



Office of
Executive Inspector General
for the Agencies of the Illinois Governor

Hiring & Employment Monitoring

**Fourth Quarter &
Annual Report**

2025

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Message from Executive Inspector General Susan Haling



It is my pleasure to present the 2025 Annual Hiring & Employment Monitoring (HEM) Report which showcases the Office of Executive Inspector General's (OEIG) compliance and investigative work on State hiring and employment for the 2025 calendar year, as well as hiring-related work conducted during the fourth quarter of 2025.

This year, HEM continued to monitor hiring across State government and provide recommendations for improvement. The following achievements are described in more detail in the report:

- the issuance of 81 Advisories to 40 different agencies, reflecting an increase from last year's record of 38 agencies;
- the completion of 58 desk audits of hiring sequences;
- the handling of 34 new complaint referrals;
- the review of 400 exempt appointment notifications, the highest number to-date; and
- the assessment of 119 Exempt List modification requests, also a record high and includes both addition and deletion requests.

This year, in collaboration with the Illinois Department of Central Management Services (CMS), HEM revised the Relationship Disclosure & Conflict of Interest Certification forms, reducing it to one form with the intent to increase effectiveness. HEM also worked with CMS, Illinois Department of Human Services (IDHS), and Illinois Department of Corrections (IDOC) staff to implement changes to the qualifications, validation, and hiring process for Stationary Engineers & Firemen throughout State government – a title that has been the basis of numerous hiring complaints.

In addition to this work, the OEIG Investigative Division received a record number of hiring-related complaints: 169. The OEIG Investigative Division closed 19 investigations related to hiring this year and issued two hiring-related founded reports. In addition, two hiring-related founded reports were made available to the public.

We remain committed to ensuring that hiring in State government is free from corruption. This requires consistent vigilance through monitoring, continued education and training, collaborating with agency personnel, and adjusting policies and processes as new issues arise.

Sincerely,

Susan M. Haling
Executive Inspector General



I. Overview

Office of Executive Inspector General for the Agencies of the Illinois Governor

The State Officials and Employees Ethics Act (Ethics Act), 5 ILCS 430/1, et seq., established the Office of Executive Inspector General for the Agencies of the Illinois Governor (OEIG) in 2003. The OEIG is an independent executive branch State agency. The Ethics Act authorizes the OEIG to investigate allegations of fraud, waste, abuse, mismanagement, misconduct, nonfeasance, misfeasance, malfeasance, and violations of the Ethics Act (such as prohibited political activity, sexual harassment, the gift ban, and retaliation) and other related laws and rules. The OEIG also investigates allegations of hiring improprieties and conducts compliance-based reviews of employment procedures and decisions. In addition, the OEIG plays a vital role in reviewing Ethics Act-mandated trainings and conducting revolving door determinations.

The OEIG has jurisdiction over:

- more than **170,000** State employees, appointees, and officials, including the Governor and the Lieutenant Governor;
- more than **300** executive branch State agencies, departments, boards, and commissions;
- the **nine** State public universities across a dozen campuses;
- the **four** Chicago area Regional Transit Boards (the Regional Transportation Authority, the Chicago Transit Authority, Metra, and Pace);
- **eleven** Regional Development Authorities; and
- vendors and contractors of any of those entities.

Executive Team

Susan M. Haling,
Executive Inspector
General

Neil P. Olson,
General Counsel

Fallon Opperman,
Deputy Inspector
General and
Chief of Chicago
Investigative Division

Erin K. Bonales,
Director of Hiring
& Employment
Monitoring Division

Christine Benavente,
Deputy Inspector
General - Executive
Projects

Angela Luning,
Deputy Inspector
General and Chief
of Springfield
Investigative Division

Ogo Akpan,
Chief Fiscal Officer
and Operations
Manager

Investigative Division

The OEIG receives complaints from many different sources, including members of the public, State employees, law enforcement officials, contractors, and individuals requesting to remain anonymous. In the absence of consent from a complainant, the OEIG is required to ensure that the identities of complainants are and will remain confidential unless otherwise required by law.

The OEIG evaluates all new complaints to determine the appropriate action. To conduct investigations, OEIG investigators interview witnesses, collect documents, analyze records, conduct surveillance, perform computer forensics, and use a variety of other investigatory tools and techniques. The OEIG also has subpoena power to obtain information relevant to an investigation. Investigations are governed by the OEIG's Investigation Policy and Procedures Manual, the Illinois Administrative Code, and other applicable laws, rules, policies, and regulations, which can be viewed on the OEIG's website.

In Fiscal Year 2025 (FY2025), the OEIG processed 3,907 complaints, opened 211 investigations, referred 3,374 complaints and/or investigations to other agencies or appropriate entities, and administratively closed 251 complaints. The OEIG completed 228 investigations. Also, in FY2025, 153 founded reports were made public by the Executive Ethics Commission (EEC). Those reports can be found on the OEIG website here: [Founded OEIG Investigative Reports](#).

Anyone seeking to report wrongdoing to the OEIG may:

- file a complaint online at oeig.illinois.gov;
- call the OEIG at 866-814-1113;
- TTY at 888-261-2734; or
- mail a printed copy of a complaint form to the OEIG Springfield or Chicago offices.

The OEIG has complaint forms available in both English and Spanish.

You may report alleged violations to the OEIG anonymously. When filing a complaint, please ensure that there is sufficient detail concerning the allegations for an investigation to be initiated.

Hiring & Employment Monitoring Division

The Ethics Act directs the OEIG to “review hiring and employment files of each State agency within [its] jurisdiction to ensure compliance with *Rutan v. Republican Party of Illinois* ... and with all applicable employment laws.” 5 ILCS 430/20-20(9). In keeping with this mandate, the OEIG created the Hiring & Employment Monitoring (HEM) Division, which conducts compliance-based reviews of State hiring and employment procedures and decisions and provides recommendations in order

HEM Team

Erin K. Bonales,
Director

Tonya Neal,
Supervising Analyst

Jackie Mullings,
Project Manager

Claire Roche,
Attorney

Natale Fuller,
Attorney

Porsha Winters,
Attorney

Viktorija Legge,
Analyst

Amanda Thomet,
Analyst

Keshia Wrightsell,
Analyst

Koen Varley,
Analyst

to help improve the efficiency and quality of State hiring. HEM monitors hiring sequences (which includes in-person or virtual real-time monitoring of interviews), conducts desk audits, reviews complaint referrals, and monitors political contacts.

In addition, HEM reviews all requests to add or delete positions from the State’s Exempt List. The Exempt List is a comprehensive list of positions for which hiring and employment decisions may be made on the basis of political or other non-merit factors. In addition to approving changes to the Exempt List, HEM staff also reviews all appointments made into these at-will positions to ensure that the selected candidates are minimally qualified for their positions.

HEM also ensures compliance with the State’s Comprehensive Employment Plan (CEP), which sets forth general principles applicable to all hiring and implements hiring processes for both exempt and non-exempt positions.

HEM reports on its work by issuing quarterly and annual reports as well as Advisories which summarize HEM’s review and make recommendations. In Calendar Year (CY) 2025, HEM issued 81 Advisories, involving 40 different agencies. From January 1, 2025 to December 31, 2025, HEM staff monitored 8 hiring sequences and completed 58 desk audits. HEM staff also reviewed 400 exempt appointment notifications and received 119 Exempt List modification requests. The OEIG’s Quarterly and Annual HEM Reports can be found on the OEIG’s website here: [**HEM Quarterly and Annual Reports.**](#)



II. Developments & Updates

New Hiring Procedures and Processes

Disclosure Form Revisions and Rollout

This calendar year, HEM distributed thirteen Advisories that addressed issues with the Relationship Disclosure & Conflict of Interest Certification form (Disclosure Forms) process. These Advisories included recommendations that:

- Human Resources staff take related annual training timely;
- all discussions and factors that aid in determining whether a conflict exists is documented in the “additional comments” portion of the Disclosure Form;
- all Disclosure Forms and related communications are uploaded in SuccessFactors; and
- the conflict vetting process is improved by ensuring there are timely follow up on conflict disclosures, subordinates are not vetting potential conflicts of their superiors, and an employee who is not otherwise involved in the hiring sequence is assigned to vet the Disclosure Forms.

In light of these reviews, HEM determined that additional changes to the Disclosure Form may assist with these recommendations. HEM worked with CMS to revise the process, combining the current forms into one Disclosure Form for Screeners and Interviewers. CMS announced the changes on the November 25th Statewide Personnel Labor Call and plans to provide additional training in January 2026. The new form is available on the CMS Personnel Workbench, and Agencies are expected to utilize it going forward.

HEM Reviews Lead to Statewide Improvements

In the first quarter of 2025, HEM issued Advisory 24-HEM-0018 regarding the review of hires into Stationary Engineer and Stationary Fireman titles at CMS, IDHS, and IDOC. These positions are generally responsible for operating the boiler and heating systems within State agency facilities, including ensuring that the equipment is safe and running properly. In the nine sequences reviewed, HEM observed several consistent problem areas and made several recommendations. Last quarter, CMS, IDHS, and IDOC responded to HEM’s recommendations, agreeing that the current classification specifications for Stationary Engineer and Stationary Fireman roles, as well as the corresponding position descriptions, were

unclear or inaccurate. The agencies shared detailed proposed changes to the specifications. In addition, CMS noted that it is taking additional steps to improve its validation process, including establishing and filling a CMS Staff Development Specialist position responsible for training both Hiring and Selection Division staff and agency staff who draft and establish position descriptions. CMS also created and filled a CMS Quality Control Coordinator position tasked with reviewing validation and ensuring consistency and transparency in the validation. Finally, in response to HEM's recommendations, the agencies agreed that a Standardized Hiring Plan (SHP) that includes a Subject Matter Expert review and/or interview should be utilized for selection of these positions. They also noted their respective efforts to hire and utilize staff with expertise in these areas, to provide guidance to teams working on these postings and assessing applicant qualifications.

