Bypass queries are complex, requiring careful review and research to ensure compliance with applicable laws, governing documents, and policies. We frequently confer with our partners in CMS Labor Relations and Legal engaging in extensive communication with the requesting agency to provide accurate and consistent responses.

Personal Services Contracts (PSC)

PSCs are cyclical in nature accounting for a good majority of our work especially in December, January, June, and July around the semi-annual renewal dates of January and July 1st each year. This is why we ask agencies to get these requests submitted to us at least two weeks in advance of the contractor start date desired by agency.

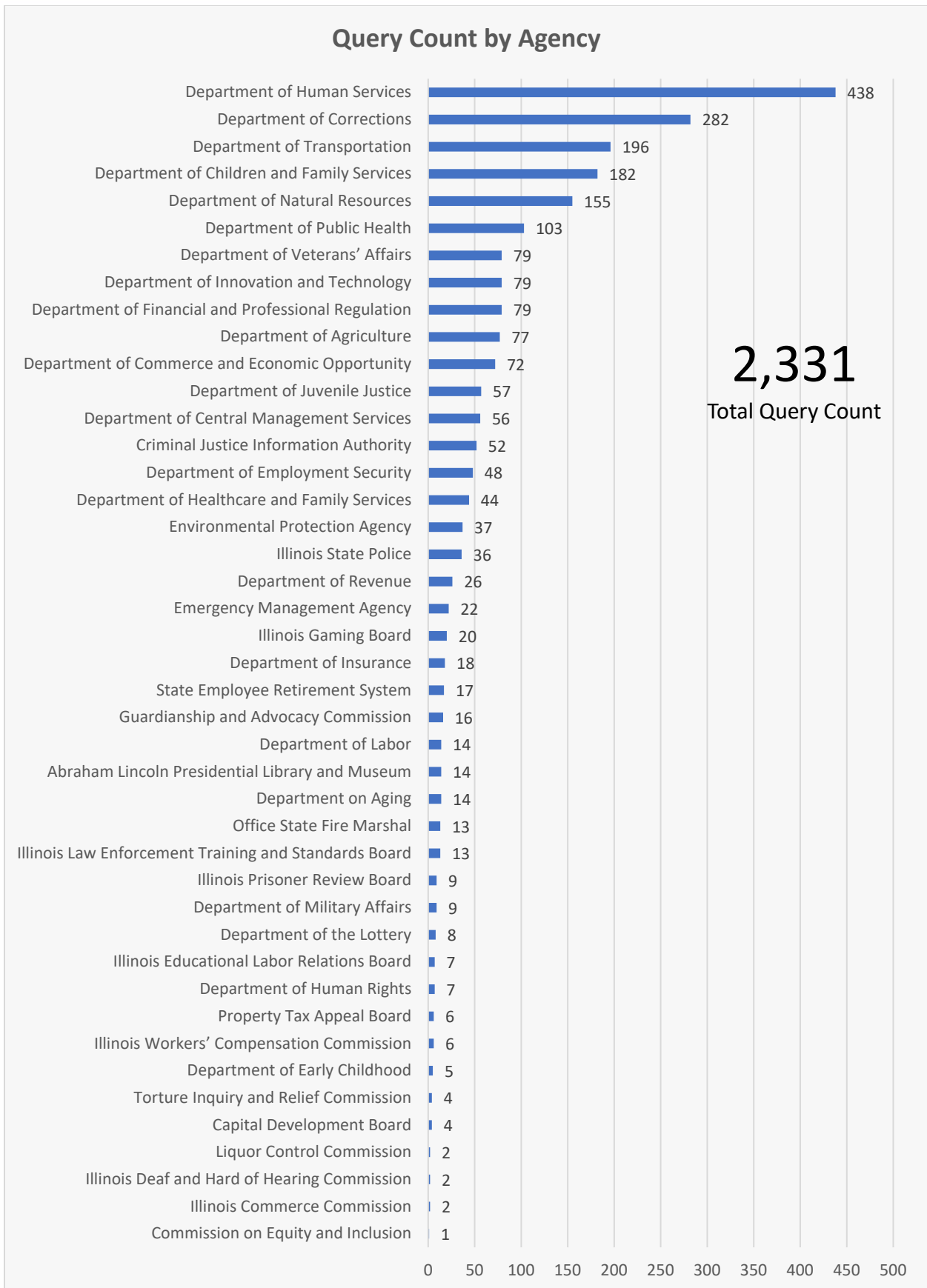
The following chart outlines exactly how many compliance queries are submitted per agency. See note on the chart summarizing the findings.

Agency Breakdown of Compliance Activity

The Department of Human Services submitted the highest number of compliance queries at 438, reflecting the agency's large workforce and operational complexity.

