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## EMPLOYMENT PLAN OFFICE 16TH SEMI-ANNUAL REPORT

Dear Mr. Rocha and Inspector General Blanchard:

This is our office’s 16th Semi-Annual Report issued pursuant to Section IV.C.2 of the Cook County Health (CCH) Employment Plan (Plan). This report covers amendments made to Employment Plan, our training, monitoring, auditing, and investigative activities between January 1, 2022 and June 30, 2022, and goals and new initiatives for July 1, 2022 through December 31, 2022.<sup>1</sup>

### INTRODUCTION

CCH continues to have an unusually large number of vacancies due to turnover, a competitive job market, and the national workforce shortage. In this time, there was a large influx of contractors brought on to assist Human Resources (HR) with both recruitment and HR process optimization. For some of these contracts, the Employment Plan Office (EPO) provided guidance regarding Plan-compliant contract language and ensured that the full scope of services would also be compliant<sup>2</sup>. We collaborated with, provided guidance to, and/or monitored the performance of these contractors, depending on their roles and functions.

This office devoted a significant percentage of its time and resources during this reporting period to consulting on Plan-compliant options for quicker, high volume hiring and collaborating on the development of training content necessary to the successful implementation of the resulting exceptions to Employment Plan provisions that were approved both by the Office of the Independent Inspector-General (OIIG) and my office.

<sup>1</sup> In a few instances, I have addressed or introduced significant concerns with employment actions between July 1 and the writing of this report.

<sup>2</sup> For one contract, this involved developing a proposal for an exception to the Plan and assisting in the development of a Plan-compliant process once the exception was approved.

At the same time the HR team and the volume of hiring activity increased significantly and several process changes and other HR initiatives requiring EPO attention were in play, this office remained very short-staffed. We were unable to secure funding for a second analyst<sup>3</sup> in this budget year as we had hoped. We also lost our information coordinator and operated for a part of this period as a team of only two: me and one analyst. Under these circumstances, our ability to perform the following functions were significantly limited: (1) routine monitoring, auditing, and investigating; (2) providing direct guidance to employees as issues were identified; and (3) formally tracking our observations and follow-up.

### EMPLOYMENT PLAN AMENDMENTS

CCH leadership was interested in exploring Employment Plan-compliant mechanisms to quickly hire enough permanent staff to maintain operations. After they ruled out broad use of the Emergencies and Temporary Positions provision (VII.E)<sup>4</sup> early in the reporting period, we consulted with HR leadership regarding possible hiring process changes that would facilitate quicker and higher volume hiring while also complying with the Plan's fundamental principles.

In March, the Chief Human Resources Officer (CHRO) proposed a revised hiring process for use until 1,500 vacancies are filled. The Revised Hiring Process, essentially a streamlined combination of the General Hiring and Actively Recruited hiring processes, was approved by both our office and the OIIG for temporary use<sup>5</sup>. Once approved, we began working with HR and its optimization consultants on the development of the training and job aides necessary for successful implementation. The training content was substantially complete and ready for implementation by the end of the reporting period – but the rollout did not occur until July.

After a series of similar discussions about Plan-compliant options for streamlining the Hiring Fair Process, the CHRO also proposed a revised process. Like the Revised Hiring Process, the Revised Hiring Fair Process was approved by both by this office and the OIIG. Unlike the Revised Hiring Process, this process was implemented without rollout of a comprehensive training program. Over time, Plan-compliant amendments to the process were proposed and approved. As of the writing of this report, HR has not formally incorporated the most recently approved amendments into the documented process and there is no single source to review for all process requirements. We asked HR to rectify that to provide transparency and to ensure consistent interpretation and application<sup>6</sup>.

A third potential modification to the Plan also received significant EPO attention in the reporting period. Interviewing blitzes have been utilized by CCH for some time with the approval of the OIIG and the former EPO to streamline the interview process where there are multiple requisitions

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<sup>3</sup> We have been operating with only one analyst (responsible for both monitoring and investigations) since the spring of 2020.

<sup>4</sup> Under this provision, hires would be temporary and CCH would not be able to avoid utilizing approved hiring processes to permanently fill the vacancies. It was determined that this would create duplicative work for an already overtaxed HR department.

<sup>5</sup> An exception is not an Employment Plan amendment, so CCH will be required to formally amend the Plan to incorporate this process should it wish to continue using it once 1,500 employees have been hired.