HEM continues to work with CMS and the agencies on implementing the requisite changes for these Stationary Engineer & Fireman classifications and titles.

Reminders Based on HEM Advisory Recommendations

Reducing the Need to Repost

In response to a complaint referral, HEM reviewed the hiring sequence for an Illinois Department of Veterans Affairs (IDVA) Grants Administrator position and found that the salary offers made to the candidates were inconsistent (See 24-HEM-0080). After several candidates declined the position, the agency decided to raise the salary offer for the next ranked candidate. Proceeding this way, however, would result in inconsistent and potentially unfair salary offers. Rather than pursuing a repost, HEM asked IDVA to extend the revised salary offer to the initial top-ranked candidate, and if declined, then to proceed to each candidate in order; IDVA agreed, did so, and obtained a hire. As a result of this review, HEM reminds CMS and agencies to consider and consult HEM/CMS Compliance regarding other ways to maintain the integrity of the sequence that do not include wasting resources and time that may result from canceling and reposting a sequence.

Using the Same Interview Materials

Using the same interview questions and ideal responses in multiple interview sequences can interfere with merit-based selection by increasing the number of individuals who are exposed to or have access to these materials. For instance, when an agency reposts a position following a previous unsuccessful sequence

and uses the same interview questions as before, this may give any candidates interviewed in both sequences an unfair advantage over other interviewees. Additionally, the repeated use of the same interview materials in multiple sequences or for different positions increases the number of employees at an agency with exposure to the materials, raising the potential for wrongdoing.

In 2025, HEM issued two Advisories (See 25-HEM-0013 and 25-HEM-0009) which included recommendations regarding the repeated use of interview materials. In response, both agencies committed to creating question banks with additional interview materials for agencies to draw from in subsequent sequences.

Documenting the Interview

This year, eight of HEM's Advisories addressed the need for better documentation of the interview – from taking detailed notes to justifying adjusted scores and documenting interviewer discussions. These Advisories are detailed more in this report.

The Importance of SME Reviews

After CMS identifies which applicants meet the minimum qualifications of a position, the agency Subject Matter Expert (SME) reviews the applicants based on the position's preferred qualifications. The SME review is an important part of the applicant screening process, intended to ensure only the most qualified applicants are advanced to the candidate interview phase. It is critical that the SME consider all of the information pertaining to an applicant's qualifications, identify and clarify vague qualification language, and consistently screen applicants.

In 2025, HEM made recommendations or reminders regarding the SME review in eight Advisories, detailed in this report. In response to these Advisories, the agencies agreed to have staff retake CMS SME Review Training, provide additional training and instruction to SMEs, and in one instance, remove an employee from participating in SME role in the future.



III. HEM's Compliance Reviews

To ensure State hiring complies with governing policy and law, HEM uses multiple strategies and resources to evaluate and make recommendations on the State's hiring practices and processes. To review hiring, HEM monitors hiring sequences in real-time, conducts desk audits of hiring files utilizing the State's electronic hiring system, and accesses the State's human resources or personnel information systems. HEM also works closely with agency personnel staff, CMS Hiring Reform Team members, and CMS Compliance to review systemic issues that involve a particular hiring-related process, position, unit, or agency. While some HEM compliance reviews are selected randomly, such as many desk audits, other reviews are based on complaint referrals or on recurring issues or issues that need further review. HEM also uses its previous reviews to determine which agencies and issues may need attention.

Hiring Sequence Monitoring

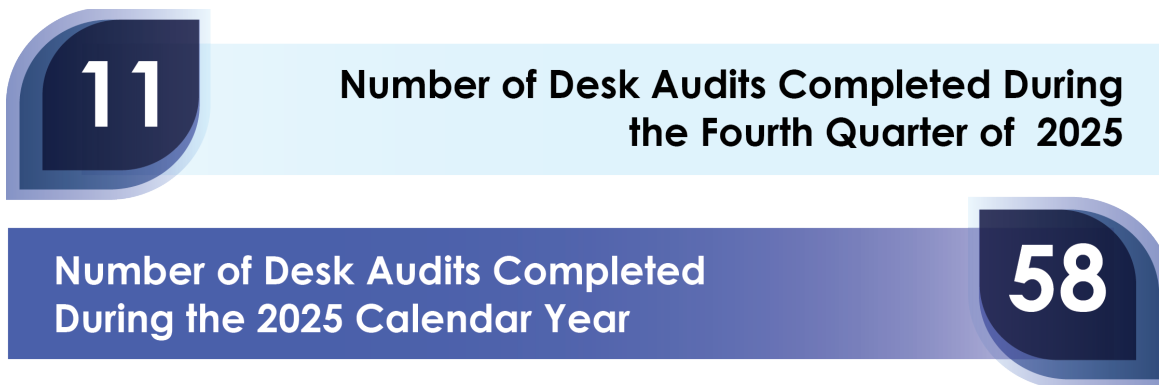
One of the ways HEM assesses agency compliance with the CEP and other governing authority is by monitoring hiring sequences at State agencies in real-time. HEM selects sequences to monitor in various ways; some are selected based on HEM's review of agency postings in SuccessFactors, the State's electronic hiring system, or communication with CMS Compliance or agency human resources personnel. When HEM monitors a hiring sequence, in addition to observing all interviews, HEM is involved with the agency from the beginning to the end of the hiring sequence, starting with reviewing the work that occurs before the agency posts the position - which includes updating the position description and drafting application questions, screening criteria, interview questions and ideal answers - and concluding with the hire of the successful candidate.

**Number of Hiring Sequences Monitored
During the 2025 Calendar Year**

8

Desk Audits

In addition to monitoring interviews, HEM completes desk audits of agency hiring sequences. When HEM conducts a desk audit of a hiring sequence, HEM reviews all documentation related to the sequence, as it would for a monitored sequence, but does not observe the actual interviews and instead thoroughly reviews the interview paperwork to ensure the selection decision was merit-based and justifiable. This review can take place as the hire is proceeding or after a sequence has concluded. HEM generally selects these sequences by reviewing SuccessFactors or in response to a complaint referral.



Complaint Referrals

Upon receipt of a complaint, the OEIG's Investigative Division performs an initial review of the allegations, which must be completed within 30 days. After this initial review, the OEIG has the discretion to open an investigation, refer to HEM for a hiring compliance review, and/ or refer to other entities, as it deems appropriate. A complaint is often referred to HEM if it involves allegations of a violation of the CEP or a breach of a hiring-related procedure or policy. HEM's compliance function and knowledge of State hiring procedures allow HEM to efficiently evaluate whether a hiring sequence was conducted appropriately. If a violation is discovered that may have impacted the outcome of a hiring sequence, HEM can often intervene before, during, or shortly after the violation occurred, to remedy the issue.

6**Number of Hiring-Related Complaints Referred to HEM During the Fourth Quarter of 2025****Number of Hiring-Related Complaints Referred to HEM During the 2025 Calendar Year****34**

Other HEM Reviews and Actions

In addition to evaluating hiring files and monitoring interviews, HEM also analyzes broader hiring issues ranging from how an agency is vetting its Disclosure Forms to whether there is a systemic pattern of hiring issues at an agency that needs correction or additional guidance. HEM's reviews frequently require follow-up with the agency personnel staff or CMS. The results of these reviews are also described in written Advisories issued to the agency and the Governor's Office.

During the course of a review, if HEM identifies issues of possible hiring-related wrongdoing that suggest misconduct or may involve political manipulation, as opposed to hiring errors, HEM may transfer the matter to the OEIG Investigative Division for a more in-depth investigation involving OEIG interviews.

Number of HEM Reviews Transferred to the OEIG Investigative Division During the 2025 Calendar Year**1**

Summary of HEM Compliance Actions Taken

| Fourth Quarter 2025 | Count |
|---|-------|
| Hiring-related reviews opened | 22 |
| Hiring sequences monitored | 0 |
| Desk audits completed | 11 |
| Complaints referred intra-Office to HEM | 6 |
| Hiring reviews transferred to the OEIG Investigative Division | 0 |
| Hiring reviews administratively closed | 3 |
| Advisories issued | 17 |

| Calendar Year 2025 | Count |
|---|-------|
| Hiring-related reviews opened | 97 |
| Hiring sequences monitored | 8 |
| Desk audits completed | 58 |
| Complaints referred intra-Office to HEM | 34 |
| Hiring reviews transferred to the OEIG Investigative Division | 1 |
| Hiring reviews administratively closed | 11 |
| Advisories issued | 81 |



IV. HEM Advisories

At the conclusion of a HEM review, HEM issues a written Advisory that is transmitted to the chief Agency Personnel Officer and the CMS Chief Compliance Officer, with copies to the Governor's Office and the head of the Agency. The Advisory includes:

- a summary detailing the subject and scope of the review;
- a description of HEM's conclusions regarding compliance with applicable rules and procedures; and
- recommendations on how to proceed, if necessary.