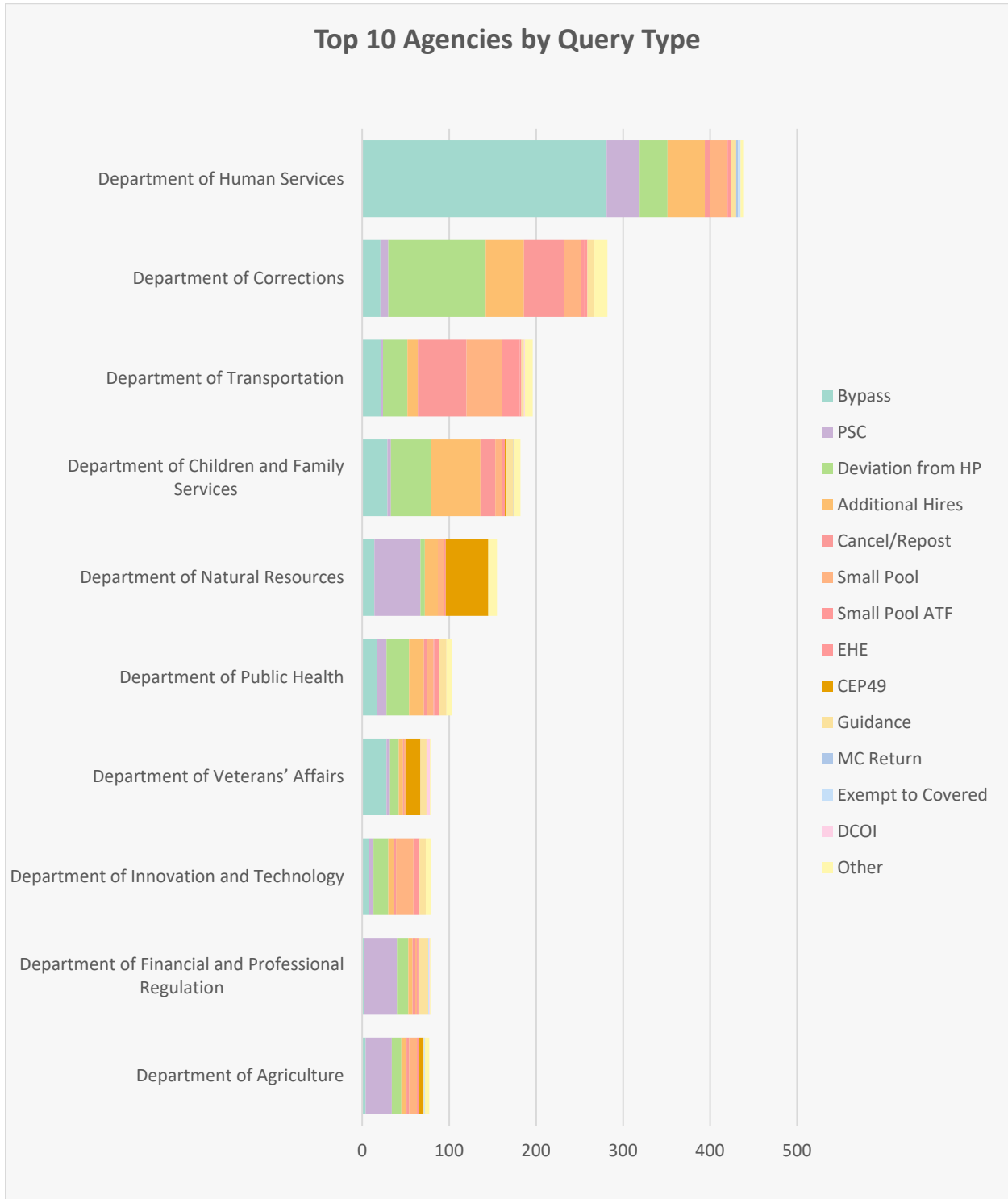
Other top contributors included the Department of Corrections (282) and Department of Transportation (196).

Smaller agencies such as the Commission on Equity and Inclusion 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.



Analysis of Query Types by Top-Submitting Agencies

The chart below displays the top ten agencies by overall query volume, broken down by query type. This layout allows a clearer understanding of how volume and distribution differ across departments, and what types of requests drive the highest activity.



Among the top ten agencies by query volume, the Department of Human Services (DHS) submitted the highest number overall, with 438 queries. The majority were Bypass requests (281), representing more than 64% of DHS's total. The agency also submitted a notable number of PSC and Additional Hire queries. Given DHS's size and broad operational scope, this high volume aligns with expectations for a large, high-volume agency.

The Department of Corrections (DOC), with 282 queries, had a different profile. Nearly 40% of its activity (112 queries) involved Deviation from Hiring Plan, making DOC the leading agency for that category. DOC also recorded 46 Cancel/Repost requests and a substantial number of Additional Hire queries, pointing to frequent changes in hiring needs and adjustments to recruitment plans.

Illinois Department of Transportation (DOT) (followed with 196 queries. Its largest segments were Cancel/Repost (56) and Small Pool (41). Notably, Department of Transportation submitted 20 Small Pool After the Fact queries, facing challenges in generating sufficient applicant pools or following pre-approval protocols in a timely manner.

The Department of Children and Family Services (DCFS) submitted 182 queries, with its activity concentrated in Additional Hires from a Sequence (57) and Deviation from Hiring Plan (46). DCFS had the highest count of Additional Hire queries among all agencies. It also submitted 29 Bypass requests, though these made up a smaller share of its total compared to DHS.

The Department of Natural Resources (DNR) submitted 155 queries, including 53 PSC requests and 49 CEP49 violations. DNR had the highest count of CEP49 violations among all departments, which aligns with patterns observed in seasonal and time-sensitive hiring workflows.

Two other agencies, the Department of Financial and Professional Regulation (DFPR) and the Department of Agriculture (AGR), also showed a strong reliance on Personal Services Contracts. DFPR submitted 38 PSC queries out of 79 total, while Agriculture reported 30 PSC queries out of 77.

The remaining top ten agencies, the Department of Public Health (DPH), Department of Veterans' Affairs (DVA), and Department of Innovation and Technology (DOIT), each submitted between 70 and 100 queries. Their activity was more evenly distributed across query types. While some departments submit high volumes due to their size or structure, others display concentrated activity in specific categories, highlighting areas for targeted guidance or process refinement.



CMS BoP HRT (Matt Franklin, Jeff Meier and Melisa Hatch) & Compliance (Julie Brightwell and Donna Skowronski) Site Visit with DVA HR Team



Customer Service and Response Time

Outstanding customer service is a cornerstone of the Compliance Team's reputation. The Compliance Office is committed to working efficiently and effectively to deliver timely, accurate, and actionable replies to agencies. Our 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 our standard due to:

- 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 Compliance Officers and possibly the Chief Compliance Officer to analyze complex situations
- Response time of the agency when we question anything related to the submission

With an average response time of 1.96 calendar days, the Compliance Office improved upon the previous cycle's 2.10-day average.

Notably the Capital Development Board, Illinois Deaf and Hard of Hearing Commission, and Liquor Control Commission, all averaged one day due to quickly responding to the Compliance teams inquires and providing relevant information and documentation. Conversely, agencies like the Office of State Fire Marshal (3.38 days) and the Prisoner Review Board (5.33 days) experienced extended timelines, often due to case complexity or follow-up requirements.