<sup>6</sup> There were errors in a recent fair where HR appears to have been relying on a version of the process that had been modified.

for the same position. In a previous report, I addressed the fact that the process had been documented and was intended for inclusion in the Plan. During this reporting period, HR expressed a desire to build additional features into the process to better support quick and high volume hiring. Our office and HR engaged in many discussions about what a Plan-compliant process would look like, but a process has not been documented and a proposal has not been made as of the writing of this report.

A proposed modification to the process by which our office handles complaints alleging Plan violations was proposed and approved for inclusion in the Plan. The modification, which has yet to be added via formal amendment<sup>7</sup>, is addressed in more detail in the Investigations section below.

The following Plan exhibits were updated in compliance with the Plan as additional positions were approved for inclusion:

- Actively Recruited Position List (Exhibit 1): This list was revised three times during the reporting period. Twenty-three new positions were added.
- Direct Appointment Position List (Exhibit 5): This list was updated five times during the reporting period. Fifteen were approved to be added.

### TRAINING

Previous semi-annual reports have outlined the multiple training sessions that our office conducts in conjunction with HR: Employment Plan Training [overview for all staff]; Employment Plan Interviewer Training [for management and leadership]; Supplemental Policies & Procedures Training [for management and leadership]; and HR Training [for HR personnel].

The information below pertains to each type of training conducted:

- Employment Plan Training: This online training is required of all new staff *and* as an annual refresher for everyone else.
  - As previously reported, we transitioned to a new learning management system in the spring of 2021 and discovered that our training content was not technologically compatible with the new system. HR leadership expressed a desire for the incoming manager of operational development to have input before the updated deck was utilized<sup>8</sup>.
  - The new manager was onboarded in January and this training was prioritized. Though the content was substantially completed during the reporting period, it had not circulated as of the writing of this report. The content had to be updated to reflect the temporary Plan changes and the contractor responsible for technical aspects of finalizing the training separated abruptly.
    - Delay in circulating the training is a significant concern from our perspective as most new employees hired since the transition have had no introduction to the Employment Plan and their obligations and protections under it. Circulating this training must be a top priority.

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<sup>7</sup> It is our expectation that HR will formally amend the Plan to include the approved modification.

<sup>8</sup> Last fall, I developed content in a compatible format and submitted it to HR for review and finalization.

- Employment Plan Interviewer Training: CCH leaders are required to attend this four-hour, in-person training before participating in our hiring processes.
  - Though this training has traditionally been offered only once per month, we continued to offer additional sessions to accommodate increased demand as well as employees with urgent training needs. In total, there were ten sessions, and sixty employees were trained.

Online annual training is also required to maintain eligibility to participate in our hiring processes.

  - Like the all-employee training, the content was found to be incompatible with the new learning management system. It, too, was identified as a high-level priority for the new manager. Because of the previously referenced approved temporary changes to the Plan, we worked closely with HR leadership (including the new manager) and HR's optimization consultants to develop training to support implementation of the modified procedures.
    - Training content was substantially complete by the close of the applicable reporting period and rolled out in July.<sup>9</sup>
- Supplemental Policies and Procedures (Policies) Training: Training on the Supplemental Policies, like training on our hiring processes, is required of all new employees.
  - We offered a total of seven sessions of this two-hour, in-person training and trained a total of forty-nine employees. Like interviewer training, this is typically offered only one per month. Additional sessions were added to meet demand.
  - We continued to offer optional discipline policy refreshers.
- HR Staff Training: New HR staff are required to receive comprehensive training on the Plan and Policies. HR staff is also required to receive annual Plan and Policies training as well as training by HR on any updates to the Plan and/or Policies.
  - As of the writing of this report, I am unable to verify that all new HR staff and contractors are in full compliance with the training requirements<sup>10</sup>. Ensuring that all staff performing HR functions are properly trained is among my highest priorities. We will continue to assess compliance and will ensure that any not in full compliance are promptly trained.
  - Comprehensive annual training, which has been historically offered in-person, is significantly overdue. Due to the various challenges presenting since the pandemic, HR leadership determined that it was not operationally feasible to conduct this extensive training. This training remains high on our list of priorities given the number of staffing and process changes. As an alternative to lengthy sessions during this challenging time, HR recently agreed to a manageable process whereby the EPO will be invited to its staff

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<sup>9</sup> All existing and new leaders were required to attend training covering the Revised Hiring Process to be eligible to participate/continue participating in any of our hiring processes. This will be addressed more fully in our next report.

<sup>10</sup> There is a three-part training, and HR provides the training utilizing EPO-approved content: (1) introduction to the concept of Unlawful Political Discrimination, the Plan's underlying principles, and the responsibilities and protections it affords; (2) our hiring processes and the Plan's requirements; and (3) HR/recruitment process.

meetings to present on discrete topics. I anticipate that our office will be able to initiate this method of training by November<sup>11</sup>.