| Advisories Issued in 2025 | | | | | |
|------------------------------------|---------------|----------------|---------------|----------------|-------|
| | First Quarter | Second Quarter | Third Quarter | Fourth Quarter | Total |
| Total Advisories Issued | 21 | 21 | 22 | 17 | 81 |
| Advisories with No Recommendations | 15 | 15 | 14 | 9 | 53 |

Some Advisories result in HEM finding that the agency's selection for the position was merit-based and justifiable without any recommendations.

| Advisories with No Recommendations – Fourth Quarter 2025 | | | |
|--|--------|--|--------------------|
| Advisory | Agency | Position Title | Type of Review |
| 25-HEM-0060* | IDPH | Plumbing Consultant | Desk Audit |
| 25-HEM-0067 | IDFPR | Mortgage Examiner Manager | Desk Audit |
| 25-HEM-0071* | IDHHC | Chief Operating Officer | Desk Audit |
| 25-HEM-0066* | IGB | Human Resources Manager | Desk Audit |
| 25-HEM-0072 | HFS | Personnel & Administrative Services Administrator | Desk Audit |
| 25-HEM-0051 | DCEO | Workforce Reporting, Performance Unit Manager | Desk Audit |
| 25-HEM-0078 | DoIT | Deputy Chief of Enterprise Application Services (EAS) Operations | Desk Audit |
| 25-HEM-0063* | AGR | Bureau of Weights and Measures | Complaint Referral |
| 25-HEM-0076 | IDFPR | Mortgage Company Licensing Manager | Desk Audit |

*Summaries of these reviews are included below because they contain reminders.

HEM Advisory Summaries

Advisories issued in the Fourth Quarter that included a HEM recommendation or reminder, or recognized agency work, are summarized below. In some cases, HEM requested a formal response from the agency, which is also summarized. Summaries of the Advisories that made recommendations in the first three quarters of the year are available in the previously issued quarterly reports available on the [OEIG website](#).

Interview Question Integrity

23-HEM-0026/25-HEM-0038

In response to two separate complaint referrals, HEM reviewed two IDOC Parole Supervisor hiring sequences occurring in 2023 and monitored another two sequences in 2025. HEM made two recommendations and shared several reminders. In the 2025 sequences, HEM found that the then-Chief of Parole bypassed Central Human Resources and utilized his own interview questions. While IDOC Human Resources handled the situation appropriately, the cancellations and reposts that cost the State unnecessary time and resources. HEM recommended that the then-Chief receive a copy of the Advisory and acknowledge his agreement to follow the appropriate processes for future sequences for covered positions.

Additionally, while monitoring the interview scoring in May 2025, HEM discovered that Parole Division candidates had not had a recent performance evaluation – the most recent performance evaluations were dated 2022-2023. HEM recognized that there have been vacancies in many of the leadership positions in the Parole Division but also recommended that IDOC ensure that performance evaluations are implemented as soon as possible and completed consistently going forward.

HEM also commended IDOC for ensuring interviews were scored appropriately and for completing the scoring process timely. Additionally, IDOC implemented Disclosure Forms for the 2025 sequences, and HEM reiterated that going forward, IDOC obtain and vet Disclosure Forms for all interviewers in all sequences that utilize promotional tools. HEM also reminded the agency to allow sufficient time between interviews so that interviewers have time to score all of the categories and to carefully review the final scoresheet to ensure errors do not occur that result in the wrong candidate being made an offer.

Finally, HEM noted that two applicants who did not have the required experience were deemed qualified because they had a validation score notice or valid UMP grade notice. HEM reminded the agency to discuss with CMS how to ensure that additional minimum requirements not included in the class specification's minimum qualifications, but that are position-specific, are incorporated in the hiring process in those circumstances.

Vetting Disclosure Forms

24-HEM-0089

In response to a complaint referral, HEM reviewed the hiring sequence for six vacancies of the Human Resources Representative position at the Illinois State Police (ISP). HEM found the selection decisions to be merit-based and justifiable, including the selection of the candidate named in the complaint. However, upon determining that one of the interviewers had not disclosed that she had previously worked, and was friends on social media, with the mother-in-law of one of the selected candidates, HEM recommended that in the future, ISP ensure that hiring sequence participants fully disclose the nature of their relationships with candidates, including any relationships they are aware of with a candidate's close relatives. To better safeguard against allegations of steering or manipulating hiring sequence decisions, HEM also recommended that the interviewer and other managerial employees refrain from having their subordinate staff decide whether they are conflicted or should participate further in a hiring sequence, which the interviewer confirmed to HEM she would do going forward. While HEM did not request a response to this Advisory, ISP responded, stating it would implement four new Standard Operating Procedures (SOPs). Respectively, these SOPs: (1) expand the types of relationships that must be disclosed; (2) require all employees who participate in hiring sequences to complete annual conflict of interest training; (3) ensure Disclosure Forms are independently reviewed by a neutral party; (4) and provide that Disclosure Forms and determinations must be maintained within the hiring file and subject to periodic audit.

25-HEM-0071

HEM conducted a desk audit review of the hiring sequence for the Chief Operating Officer position at the Illinois Deaf and Hard of Hearing Commission (IDHHC). HEM found that the selection decision was merit-based and justifiable but provided reminders regarding Disclosure Forms. HEM reminded IDHHC to ensure interviewers are completing the Interviewer Disclosure Form (as opposed to the Meaningful Input Disclosure Form) to document their roles as panelists. HEM also reminded IDHHC to ensure that hiring sequence participants carefully review the form and do not check conflicting boxes, as this can create confusion

as to whether these employees have relationships with candidates. HEM also noted that if a participant checks conflicting boxes, the employee reviewing the form should follow up with the participant to resolve the discrepancy. Lastly, HEM reminded IDHHC that it is best practice to assign an employee who is not otherwise involved in the hiring sequence to vet the Disclosure Forms, rather than having an interviewer sign-off on a co-interviewer's form. HEM recognized that IDHHC is a small State entity and noted that if it was not feasible for an uninvolved employee to review the forms, IDHHC should consider asking an employee from another agency to vet the forms. Although HEM did not request a response to this Advisory, IDHHC responded, stating it would ensure all Disclosure Forms are completed accurately and reviewed appropriately going forward.

25-HEM-0030

HEM conducted a desk audit of the hiring sequence for a Dietary Manager II at the Illinois Department of Veterans Affairs (IDVA). HEM found that the day before interviews were scheduled to begin, the IDVA Hiring Manager determined that one of the interviewers had a conflict and emailed the interviewer that she was not allowed to proceed further. Rather than replace the interviewer – which the CMS Compliance Officer noted would be the preferred option, the Hiring Manager reversed course the next day at the start of interviews and allowed the interviewer to participate as a scoring panelist. The Hiring Manager's issues with the interviewer persisted through the interview phase and were raised approximately three weeks after interviews were concluded. The Hiring Manager's concerns were later withdrawn after the CMS Compliance Officer noted the similarity in scores between the interviewer and the Hiring Manager. While HEM found the selected candidate qualified, HEM recommended that IDVA staff ensure that potential or actual conflicts of interest are timely raised to and resolved by CMS, so that appropriate action can be taken before the hiring sequence proceeds further. HEM also recommended that CMS revisit after-the-fact approvals and consider other ways to proceed to ensure the integrity of hiring decisions, which will also help alleviate the difficulty in retroactively determining if a participant's involvement negatively impacted a hiring sequence.

25-HEM-0066

HEM conducted a desk audit of the hiring sequence for Human Resources Manager at the Illinois Gaming Board (IGB). While HEM did not make any formal recommendations, HEM reminded IGB that it is best practice to assign an employee who is not involved in the hiring sequence to vet the Disclosure Forms, rather than having an interviewer sign-off on a co-interviewer's Disclosure Form, particularly if one is a subordinate of the other.

25-HEM-0063

In response to a complaint referral, HEM reviewed the hiring files for two sequences within the Illinois Department of Agriculture's (AGR) Bureau of Weights and Measures. While HEM did not make any formal recommendations, HEM reminded AGR of another Advisory, issued after this sequence occurred, which discussed communications between AGR Human Resources staff and participants that were not documented in the Disclosure Forms and, therefore, not reflected in the hiring record. In response to that Advisory, AGR noted that they will document all conversations via email and include those responses with the signed Disclosure Forms.

Minimum and Preferred Qualifications

25-HEM-0068

HEM conducted a desk audit of a hiring sequence for a Guardianship Representative at the Illinois Guardianship and Advocacy Commission (IGAC). While HEM found the selected candidate to be qualified, HEM made several recommendations and a request. In this sequence, the first preferred qualification was weighted at 60%. If an applicant did not meet the first preference, they lost 60 points, resulting in a maximum score of 40. Since the minimum application score was set at 70, these applicants were not eligible for interview. While the heightened weight did not appear to drastically reduce the interview pool which was still large after the SME review at 37 applicants, HEM reiterated that the reason for having preferences is to distinguish, not disqualify, applicants. Thus, HEM requested that IGAC and CMS discuss and reach an agreement on the requirements and preferences for this position and provide HEM with the final position description.

HEM also recommended that in the future, the agency update the position description prior to posting, so that the posting, application questions, and screening reviews are consistent. HEM noted that the second preferred qualification, listed with the others on the job description with the verbiage, "in order of significance," was re-ranked, and moved from the second to the third position in the application questions.

Regarding the SME review, HEM found that the SME was inconsistent in evaluating three applicants. While this error and inconsistency did not result in excluding an applicant who should have been invited to interview, HEM recommended that the agency review this Advisory with the SME.