Agency	Average Days to Close
Abraham Lincoln Presidential Library and Museum	1.29
Capital Development Board	1.00
Commission on Equity and Inclusion	1.00
Criminal Justice Information Authority	1.62
Department of Agriculture	1.65
Department of Central Management Services	2.25
Department of Children and Family Services	2.47
Department of Commerce and Economic Opportunity	1.90
Department of Corrections	1.61
Department of Early Childhood	2.80
Department of Employment Security	1.90
Department of Financial and Professional Regulation	1.70
Department of Healthcare and Family Services	2.50
Department of Human Rights	1.29
Department of Human Services	2.18
Department of Innovation and Technology	1.61
Department of Insurance	1.11
Department of Juvenile Justice	1.86
Department of Labor	3.00
Department of Military Affairs	2.44
Department of Natural Resources	1.71
Department of Public Health	1.67
Department of Revenue	1.27
Department of the Lottery	1.00
Department of Transportation	1.47
Department of Veterans' Affairs	3.72
Department on Aging	3.29
Emergency Management Agency	1.64
Environmental Protection Agency	1.30
Guardianship and Advocacy Commission	2.50
Illinois Commerce Commission	2.00
Illinois Deaf and Hard of Hearing Commission	1.00
Illinois Educational Labor Relations Board	1.57
Illinois Gaming Board	1.40
Illinois Law Enforcement Training and Standards Board	1.85
Illinois Prisoner Review Board	5.33
Illinois State Police	2.56
Illinois Workers' Compensation Commission	2.67
Liquor Control Commission	1.00
Office of State Fire Marshal	3.38
Property Tax Appeal Board	1.50
State Employee Retirement System	1.41
Torture Inquiry and Relief Commission	1.25
Total	1.96

To help keep this goal top of mind each Compliance Officer can track their own days to close on the assigned queries. Out of the 2,331 total queries handled this reporting period, each compliance officer was assigned between 769-785 queries each with an average of 1.78 – 2.07 days to close.

Finally, we monitor 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 the agency requesting the query. While the visual to the left is for demonstration purposes there were zero June queries still open at the writing of this report in July which was required for accurate reporting by agency and Compliance Officer above.



Employment Hiring Errors

In previous reporting periods we did not roll up all the Employment Hiring Errors (EHE) into one section because of how our system reported some EHEs separately. However, due to recent increases in Material Hiring Errors (MHE) described later in this report, we felt it was important to look at the big picture. Before doing so it is important to outline each type of EHE set forth by the CEP. The following defines all the various types of hiring errors as defined by the CEP. Note that responsibility for three of these error types was moved to HRT at the start of this year and do not reflect in our numbers beginning 1/1/25.

EHE Definitions

Below is a list and definition of each employment error based on the resource sourced:

Error Type by Paragraph #	Definition
CEP 29 (now handled by HRT)	Incorrect posting period
CEP 33	Small pool request submitted late (after the fact)
CEP 35 (now handled by HRT)	Relationship Disclosure and Conflict of Interest forms completed late
CEP 36 (now handled by HRT)	Interviewer not certified
CEP 41	Cancellation not requested (submitted as an EHE)
CEP 49	No pre-offer approval from CMS
Personnel Code sect. 8b.7	Veterans' preference violation (submitted as a EHE or Deviation)
Executive Order 18-12	Failed to offer to eligible out of state candidate (submitted as an EHE)