HEM also discovered a date discrepancy on a participant's Meaningful Input Disclosure Form. HEM recommended that Human Resources (HR) not add dates

to the Disclosure Forms prior to them being completed and signed. Additionally, the SME's Disclosure Form reflected that his form was vetted after the SME review and the interviews were completed. While the SME did not disclose any relationships, HEM reiterated that those serving as screeners and interviewers must not only complete a Disclosure Form prior to participating in the sequence, but the form must also be vetted by the Agency Personnel Officer or designee prior to any participation. HEM requested that IGAC HR review its internal Disclosure Form processes to ensure that the forms are being vetted timely, and that HR staff take responsibility for notating on the form or in SuccessFactors any follow-up. HEM requested a response which was not yet due this calendar year.

25-HEM-0062

HEM monitored the interviews for a Chief Administrative Law Judge (ALJ) at the Illinois Property Tax Appeal Board (PTAB). In 2024, HEM had completed a desk audit of a previous sequence for the same position, for which it issued an Advisory (24-HEM-0015) in May 2024. In the previous review, HEM found that the selection decision was merit-based and justifiable but recommended that PTAB correct the minimum qualifications to four years of professional experience in the practice of law prior to posting the Chief ALJ position again in the future. Despite HEM's recommendation in Advisory 24-HEM-0015, HEM found in the instant review that PTAB had again posted the Chief ALJ without any professional experience required. HEM reviewed the six applicants who applied to the 2025 sequence and determined that all possessed more than four years of experience practicing law; thus, it was determined in collaboration with PTAB and CMS Compliance that PTAB could proceed without canceling the sequence and reposting the position. While HEM found the final selection decision to be merit-based and justifiable, HEM reiterated its recommendation from the previous Advisory that before posting any position, PTAB should ensure that the appropriate minimum qualifications are included in the job posting and applicant screening questions. HEM also reminded PTAB that per CMS guidance, all interviewers must document on their individual scoresheets when a scoring discussion occurred, even if the discussion does not result in any panel member changing his or her original score.

25-HEM-0026

In follow-up to previous hiring sequence monitoring at the agency, HEM monitored the interviews for the newly established Director of the Institute to Innovate ("i2i") at the Illinois Criminal Justice Information Authority (ICJIA). During the original posting period, HEM identified an error involving the minimum qualifications for the position as set forth in the job posting and related applicant screening questions. Specifically, while the position is classified as a Senior Public Service Administrator (SPSA), which should require the equivalency of four years of college

and four years of relevant professional experience in accordance with the CMS classification specifications, the original posting for the position only included the education requirement, with no professional experience required. After HEM brought this issue to the attention of ICJIA and the assigned CMS Hiring Lead, ICJIA canceled the original posting and reposted the position with the correct minimum qualifications. However, HEM's initial follow-up with the CMS Hiring Lead and his supervisor revealed confusion regarding the required qualifications for an SPSA title. Therefore, HEM recommended that going forward, CMS Hiring Resource Team (HRT) staff familiarize themselves with the general classification specifications for common State titles, and that ICJIA staff do the same for common titles at their agency, to assist in avoiding and identifying errors and ensure that only appropriately qualified candidates are given the opportunity to compete for the position.

HEM also included two additional reminders in this Advisory, for CMS and ICJIA, respectively. First, based on the Hiring Lead's incorrect disqualification of a qualified applicant, which was reversed after HEM intervened, HEM reminded CMS validators to ensure they are carefully and thoroughly reviewing applicant materials to ensure applicants are not inadvertently excluded from competing for opportunities for which they are qualified. Second, HEM reminded ICJIA that per CMS guidance, the assigned Subject Matter Expert (SME) should not participate in candidate interviews in any capacity, even as a non-scoring Proctor.

While HEM did not request a response to this Advisory, ICJIA provided a response in which it committed to taking steps to prevent similar issues from happening again in the future. First, ICJIA stated it would provide training for HR staff on the CMS classification specifications for common ICJIA titles. ICJIA also stated that prior to posting any new or revised position, it would collaborate with CMS HRT and Classifications staff to ensure consistency between the minimum qualifications and the applicable classification specifications. Lastly, ICJIA said it would maintain clear documentation and approvals to improve transparency and accountability throughout the hiring process.

Subject Matter Expert Review

24-HEM-0072

In response to complaint referrals regarding two separate hiring sequences, HEM reviewed four hiring sequences for the IDOC Shift Supervisor title. While HEM found the selection decisions to be merit-based and justifiable, HEM made two recommendations. In one sequence, two applicants appeared to meet the minimum qualifications based on their titles but were disqualified by the CMS

validator for not including their job duties. HEM recommended that CMS consider providing written notice in the application process stating that detailed responses are needed and that including a position title alone will not provide credit. Additionally, HEM recommended that IDOC provide SMEs consistent instruction on how to approach the preference for experience with roster management and overtime equalization when screening applicants. The SMEs appeared to evaluate this preference differently.

25-HEM-0060

HEM conducted a desk audit of the hiring sequence for a Plumbing Consultant at the Illinois Department of Public Health (IDPH). While HEM did not make any formal recommendations, HEM reminded IDPH to ensure SMEs and screeners understand they should be updating the “Comments” section in applicant profiles in SuccessFactors to identify when they completed their review for each applicant.

Documentation of Interviews

25-HEM-0069

HEM conducted a desk audit of a hiring sequence for a Human Rights Trainer position at the Illinois Department of Human Rights (IDHR). While HEM found the final decisions to be merit-based and justifiable, HEM made two recommendations. HEM recommended that in the future, IDHR follow up with interviewers and screeners to discuss personal relationship disclosures further and document the follow-up and when it occurred in SuccessFactors. In this case, had an interviewer’s relationship with a candidate been vetted or questioned further, the interviewer may have been removed prior to interviews, rather than after the interviews had been completed, as happened here.

HEM also noted that there were several issues with the recording of scores by multiple interviewers and recommended additional training for those participating as interviewers to include the following concepts:

- reminders that interviewers need to ensure that adjusted scores are appropriately noted in the “adjusted score column” of the scoresheets;
- all interviewers need to note if there is a discussion and/or change due to interviewers scores being 10 points apart; and
- all interviewers need to provide a basis for their score change.

HEM also reminded IDHR to ensure SME reviewers understand they should be updating the “Comments” section upon completing their review.

HEM Advisory Updates

25-HEM-0033

Last quarter, HEM issued Advisory 25-HEM-0033 regarding the review of the hiring sequence for the Deputy Chief Fiscal Officer at the Illinois Department of Agriculture (AGR). HEM made several recommendations, including that agencies provide performance evaluations or otherwise document the performance of Exempt List employees while they are employed in the exempt position. HEM also reminded AGR to ensure it is using the correct position description when creating application questions going forward, especially when relying on previous requisitions. Additionally, HEM found five gaps in scoring that were more than 10 points apart, and the interviewers did not document that a discussion occurred. The interview completion times were also not recorded by the proctor for six candidates. HEM reminded AGR to review interview expectations with the interviewers prior to their participation.

AGR responded that Executive staff is aware that evaluations for Exempt List employees are not always done or done in a timely manner and that measures are being discussed on ways to improve the process and ensure evaluations or other documentation on performance is retained. AGR also stated that Human Resources has created a shared folder where Personnel Liaisons across program areas can access the most recent version of a position description. The Personnel Liaisons have also been trained on how to use the job card in SuccessFactors to ensure that any position description they are reviewing is the most recent version. Finally, AGR also agreed with the recommendation on interviewer training. AGR shared that they scheduled a meeting of proctors to review the new interview scoring tool and present a refresher on the role and responsibility of the proctor in the interview sequence.

25-HEM-0039

Last quarter, HEM issued Advisory 25-HEM-0039 regarding the hiring sequence for an Illinois Department of Agriculture (AGR) Division's Bureau Chief of Licensing and Administration. In the Advisory, HEM recommended that AGR ensure its staff's understanding of when resumes/CVs should be reviewed and what is required for all applicants and that the SME in the sequence receive additional screening training. In response, AGR stated that it would instruct all employees selected as a SME that "when resumes are included on a candidate's profile, they must be reviewed, along with their responses to application questions, as part of the review process. If a candidate has chosen not to attach a resume, the SME will only be required to review their responses to applicant questions."

AGR also stated that the SME from this sequence received additional training. HEM also recommended that AGR include notes summarizing all communications that support their Disclosure Form vetting decisions in the “additional comments” portion of the Disclosure Form. In response AGR stated that the “Bureau Chief of Human Resources will document all conversations via email and include those responses with the signed Relationship Disclosure Form.”

25-HEM-0037

In the second quarter 2025, HEM issued Advisory 25-HEM-0037 regarding an email from a legislator to an Illinois Department of Transportation (IDOT) legislative employee regarding an IDOT employee who had been placed on administrative leave. While the communication from the legislator met the CEP definition of a political contact, it was not reported to HEM or CMS Compliance by the legislative employee or by any of several IDOT employees to whom the communication was subsequently forwarded. While HEM’s review reflected that IDOT is generally reporting political contacts through the CMS portal in a timely manner, HEM’s conversations with multiple IDOT staff identified some confusion as to the political contact reporting process.