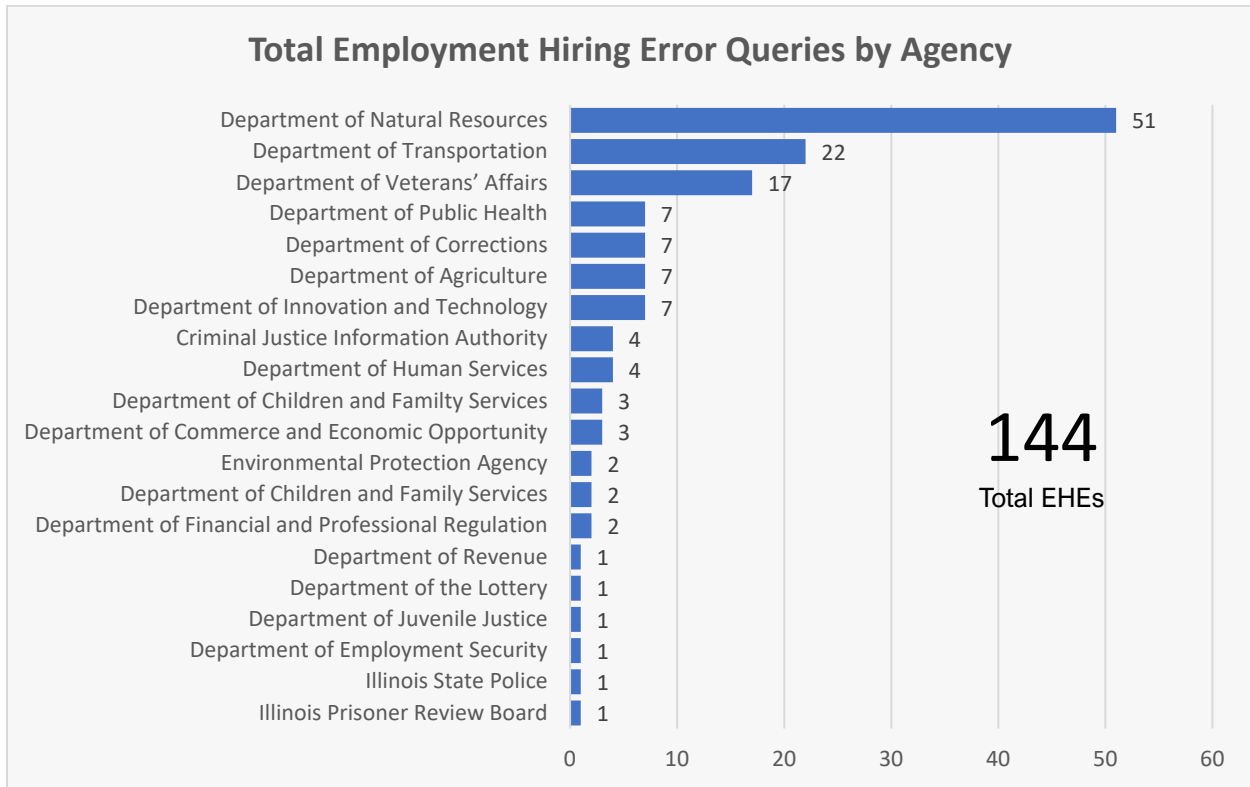
Total EHEs

To get a grasp on the big picture as it relates to hiring errors, the three query types, which includes Small Pool After the Fact, CEP 49 Violation, and all other EHEs, were all added together to come up with an overall total of 144 EHEs. Looking back at the previous report, EHEs have increased by 65 percent. For example, the EHE section of that report showed EHEs at 27, with the other two in the full query count portion of the report as Small Pool After the Fact (SPAF) at 44, and CEP 49s at 23 for a total of 94. Looking at these numbers alone shows a need for training about what an EHE is and how to avoid them.

The chart below presents the distribution of all EHEs by agency. The Department of Natural Resources leads with 51 total errors, followed by the Department of Transportation (22) and the Department of Veterans' Affairs (17). These three agencies alone account for over 60% of all reported EHEs. Several other agencies reported mid-range totals, including the Departments of Public Health, Corrections, Agriculture, Innovation and Technology, and the Criminal Justice Information Authority (between 4 -7). Meanwhile, five agencies (between 5-6) and six agencies reported only one error each.



This broad distribution across agencies suggests that while some compliance issues may be role-specific, others may be correctable with improved internal coordination. Further breakdowns of these errors are explored in detail in the following sections to provide agencies with deeper insight into error trends and training opportunities.

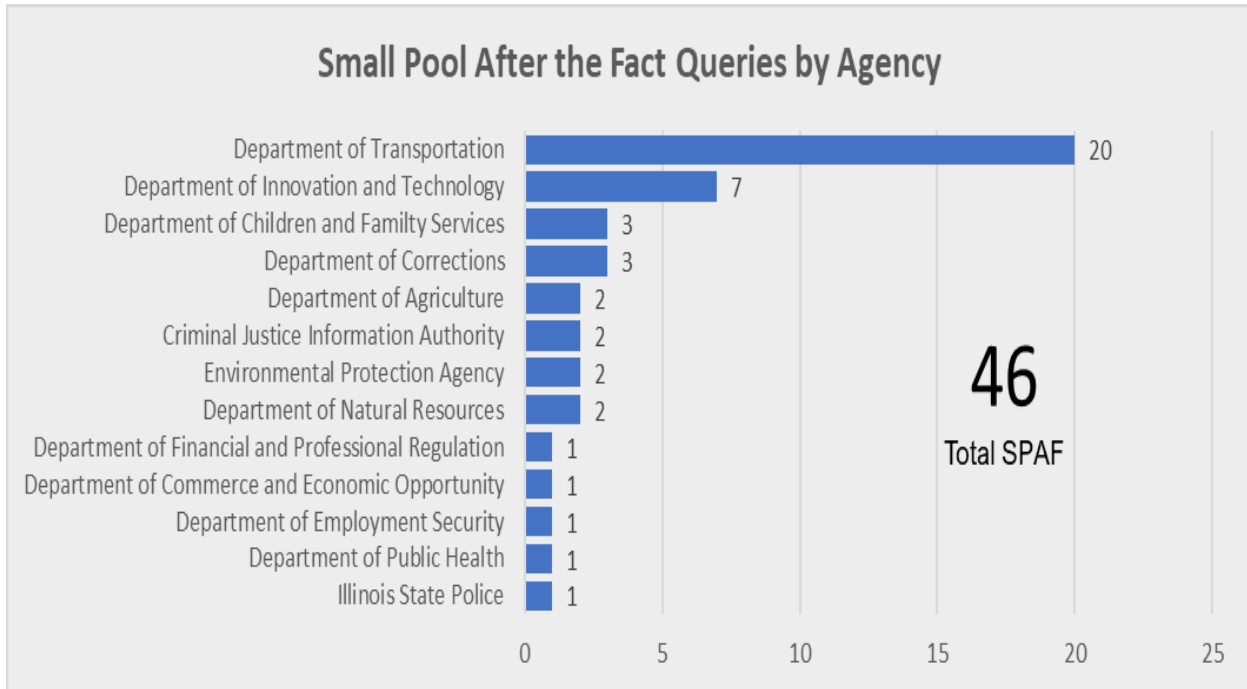


The most egregious of hiring errors, besides a MHE mentioned later in this report, are a Small Pool After the Fact and a CEP 49 Violation. Both are explained and pulled out of the above numbers to give more insight to agencies so they can avoid this type of error in the future.

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. This is a direct violation of CEP policy, which requires agencies to request and receive approval before advancing with hiring decisions based on a limited candidate pool. A total of 46 such errors were reported this period, with Department of Transportation accounting for the largest share. From our 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.