In the Advisory, HEM recommended that IDOT develop internal guidance to help staff identify what a political contact is and provide specific procedures for how – and by whom – such communications should be reported in accordance with the CEP. HEM also recommended that IDOT provide additional political contact training for administrative staff, as well as staff within the Legislative Affairs Division and the Bureau of Personnel Management. Lastly, HEM reviewed political contact reporting by other agencies and found that since CMS launched the portal in 2021, 12 agencies governed by the CEP had reported at least one political contact, while 25 agencies had not reported any. HEM followed up with the HR Directors at the 11 largest agencies that had never reported a political contact to ask about their internal political contact policies and learned that none of the agencies had written policies or procedures specifically pertaining to political contact reporting. Therefore, HEM further recommended that CMS and the Governor’s Office provide additional guidance and training on political contacts to all State agencies.

HEM requested a response to this Advisory, which was provided by the Governor’s Office, in collaboration with CMS and IDOT, on October 31, 2025. The response stated that the Governor’s Office had developed a Political Contacts Reporting Overview (Overview), shared with the response, and would be providing additional guidance during an upcoming training for agency legislative liaisons. The response further stated that CMS would: distribute the Overview to labor

and personnel employees and provide additional training for these employees during an upcoming labor and personnel meeting; disseminate the Overview to State employees who are most likely to interact with legislators; and instruct agencies to determine the best way to include information pertaining to political contact reporting in their employee handbooks or elsewhere. Lastly, the response stated that IDOT would update its Personnel Manual to include political contact guidance and provide relevant training to its legislative and personnel staff by the end of January 2026.

25-HEM-0048

Last quarter, HEM issued Advisory 25-HEM-0048 regarding the review of three IDHS Grant Programs Administrator hiring sequences. HEM found that CMS and IDHS differed in their interpretation of one of the minimum requirements. While CMS's narrow interpretation of the minimum qualification appeared to be consistently applied in the validation process, it did not seem to comport with IDHS's intent. As a result, HEM recommended that both agencies work together to determine an agreed upon interpretation.

CMS and IDHS provided a joint response that stated that after discussion CMS and IDHS agreed to change the current minimum qualification which read, "four (4) years of progressively responsible experience in the fields of health or human services." The agencies decided instead to use a modified version of the class specification for the Senior Public Service Administrator (SPSA) title, Option 6; the modified version requires "four years of progressively responsible **administrative** experience in a health or human services organization." (Emphasis added.) CMS also noted that it will work with its Hiring Leads to ensure consistency in applying the "administrative" component of the minimum qualification; without this language, CMS had previously interpreted the minimum qualification to require "direct" experience providing human services to the public or experience in supervising ones that provide those services, rather than a broader understanding that aligns more with IDHS's needs. HEM plans to review subsequent sequences to ensure this change and interpretation is implemented.

25-HEM-0058

Last quarter, HEM issued Advisory 25-HEM-0058 regarding a desk audit of a Payroll & Timekeeping Manager sequence at Illinois State Police. While HEM found the selection decision to be merit-based and justifiable, HEM recommended that ISP refrain from using preferred qualifications (PQs) and related application and interview questions that may provide an unfair advantage to State applicants overqualified non-State applicants. In addition, HEM noted several discrepancies regarding details of some candidate interviews. While ISP was able to explain

these discrepancies and, in most instances, provided documentation supporting its explanations, none of this documentation was uploaded to SuccessFactors. In addition, ISP did not upload the Disclosure Form for an employee who was originally assigned as the SME. HEM recommended that going forward, ISP ensure that the information in SuccessFactors is accurate and up to date, including by uploading relevant communications and all Disclosure Forms. HEM requested a response to this Advisory.

ISP provided an initial response on September 26, 2025, stating that going forward, the agency would upload or otherwise document all communications with applicants/candidates to explain any discrepancies in the hiring sequence paperwork and would ensure all Disclosure Forms completed during the hiring sequence are uploaded to SuccessFactors. Because this response did not address HEM's first recommendation regarding the PQs, HEM followed up with ISP's HR Director. On October 20, ISP provided a second response, in which it acknowledged that two of the PQs used in the Payroll & Timekeeping Manager sequence could have inadvertently favored internal candidates. ISP indicated it had modified the two PQs to address broader experience and recognize relevant, non-State experience. ISP said that going forward, it would review all PQs to ensure they are not overly narrow and update internal templates and guidance to emphasize relevant qualifications from both the public and private sectors.



V. HEM Exempt Reviews

Exempt List

In 2019, Federal court orders entered in the Shakman litigation led to the creation of the Exempt List, a comprehensive list of exempt positions for which hiring and employment decisions may be made on the basis of political considerations and in the case of hiring, without competitive selection; and an Exempt Employment Plan for filling positions on the Exempt List. The Exempt Employment Plan provides that candidates selected for exempt positions must meet the minimum qualifications and perform the duties of the exempt position being filled as set forth in the underlying position description.

The Exempt Employment Plan also sets forth procedures for adding or deleting positions to or from the Exempt List, providing that only the Governor or the Executive Inspector General (EIG) may initiate such a change. HEM reviews all Exempt List addition and deletion requests from the Governor's Office and recommends approval of or objection to the proposed change to the EIG, who must respond to the Governor's request within ten business days.

HEM Considerations When Reviewing Exempt List Requests

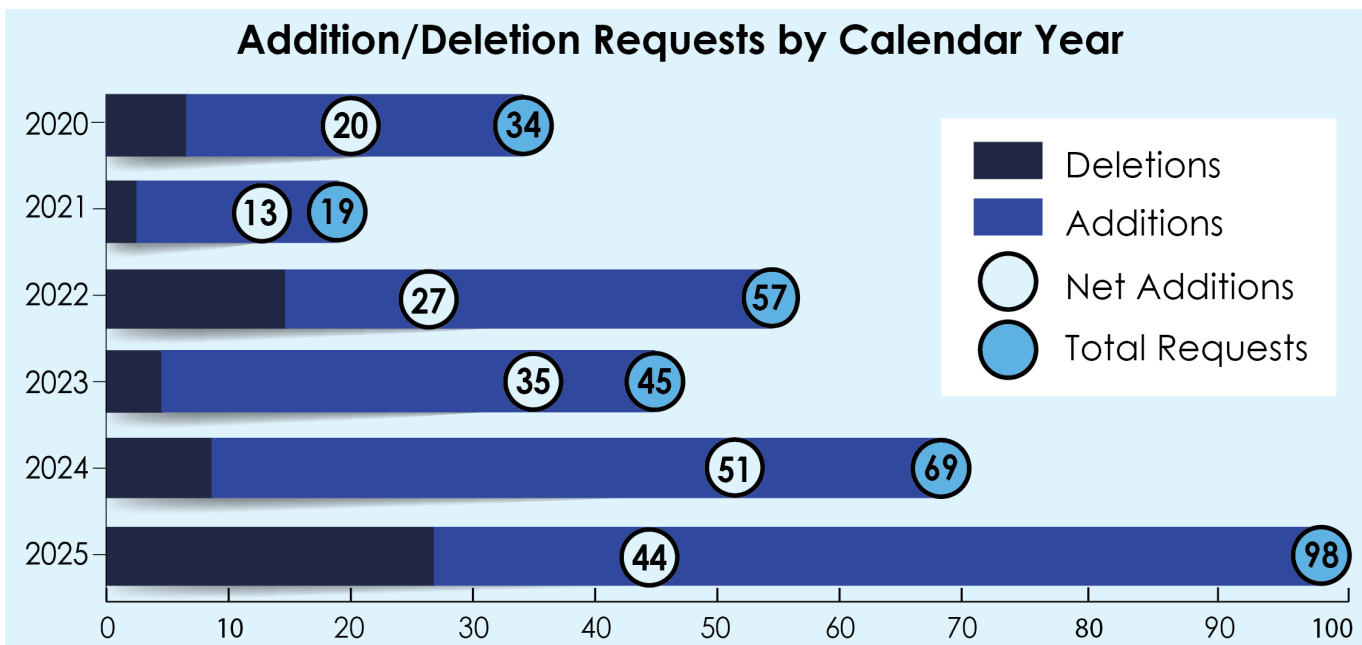
In order for the OEIG to agree that a position should be added to the Exempt List, the requesting entity needs to submit a position description that reflects independent policymaking or confidential work such that political affiliation is an appropriate consideration for effective performance. To ensure that the incumbent will be performing and reporting on the work set forth in the position description, HEM conducts a comprehensive review of all available information, and it works with the requesting agency, CMS, and the Governor's Office, to assess related factors, including:

- The support for the position, and whether it is required by or in keeping with the underlying legislative or executive initiative that prompted the request.
- Existing staff, both the percentage of exempt and non-exempt, that can complete the work, and whether this staff is employed full-time or on contract.
- Agency posting and hiring efforts for non-exempt staff.
- The reporting structure for the position, including both the supervisor and subordinate positions.

HEM assesses these factors to help ensure that the policy work of the proposed position can or will be meaningfully implemented, and to support the subsequent certifications from Agency Personnel Officers that the incumbents in Exempt List positions are performing the duties described in their position descriptions.