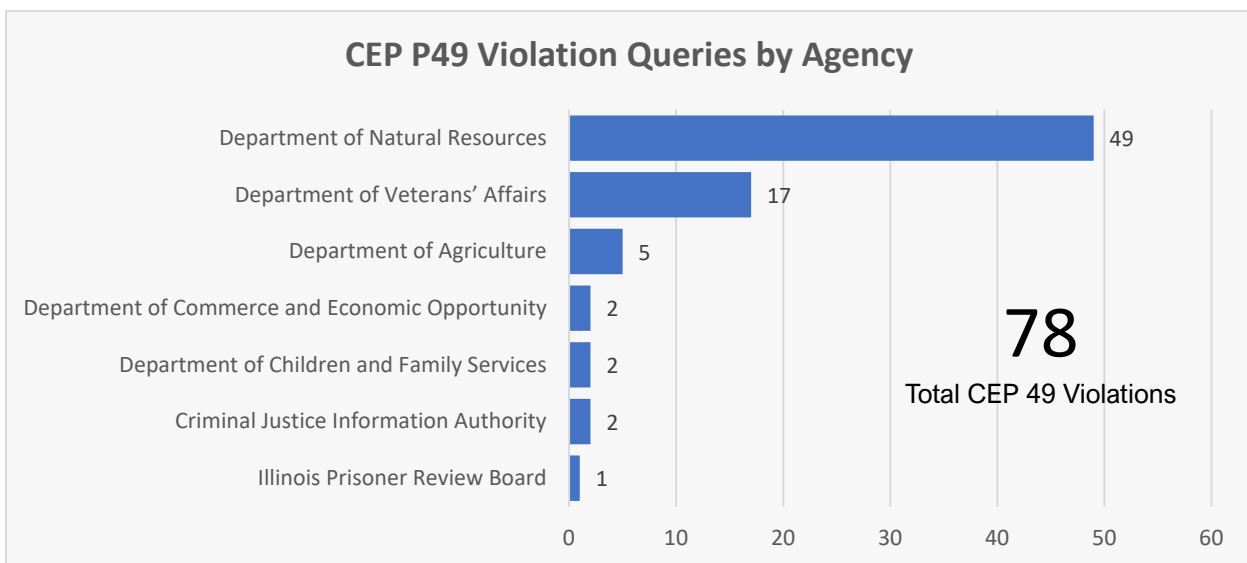




CEP P49 Violation

During this reporting period, 78 CEP P49 violations were reported. These errors occur when an agency makes a job offer before receiving the required CMS approval.

The Department of Natural Resources reported the highest number of violations, largely due to the urgent and seasonal nature of staffing needs for events like state fairs and state park operations. In several cases, agencies proceeded with offers to avoid service disruptions. While the need for timely staffing is common operational challenge, adhering to pre-offer approval procedures remains essential to maintain transparency and fairness in state hiring.

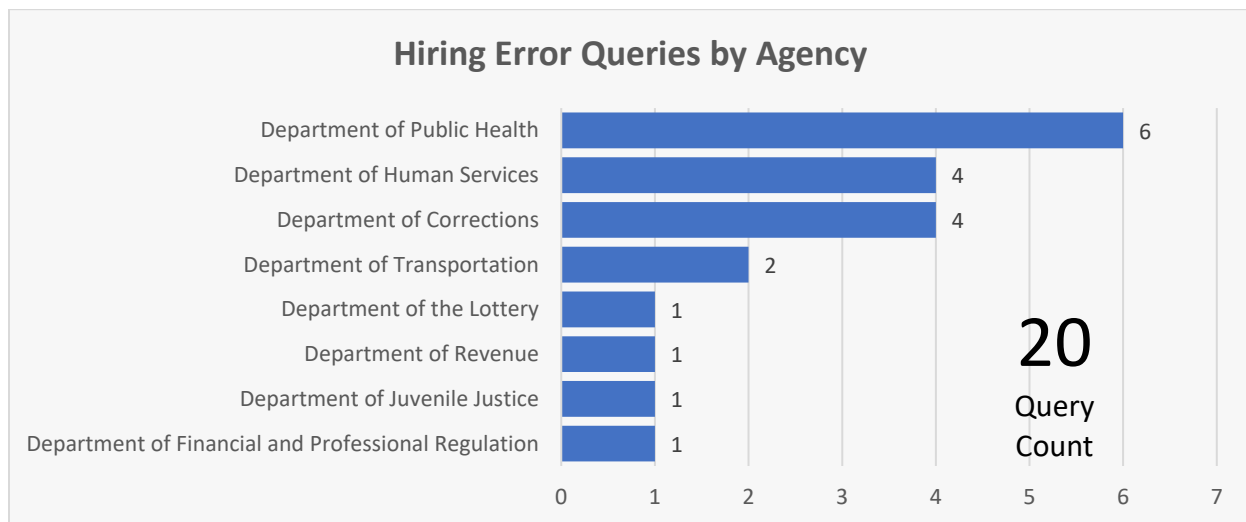


Other EHEs

During the reporting period, the Personnel Compliance team worked to resolve 20 other EHE in addition to those explain above, a decrease from 27 in the previous period.

As shown in the chart below, the Department of Public Health again had the highest number of errors, though reduced from 16 in the last period to six this cycle. Both the Department of Human Services and the Department of Corrections reported four errors each, while Department of Transportation had 2.

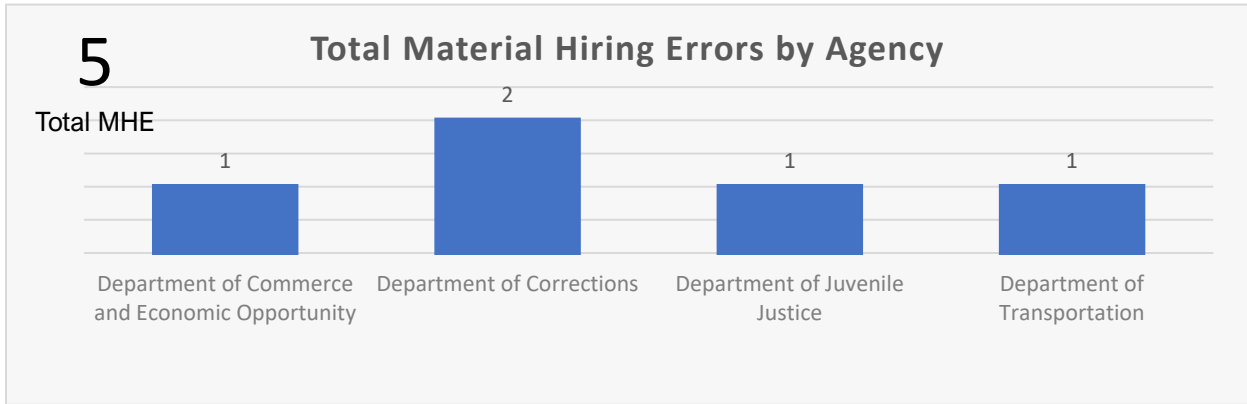
Additionally, four agencies, the Department of the Lottery, Department of Revenue, Department of Juvenile Justice, and Department of Financial and Professional Regulation, each reported a single hiring error.