Requests to Add and Delete Exempt List Positions

In 2025, HEM reviewed a record-high number of exempt position requests – a total of 98 requests were reviewed and approved by HEM. Given the First Amendment implications of the Exempt List and the increase in requests to add positions to it, HEM focused on working with the Governor’s Office, CMS and the requesting agencies to ensure the requests were supported, including that other vacant positions were considered. Based on this work, 2025 also produced record-high exempt deletion requests: 27. This resulted in a significantly lower net total of additional exempt positions from the previous year, as reflected in the following chart:



The table below reflects HEM's approvals of Exempt List change requests by agency during the Fourth Quarter of 2025.

| Exempt List Additions and Deletions by Agency - Fourth Quarter 2025 | | |
|--|--|---------------------------|
| Agency/Entity | Working Title | OEIG Determination |
| Early Childhood | Legislative Liaison | Approved Addition |
| Early Childhood | Public Information Officer | Approved Addition |
| Guardianship and Advocacy Commission | Communications Director | Approved Addition |
| Healthcare and Family Services | Deputy Administrator for Policy | Approved Addition |
| Healthcare and Family Services | Deputy General Counsel of Policy Initiatives | Approved Addition |
| Healthcare and Family Services | Behavioral Health Policy Advisor | Approved Addition |
| Human Services | Federal Policy Response Senior Advisor | Approved Addition |
| Information & Technology | Chief Artificial Intelligence Officer (CAIO) | Approved Addition |
| Juvenile Justice | Chief of Trauma Informed Practice | Approved Addition |
| Labor | Legislative Liaison | Approved Addition |
| Natural Resources | Deputy Director of Operations | Approved Addition |
| Natural Resources | Deputy Director of Land and Planning | Approved Addition |
| Natural Resources | Office of Strategic Services | Approved Deletion |
| Public Health | Public Health Practice Deputy Director | Approved Addition |

In addition to modifications to the Exempt List, HEM staff reviews notification paperwork (also referred to as the exempt certification paperwork) for all exempt appointments to ensure compliance with the Exempt Employment Plan. This includes confirming that appointees meet the minimum requirements for the position. HEM also receives clarifications to exempt position descriptions from CMS. HEM's exempt reviews are described in the table below.

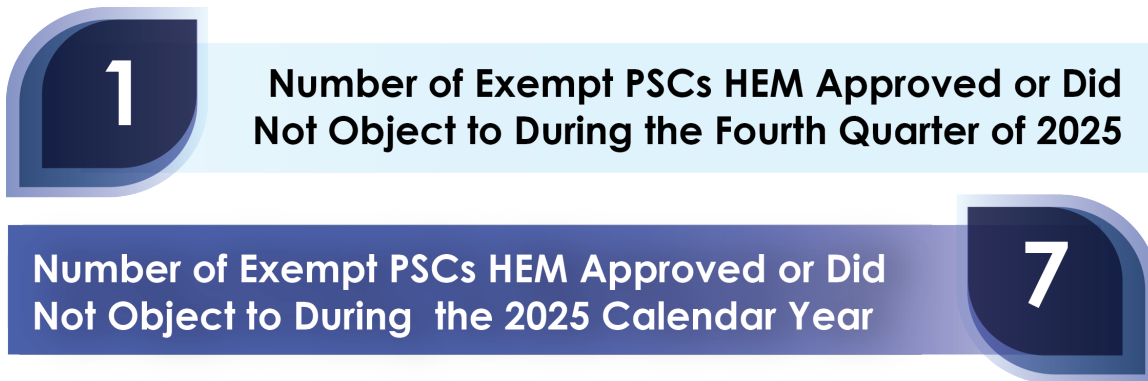
| Exempt Reviews Conducted | Fourth Quarter 2025 | Calendar Year 2025 |
|--|------------------------|-----------------------|
| Exempt appointment notifications/certifications received and reviewed for positions on the Exempt List | 121 (No objections) | 400 |
| Exempt position description clarifications received | 38 (No objections) | 59 |
| Exempt List addition requests received | 10 | 74 |
| Exempt List addition requests approved or not objected to | 13 | 71 |
| Agency withdrawal of Exempt List requests | 0 | 3 |
| Exempt List addition requests not approved | 0 | 6 |
| Exempt List deletion requests received | 0 | 27 |
| Exempt List deletion requests approved | 1 | 27 |
| Exempt List modification requests received | 0 | 18 |
| Exempt List modification requests approved | 0 | 18 |
| Exempt List pending requests | 1 | 1 |
| Exempt personal services contracts (PSCs) received for review | 1 | 8 |
| Exempt PSCs approved or not objected to | 1 | 7 |
| Exempt PSCs not approved | 0 | 1 |
| Agency withdrawal of exempt PSC request | 0 | 0 |
| Exempt PSCs pending | 0 | 0 |

Exempt Personal Services Contracts

Effective July 15, 2021, the amended CEP requires agencies that seek to hire an individual to perform duties that are consistent with exempt work through use of a Personal Services Contract (PSC) to submit the request in writing to the CMS Chief Compliance Officer and HEM. (See paragraph 68 of the amended CEP.) The request – which must be submitted prior to the individual starting work under the PSC – must include the rationale for the PSC, a copy of the proposed contract, and certification that the work to be performed is exempt work and the contractor is minimally qualified to perform that work.

HEM reviews this documentation, as well as any available information related to the basis for the request, the scope and exempt nature of the work, and the appropriateness of the minimum requirements. HEM often contacts the agency or CMS for additional background information or requests a meeting to discuss the request further. HEM must respond within five business days to the agency and the Governor's Office.

This quarter, HEM approved one exempt PSC: the Executive Director – Illinois Accountability Commission at the Illinois Department of Human Rights.





VI. Non-Exempt PSC Reporting

As stated in the CEP, agencies are required to report all PSCs, including renewals or amendments to such contracts, to CMS Compliance and HEM on a quarterly basis. HEM receives this information during the following quarter.

On December 3, 2025, within the fourth quarter, CMS Compliance provided the State's PSC Report for the third quarter of calendar year 2025. The following table summarizes this information:

| Data from the State's Personal Services Contract (PSC) Report for the Third Quarter of CY 2025 | Count |
|---|--------------|
| State entities that submitted a PSC report to CMS | 53 |
| State entities that decreased their use of PSCs from the previous quarter | 8 |
| State entities that increased their number of PSCs | 20 |
| State entities that did not have a change in PSCs | 25 |
| State entities that reported not utilizing any PSCs | 18 |

The following is a summary showing CMS' reports regarding PSCs reported in the first three quarters of 2025:¹

| Agency | # of PSCs Reported Q1 2025 | # of PSCs Reported Q2 2025 | # of PSCs Reported Q3 2025 |
|---|----------------------------|----------------------------|----------------------------|
| Abraham Lincoln Presidential Library and Museum | 1 | 0 | 0 |
| Aging | 8 | 9 | 8 |
| Agriculture | 36 | 62 | 43 |
| Arts Council | 0 | 0 | 0 |
| Capital Development Board | 2 | 2 | 3 |
| Central Management Services | 2 | 8 | 12 |
| Children and Family Services | 0 | 3 | 4 |
| Civil Service Commission | 0 | 0 | 0 |
| Commerce and Economic Opportunity | 12 | 16 | 30 |
| Commission on Equity and Inclusion | 0 | 0 | 0 |
| Corrections | 8 | 12 | 15 |
| Council on Developmental Disabilities | 0 | 0 | 0 |
| Criminal Justice Information Authority | 43 | 47 | 54 |
| Deaf and Hard of Hearing Commission | 1 | 1 | 1 |
| Early Childhood | N/A | 2 | 2 |
| Educational Labor Relations Board | 2 | 5 | 3 |
| Emergency Management Agency and Office of Homeland Security | 3 | 4 | 7 |
| Employment Security | 7 | 11 | 14 |
| Environmental Protection Agency | 0 | 0 | 0 |
| Financial and Professional Regulation | 33 | 66 | 38 |
| Gaming Board | 7 | 6 | 8 |
| Guardianship and Advocacy Commission | 0 | 0 | 0 |
| Healthcare and Family Services | 27 | 26 | 33 |
| Human Rights | 4 | 3 | 4 |
| Human Rights Commission | 0 | 0 | 0 |
| Human Services | 79 | 81 | 36 |
| Independent Tax Tribunal | 0 | 0 | 0 |
| Innovation and Technology | 10 | 21 | 33 |

¹ The report does not include PSCs used to pay for the support necessary to meet the accommodations for persons with disabilities. Individuals employed in this way are hired by the person in need of the accommodation without the State's involvement. Thus, the CEP does not apply to these types of contracts.

| Agency | # of PSCs Reported Q1 2025 | # of PSCs Reported Q2 2025 | # of PSCs Reported Q3 2025 |
|--|----------------------------|----------------------------|----------------------------|
| Insurance | 0 | 0 | 0 |
| Juvenile Justice | 15 | 11 | 12 |
| Labor | 0 | 0 | 1 |
| Labor Relations Board | 0 | 0 | 0 |
| Law Enforcement Training and Standards Board | Not Reported | 2 | 3 |
| Liquor Control Commission | 1 | 1 | 1 |
| Lottery | 0 | 0 | 0 |
| Military Affairs | 0 | 0 | 0 |
| Natural Resources | 155 | 130 | 152 |
| Pollution Control Board | 0 | 0 | 0 |
| Power Agency | 0 | 0 | 0 |
| Prisoner Review Board | 0 | 2 | 10 |
| Property Tax Appeal Board | 5 | 3 | 7 |
| Public Health | 11 | 15 | 15 |
| Racing Board | 2 | 4 | 3 |
| Revenue | 1 | 5 | 6 |
| Sentencing Policy Advisory Council | 0 | 0 | 0 |
| State Employees' Retirement System | 11 | 13 | 13 |
| State Fire Marshal | 0 | 2 | 2 |
| State Police | 1 | 0 | 0 |
| State Police Merit Board | 0 | 0 | 0 |
| Torture Inquiry and Relief Commission | 3 | 4 | 4 |
| Transportation | 5 | 7 | 9 |
| Veterans' Affairs | 9 | 11 | 7 |
| Worker's Compensation Commission | 2 | 3 | 2 |
| TOTAL PSCs Reported | 501 | 598 | 595 |

VII. Political Contact Reporting

State employees are required to report instances where an elected or appointed official of any political party or any agent acting on behalf of an elected or appointed official or political party attempts to affect any hiring or employment action for a Non-Exempt Position by contacting State personnel involved in an employment action whether in person, in writing, by telephone, by facsimile, by e-mail, or any other means. Pursuant to the CEP, any State employee who receives or has reason to believe such Political Contact has occurred, or is occurring, is required to report it to CMS or HEM within 48 hours of learning of such Political Contact. CMS is required by the CEP to maintain records documenting all reports of Political Contacts and Political Discrimination.