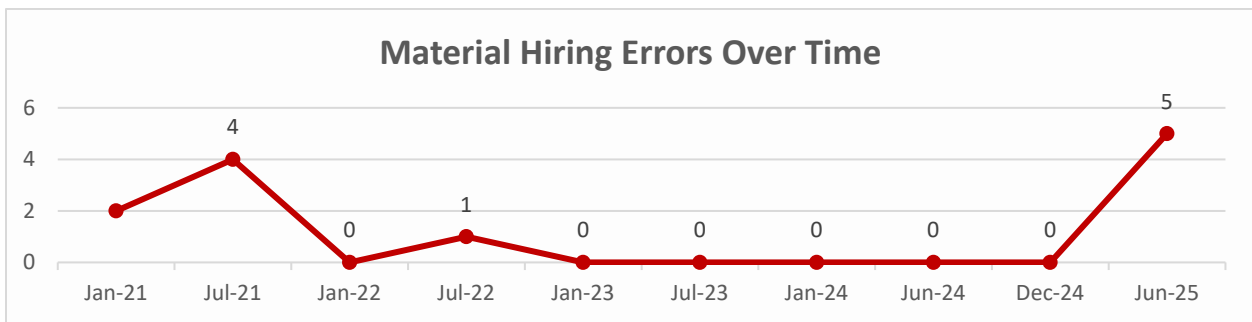
Notably, the Departments of Public Health, Juvenile Justice, and Veterans’ Affairs appeared in both this and the previous reporting period. Their reappearance highlights the need for targeted retraining or closer monitoring, particularly in documenting and executing required CEP steps. By contrast, the Department of Children and Family Services, which had seven errors in the previous report, is not on the current list.

Material Employment Hiring Errors

For the first time since 2022, the reporting period saw a small number of Material Hiring Errors, (MHE) defined as situations where the wrong candidate was hired in violation of CEP policy and began employment. 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, four agencies were responsible for these errors. The Department of Corrections accounted for the highest number with two MHEs although one was submitted as a bypass, while the Departments of Commerce and Economic Opportunity, Juvenile Justice, and Transportation each had one. One of the two MHEs for DOC was not due to their own error but rather an error made at CMS BoP giving the agency the wrong list.

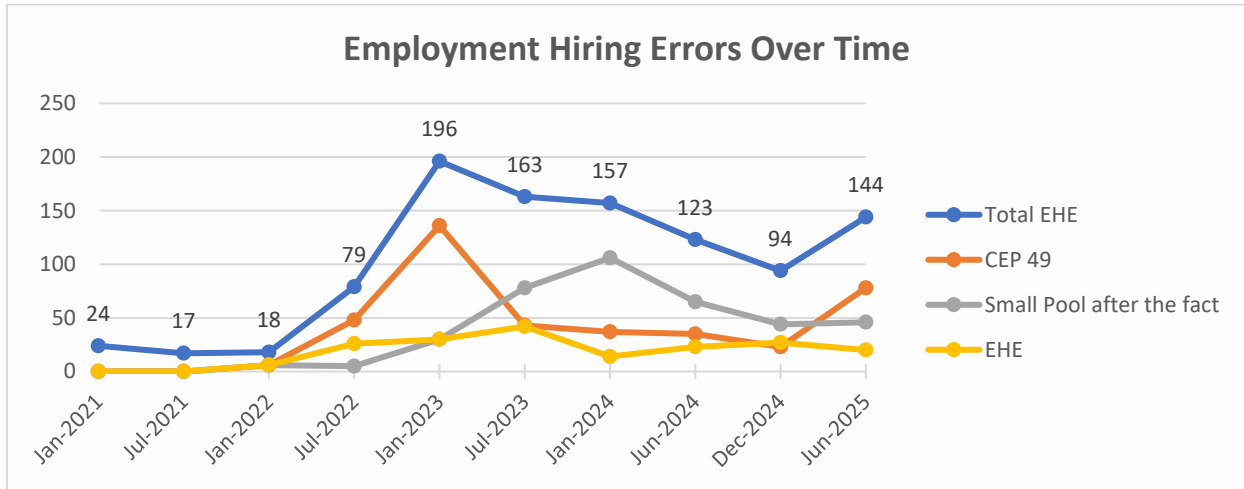


The data above provides a broader historical view of Material Hiring Errors across reporting cycles. While the overall number remains low out of a total of 144 errors, the timing of the reemergence alongside increased total EHEs in 2025 highlights the need for continued oversight and targeted training in specific agencies.

Historical Perspective of Employment Hiring

To give some perspective on the above charts in this section due to increase over previous reporting period research was conducted. The chart below shows a historical view of total EHE, broken down by type and reported over ten cycles from March 2021 through July 2025. This includes all EHEs, Small Pool After the Fact, 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 of 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 current period (144 total EHEs) indicates that further monitoring remains necessary.