11

Number of Political Contact Reports HEM Received During the Fourth Quarter of 2025

Number of Political Contact Reports HEM Received During the 2025 Calendar Year

36

The Political Contact reports received this quarter are summarized below:²

Two reports involved separate applications that listed references to political figures and a third report involved a recommendation letter provided by a political figure – all three applications were part of applicants' job applications for Illinois Department of Human Services positions. In these three instances, CMS Compliance requested that the agency disregard the information.

The eight remaining reports were all filed by the Illinois Department of Transportation.

- One report was filed by the IDOT Legislative Liaison regarding an inquiry made by a State Representative's staffer about an employee who was

²Prior reports of Political Contacts made in 2025 are summarized in the previous quarterly reports.

terminated. CMS Compliance agreed with the Legislative Liaison's response which was to direct the staffer to IDOT's Personnel Office.

- Two reports were filed, one by the IDOT Director of Legislative Affairs and one by the IDOT Bureau Chief of Personnel Management, regarding a State Representative who inquired on behalf of a constituent who claimed IDOT had told him he was on a do not hire list based on a prior evaluation. The Director of Legislative Affairs directed the State Representative to IDOT Personnel and followed up with CMS Compliance to see if someone at CMS could speak with the Representative. CMS Compliance responded to share the CEP with the Representative. The IDOT Bureau Chief of Personnel Management separately reported to CMS Compliance, "IDOT cannot comment [on] an individual's personnel issue as it is confidential."
- One report was filed by the IDOT Director of Legislative Affairs regarding a State Representative's staffer's inquiry on behalf of a constituent who is a current employee and was denied a transfer request. CMS Compliance agreed with the IDOT Director's response which was to direct the staffer to IDOT's Personnel Office.
- Three reports were filed by the IDOT Director of Legislative Affairs regarding three separate instances in which a State Representative's staffer contacted him regarding a constituent's interest in a job. In all three instances, the IDOT Director responded to the staffer that he cannot weigh in on personnel issues. CMS Compliance agreed with the responses. According to the political contact report records, this was the fourth time that someone from the State Representative's offices reached out to an agency.
- One report was made by the IDOT Federal Affairs Bureau Chief who shared that he was sent an inquiry by a staffer for a U.S. Representative regarding a constituent's interest in IDOT employment. CMS Compliance agreed with the Bureau Chief's response which was to direct the staffer to IDOT's Personnel Office.



VIII. Investigative Division

The OEIG's Investigative Division receives approximately 3,000 complaints every fiscal year from members of the public, State employees, contractors, bidders, and anonymous sources. The OEIG evaluates all new complaints to determine the appropriate action, including opening an investigation, referring the allegations to the appropriate entity, or making a referral to HEM. In addition, the OEIG also has the authority to self-initiate an investigation based on information discovered in other investigations or available via public sources. Cases may also be transferred to the Investigative Division from HEM when a HEM review reveals evidence of intentional wrongdoing that requires a more in-depth inquiry, or evidence of unlawful political discrimination.

After an investigation, the OEIG issues (1) a summary report concluding reasonable cause exists to believe a violation has occurred (a "founded summary report"), or (2) a statement of the decision to close the investigation when there is insufficient evidence that a violation has occurred (an "unfounded summary report"). Founded summary reports document:

- the allegations of wrongdoing;
- facts confirmed by the investigation;
- an analysis of the facts in comparison to the applicable law, rule, or policy; and
- findings and recommendations.

In accordance with State law, the OEIG provides founded summary reports to the head of each agency affected by or involved with the investigation and the appropriate ultimate jurisdictional authority. The agency or ultimate jurisdictional authority is required to respond to the report and its recommendations within 20 days. Within 30 days after receiving the agency response, the OEIG must forward a copy of the founded summary report and the agency response to the Executive Ethics Commission (EEC).³ Pursuant to the Ethics Act, the EEC is the only entity permitted to determine the public release of OEIG founded summary reports.

³The exception is when the OEIG forwards a complaint to the Attorney General's Office to pursue an Ethics Act violation before the EEC.

Hiring-Related Complaints

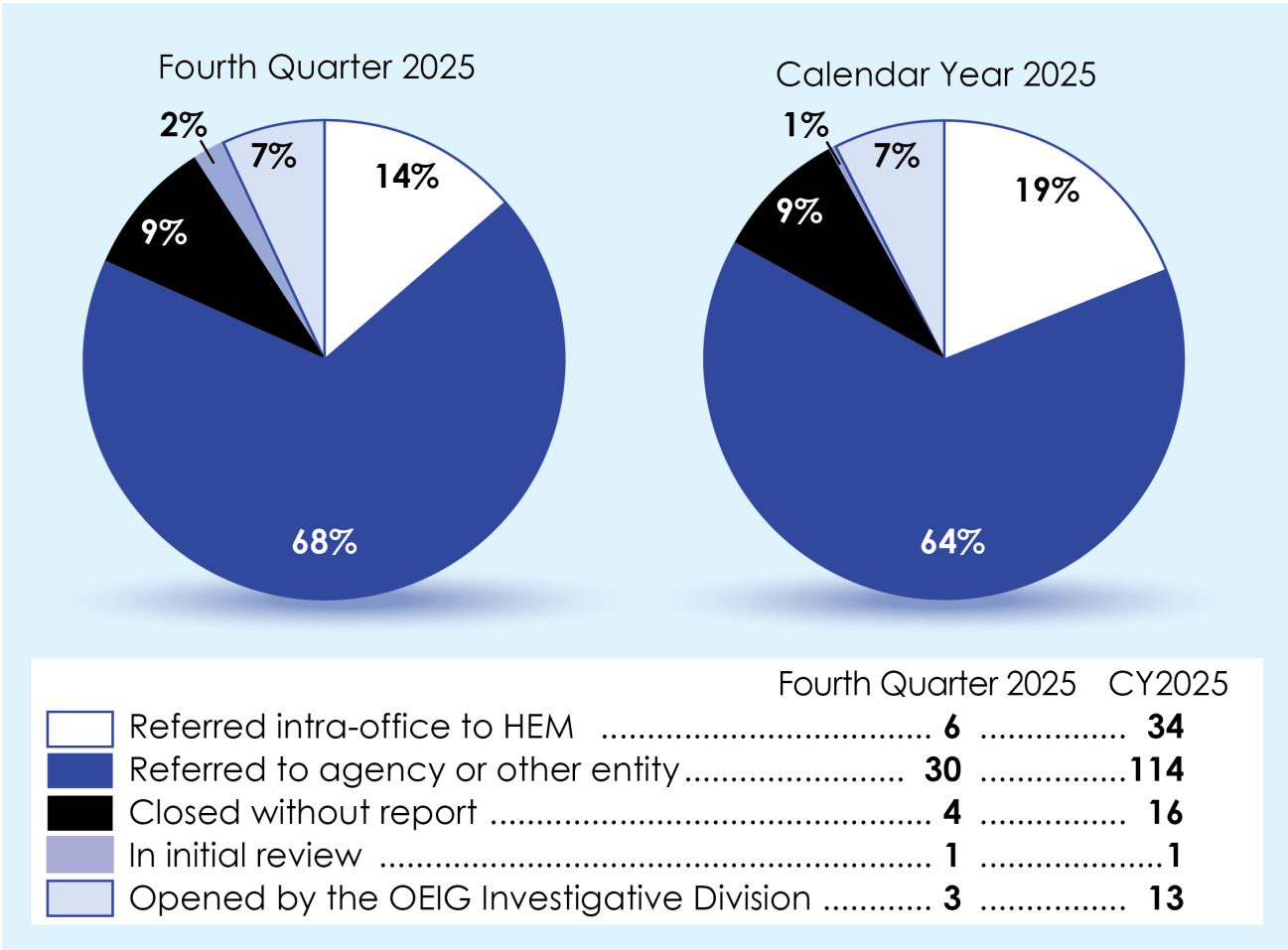
41

Number of Hiring-Related Complaints the OEIG Received During the Fourth Quarter of 2025

Number of Hiring-Related Complaints the OEIG Received During the 2025 Calendar Year

169

Actions Taken on Received Complaints



Hiring-Related Investigations

The following are the Investigative Division's numbers at the close of this quarter.

| Hiring-related Investigations | Fourth Quarter 2025 | Year-End 2025 |
|--|------------------------|------------------|
| Hiring-related investigations pending at the close of the quarter/year | 27 | 27 |
| Hiring-related investigations closed | 11 | 19 |
| Founded reports related to hiring issued | 1 | 2 |
| Founded reports related to hiring made available to the public | 1 | 2 |

This quarter, the EEC made one OEIG founded report related to hiring available to the public, which is summarized below. Previous publicly released reports are available at oeig.illinois.gov.