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

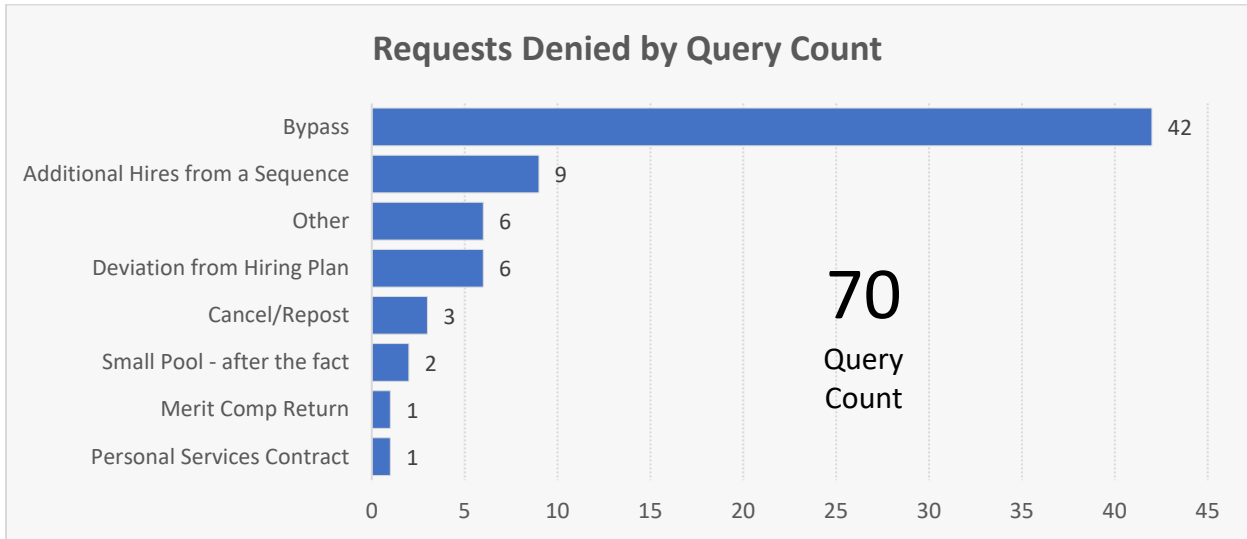
Type of Error	Jan-21	Jul-21	Jan-22	Jul-22	Jan-23	Jul-23	Jan-24	Jun-24	Dec-24	Jun-25
EHE	-	-	6	26	30	42	14	23	27	20
Small Pool after the fact	-	-	6	5	30	78	106	65	44	46
CEP 49	-	-	6	48	136	43	37	35	23	78
Total EHE	24	17	18	79	196	163	157	123	94	144
Material Hiring Errors	2	4	0	1	0	0	0	0	0	5

Denials by Query and Agency

The Personnel Compliance Office 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 70 requests from 14 agencies covering seven query types.

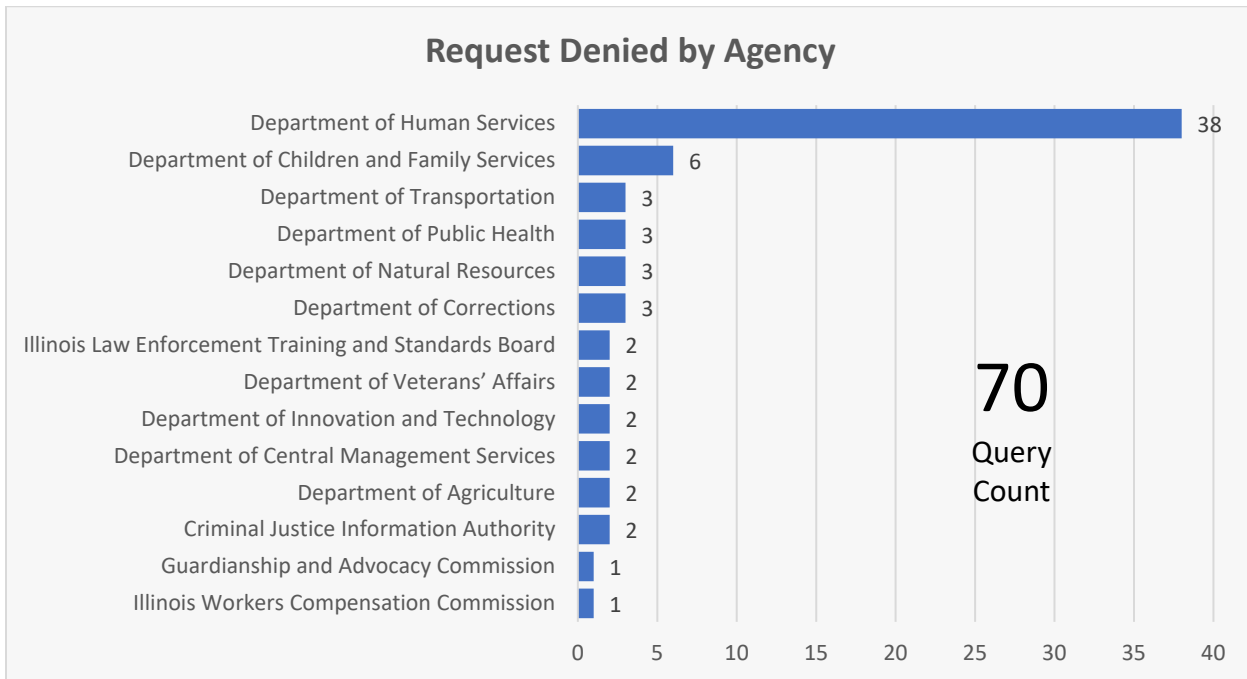
Bypass is consistently the highest denial at 42 which was significantly higher than PSC where only one was denied this reporting period. Across all eight query types, the number of denials ranges between one and 42.





The total denials of 70 was down from 78 during the last reporting period. This could demonstrate a strong partnership between the agencies and Compliance, with most queries being resolved successfully because while our approval rate is high overall, we work hard with the agencies to get there. It could also mean agencies have not had to submit because they are making improvements in their own processes.

The Department of Human Services alone accounted for over half of these denials (38), with the next highest being Children and Family Services at six. Across all 13 agencies who received denials, individual agency figures for denials ranged between one and 38.



Political Compliance

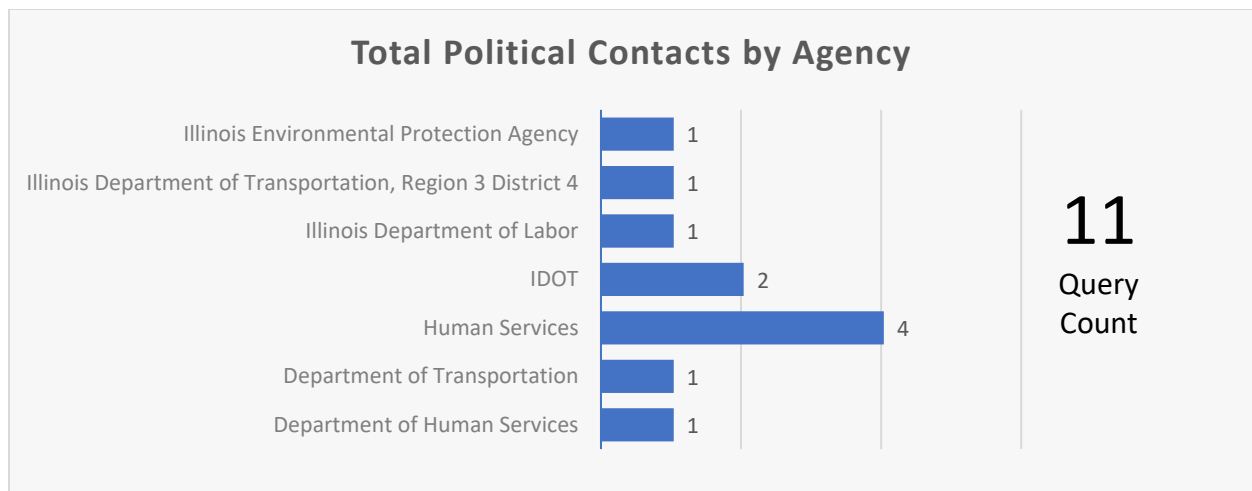
Political Discrimination

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.

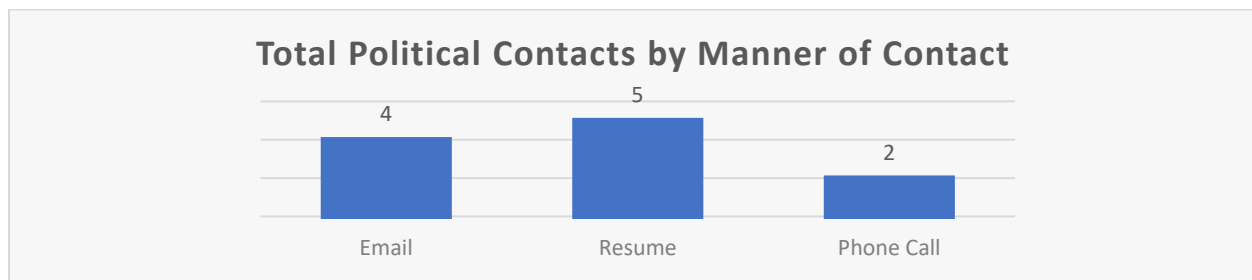
- **Incidents:** There were no reports of political discrimination during this reporting period.
- **Implication:** This absence of reports reflects the stability of the State's and the Governor's reform measures, indicating successful implementation and adherence to anti-discrimination policies.

Political Contacts

- **Incidents:** There were eleven incidents of political contact from seven different agencies.



- **Manner of Contact:** The most common method was via resume submissions (five instances), followed by email communications (four instances) and phone calls (two instances)



Agency Training and Customer Relations

EHEs and Denials play a crucial role in identifying additional training opportunities. The 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, along with personnel from the Hiring and Selection and Personnel Integrity departments at CMS, 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. In addition to the CEP, the key documents referred to during these visits include:

- Personnel Code and Rules
- Transactions Manual
- Hiring Process Training Manual



CMS BoP HRT (Matt Franklin) & Compliance (Shawn Wilson and Donna Skowronski) Site Visit with James Moffatt

Bypass queries are the most time-consuming, requiring careful review and research to ensure compliance with applicable laws, governing documents, and policies. We frequently confer with our partners in CMS Labor Relations and CMS Personnel Legal and engage in extensive communication with the requesting agency to provide accurate responses.

We continue to prepare a slide deck that covers an analysis of data that is specific to each agency visit allowing the Agency Personnel Officer (APO) and staff to gain a deeper understanding of what is submitted. It also helps the 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, utilization rate, query types submitted, and historical data.

Overall, the Compliance Office 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 personnel functions. Currently, the team is working to create and implement a survey that will be distributed to agencies to start analyzing various needs and the quality and content of future visits.

Accomplishments and Future Plans

Current Reporting Period

The Compliance Office completed 29 in-person or virtual agency site visit during the coverage period of this report. The previous chart shows all site visits conducted and scheduled.

Success and Future Goals

The in-person meet-and-greet initiative, started in 2022, has been highly successful and has positively impacted the quality of requests received. The Compliance Office 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

Compliance Training Projects Complete

HRT Transition

The team worked with the CMS Hiring & Recruiting Team to transition several minimally risky queries to be handled by the hiring leads to minimize total time to fill a requisition. We conducted a training, wrote three different agency communications to include a crosswalk telling agencies who to go to related to various hiring situations. Compliance and HRT are now in constant communication via their new team's chat and monthly meetings.

Just in Time Agency Training

PSC Submission training was the most popular of our one-on-one agency requested trainings which included meetings with REV, TIRC, LETSB, and IDEC. The other topic of interest was on CEP reporting requirements, where we also went over the SharePoint submission process demonstrating how to complete both the report and certification with DJJ. Finally, we did a Bypass training following our site visit for DCFS.

Summary

The Compliance Office's efforts to conduct in-person visits annually and provide focused training are aimed at building stronger relationships with State Agencies, enhancing understanding of compliance requirements, and improving the overall efficiency and quality of the hiring process.



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 past one year to ensure valid justification supports the hiring of a PSC. The CMS Chief Compliance Officer 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 Chief Compliance Officer may recommend that a TA or IA that does not adhere to the CEP be ended.

CMS Compliance Report to OEIG HEM – Per paragraph 28 and 96 of the CEP, the CMS Compliance Office 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.

Semi-Annual

Compliance Report – Per paragraph 95 of the CEP, the CMS Compliance Office 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 Material Employment Hiring Errors; (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.

Annual

Compliance Report – Per paragraph 97 of the CEP, the CMS Compliance Office will provide OEIG-HEM an annual report and the Civil Service Commission a listing of all non-Code positions that do not appear on the Exempt List.

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 Chief Compliance Officer.

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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 Personnel Compliance Team: Amy Gurnitz, Julie Brightwell, Shawn Wilson and Donna Skowronski