Case No. 19-00042

In 2019, the OEIG investigated and issued a founded report on the improper approval of a salary adjustment for an employee at the Illinois Department of Corrections (IDOC). The report was published this year following the Circuit Court's dismissal of the employee's case. In this case, the OEIG found that an IDOC employee defrauded IDOC by falsifying employment and income information in order to obtain an improper salary adjustment and approximately \$40,038 in back wages. The adjustment was made based on the employee's claims that she was entitled to an upward salary adjustment because her CMS-100 listed an approximately \$1,000 weekly salary that had been mistakenly calculated by the hiring unit as a monthly salary. The investigation further revealed that the employee's prior employment and income information was misrepresented on forms bearing her signature. In the total, the State suffered a loss of more than \$75,927, as a result of the misrepresentations. In response, IDOC terminated this employee.

The OEIG also found that the employee who effectuated the salary adjustment did not take reasonable steps to ensure that the salary adjustment was appropriate and properly supported. In response, this employee received an oral reprimand.



IX. Appendices

OEIG Leadership

Susan M. Haling, Executive Inspector General

Ms. Haling was first nominated as Executive Inspector General in March 2018, and was most recently reconfirmed by the Illinois Senate on April 11, 2024. She first joined the OEIG in December 2011 as Special Counsel and served as the First Assistant Inspector General beginning in 2015. In addition, she has more than nine years of experience as an Assistant U.S. Attorney in Chicago, where she tried over 20 criminal trials. Ms. Haling also previously worked for the U.S. Justice Department, Criminal Division, in Washington, D.C. Ms. Haling was a law clerk for the Honorable James F. Holderman, a former U.S. District Judge for the Northern District of Illinois. Ms. Haling received her BA from the University of Notre Dame and obtained her law degree from the DePaul University College of Law, where she graduated Order of the Coif, served as editor for the Law Review, and was a member of the Moot Court Trial Team.

Neil P. Olson, General Counsel

Mr. Olson returned to the OEIG in May 2018 and serves as General Counsel. Mr. Olson previously worked at the OEIG as Deputy Inspector General and Chief of Springfield Division before leaving the OEIG in 2013 to serve as General Counsel in the Office of the Illinois State Treasurer. Prior to his return to the OEIG, Mr. Olson also served as an Assistant Attorney General and then the Deputy Public Access Counselor in the Office of the Illinois Attorney General. He also previously worked for the Massachusetts Attorney General's Office, the Massachusetts Commission on Judicial Conduct, as a litigator in private practice, and as the law clerk to the Honorable Kenneth Laurence of the Massachusetts Appeals Court. Mr. Olson is a graduate of Grinnell College and Northeastern University School of Law and is licensed to practice law in Massachusetts and Illinois.

Fallon Opperman, Deputy Inspector General and Chief of Chicago Investigative Division

Ms. Opperman joined the OEIG as an Assistant Inspector General in June 2008 and then served as Chief of the Regional Transit Board Division. As Deputy Inspector General and Chief of Chicago Division since February 2015, Ms. Opperman manages the investigative activities of the OEIG's Chicago office, including oversight of the Regional Transit Board Division. Ms. Opperman received a BA from North Central College and obtained her law degree from the DePaul University College of Law.

Erin K. Bonales, Director of Hiring & Employment Monitoring

Ms. Bonales is responsible for directing the OEIG's Hiring & Employment Monitoring Division, which engages in compliance reviews and monitoring activities related to hiring and employment decisions, policies, and practices. Ms. Bonales previously worked for the OEIG for nearly eight years, including serving as Deputy Inspector General and Chief of the Chicago Investigative Division. Prior to joining the OEIG in May 2006, Ms. Bonales was an Assistant General Counsel for the Illinois Department of Human Services for approximately five years. Ms. Bonales received a JD from the University of Illinois College of Law, and a BA in Political Science from Southern Illinois University.

Christine P. Benavente, Deputy Inspector General - Executive Projects

Ms. Benavente joined the OEIG as an Assistant Inspector General in August 2011 and later served as a Legislative Assistant Inspector General. As Deputy Inspector General–Executive Projects, Ms. Benavente leads numerous executive projects, including overseeing the Division of External Compliance & Outreach, serving as the legislative attorney for all legislative matters pertaining to the OEIG, and serving as the Diversity, Equity, and Inclusion Coordinator. Prior to working at the OEIG, she was an Associate at Jenner & Block, LLP. Ms. Benavente obtained her law degree from DePaul University College of Law, where she graduated Order of the Coif and magna cum laude. During law school, she served as Editor-in-Chief of the Women's Law Caucus Digest and Moot Court Representative for the Hispanic National Bar Association. She obtained BAs from the University of Iowa.

Angela Luning, Deputy Inspector General and Chief of Springfield Investigative Division

Ms. Luning joined the OEIG as an Assistant Inspector General in 2012, became a Deputy Inspector General for Investigations in 2015, and currently also serves as Chief of the Springfield Division. Ms. Luning previously served as an Assistant State's Attorney in the Will County State's Attorney's Office, an Assistant Attorney General, and an Assistant Corporation Counsel for the City of Chicago; she also was a law clerk to the Hon. George W. Lindberg in the U.S. District Court for the Northern District of Illinois. Ms. Luning has a BA from Yale University, and received her law degree from Loyola University Chicago, where she served as the Executive Editor for Lead Articles on the Loyola University Chicago Law Journal.

Ogo Akpan, Chief Fiscal Officer and Operations Manager

Ms. Akpan joined the OEIG as Chief Fiscal Officer/Chicago Operations Manager in December 2021. She provides leadership and management of all financial operations of the agency and is also responsible for administrative operations of the Chicago office. Prior to the OEIG, she worked as a Certified Public Accountant for the Illinois Office of the Comptroller. She previously held finance leadership roles in the private sector responsible for accounting, finance, and data analytics functions. Ms. Akpan received her Bachelor of Science in Accounting from the University of Nigeria, obtained her MBA from Schulich School of Business, York University Toronto Canada, and is a Certified Public Accountant in the State of Illinois.

Percentage of Exempt Positions by Agency

| Agency | Agency Headcount ⁴ | % of Exempt Positions ⁵ |
|---|-------------------------------|------------------------------------|
| Abraham Lincoln Presidential Library and Museum | 93 | 15% |
| Aging | 170 | 10% |
| Agriculture | 539 | 3% |
| Arts Council | 20 | 20% |
| Capital Development Board | 157 | 14% |
| Central Management Services | 799 | 7% |
| Children & Family Services | 3961 | 2% |
| Commerce & Economic Opportunity | 412 | 12% |
| Commission on Equity and Inclusion | 29 | 31% |
| Corrections | 12151 | 1% |
| Council on Developmental Disabilities | 6 | 17% |
| Criminal Justice Information Authority | 126 | 13% |
| Deaf and Hard of Hearing Commission | 5 | 40% |
| Early Childhood ⁶ | 55 | 49% |
| Emergency Management Agency and Office of Homeland Security | 217 | 10% |
| Employment Security | 1148 | 3% |
| Environmental Protection Agency | 799 | 2% |
| Financial & Professional Regulation | 476 | 14% |
| Gaming Board | 219 | 8% |
| Guardianship & Advocacy Commission | 125 | 10% |
| Healthcare and Family Services | 1929 | 3% |
| Human Rights | 124 | 15% |
| Human Services | 15378 | 1% |
| Innovation & Technology | 1370 | 5% |
| Insurance | 288 | 11% |
| Juvenile Justice | 737 | 7% |
| Labor | 117 | 13% |
| Liquor Control Commission | 46 | 24% |
| Lottery | 156 | 6% |
| Military Affairs | 238 | 2% |

| Agency | Agency Headcount ⁴ | % of Exempt Positions ⁵ |
|---------------------------|-------------------------------|------------------------------------|
| Natural Resources | 1447 | 2% |
| Prisoner Review Board | 31 | 29% |
| Property Tax Appeal Board | 35 | 17% |
| Public Health | 1410 | 4% |
| Revenue | 1381 | 3% |
| State Fire Marshal | 180 | 5% |
| State Police | 2908 | 1% |
| Transportation | 5052 | 2% |
| Veterans' Affairs | 1305 | 2% |
| TOTAL | 55797 | 2.38% |

⁴The agency headcount was obtained from the FY2025 SERS Headcount Tracker Table (June 2025) provided in the FY2026 Budget Summary.

⁵The percentage was obtained using the number of exempt positions on the December 2, 2025 Exempt List and the agency headcount.

⁶The agency headcount was based on the FY2026 Target headcount in the Illinois State Budget Fiscal Year 2026 (Operating Budget).

Hiring-Related References

OEIG Hiring and Employment Monitoring Quarterly/Annual Reports
oeig.illinois.gov/hem/hem-reports

[The Governor's Comprehensive Employment Plan for Agencies Under the Jurisdiction of the Governor \(CEP\)](#)

[CMS Exempt List](#)

CMS Political Contact Reporting (For State Employees)
ilgov.sharepoint.com/sites/CMSPoliticalContactReporting

[Personnel Code](#)

OneNet Trainings
onenettraining.illinois.gov/onenettraining



Office of
Executive Inspector General
for the Agencies of the Illinois Governor



oeig.illinois.gov

Chicago Office:
69 W. Washington St., Suite 3400
Chicago, IL 60602
(312) 814-5600

Springfield Office:
607 E. Adams St., 14th
Floor Springfield, IL 62701
(217) 558-5600

Hotline: (866) 814-1113
TTY: (888) 261-2734