- HR's optimization consultants are creating an HR Playbook that documents standard operating procedures for the hiring processes. These procedures will be a welcome addition to supporting our HR team with Plan-compliant processing.

### **MONITORING**

When we monitor an employment action, we assist management by providing direction and guidance as processes unfold. This prevents non-compliance in real time and serves as a form of training to prevent future non-compliance. We also provide guidance when we observe practices that do not technically violate the Plan, but which do not fully conform with best practices. Our monitoring is not always conducted in real time, and in many instances takes the form of document review. Either way, our process is to recommend corrective measures either to hiring process participants and/or appropriate HR staff as issues are identified.

### **Hiring**

I have identified violations (and other concerns) throughout this section.

#### **General and Actively Recruited Positions**

We monitored or audited seventeen validation (application screening) processes, nineteen interview processes, three selection meetings, and forty-one Decision to Hire (DTH) packets. These numbers do not capture instances in which HR personnel reported issues and/or sought our guidance to prevent violations or instances in which we identified and addressed issues outside of formal monitoring<sup>12</sup>.

Notable observations made during monitoring include:

- *Validations:*

In several requisitions, there were language errors which led to the postings containing substantively inaccurate descriptions of minimum qualifications. In those cases, this office advised HR and the hiring department so the problems could be rectified.

- *Interviews:*

We observed the same types of issues noted in past semi-annual reports. The most common is when a panelist clarifies, explains or rephrases a question. We continued our practice in those instances of providing guidance to the panelists to prevent recurrence. We also continued our

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<sup>11</sup> Issues identified in this report will be among the first topics addressed.

<sup>12</sup> Despite the fact that we were without an information coordinator for more than half of the applicable reporting period, we identified several significant violations that were readily apparent upon review of materials submitted to our email account: (1) six instances of panels that included individuals ineligible to participate in our hiring processes, (2) two instances in which interviews were conducted without HR approval of the interview questions, (3) five instances in which interviews were conducted without HR approval of the interview list, (4) and four instances in which interviews were conducted without providing advance notice and an opportunity to monitor. In some cases, several of these infractions were found in a single hiring process. We worked through these issues with HR and HR oversaw remedial actions.

practice of providing real-time guidance on proper completion of Interview Evaluation Forms (IEFs).

Notable observations included the following:

- Interview panelists editorializing during the asking of interview questions;
- Interview panelists offering examples of answers to the question being posed;
- Failure to provide the EPO with the required 48-hour notice of interviews;
- Interview panelists challenging the presence of an EPO monitor;
- Interview panelists adding an additional interview question which was not approved by HR and required candidates to submit written material to the panelists at a later unspecified date.

● *Selection Meetings:*

We continued our practice of providing real-time feedback on completion of the paperwork that supports and/or is generated during the selection meeting. The most common issues we encounter include the order in which candidates are listed on the Interview Panel Ranking Form (IPRF) and failure to document the final ranking.

Notable observations include:

- An interview panel held a selection meeting prior to interviewing all candidates;
- Preceding a selection meeting, the hiring manager pre-filled the ranked candidate list according to raw score but prior to any discussion of the candidates;
- An interview panel and hiring manager attempted to include more than one candidate on a DTH form;
- An interview panel began a selection meeting-type discussion regarding the candidate immediately following the interview prior to concluding scoring for same.

● *Decision to Hire packets:*

The Decision to Hire (DTH) packet contains all the documentation produced by the interviewed candidates (Taleo application, resume, transcripts, licenses or certifications, NPCC Certifications, letters of recommendation) and everything generated by the interview panel and hiring manager in the hiring process. These packets are submitted to our email account for final review after the HR recruitment staff has reviewed the packets for accuracy and compliance with the Plan. In addition to providing guidance to the recruitment staff as questions arise during their review of the packets, we review these packets for compliance both on random and targeted bases. During this reporting period, we began review of forty-one such packets for compliance with the Employment Plan and current exception policy. Generally, we have thus far observed mostly minor, easily correctable administrative errors but our review of some Hiring Fair packets remains ongoing amidst concerns identified later in this report.

**Advanced Clinical Positions (ACP)**

This is the process utilized to hire physicians, psychologists, and advanced practice providers. We monitored seven ACP processes primarily via the DTH review process. We noted only minor administrative errors requiring correction.

## **Direct Appointments & Medical Staff Appointments & Executive Assistants**

- Direct Appointments

- *Process Overview*

The Direct Appointment Process (Section VIII) allows the Chief Executive Officer (CEO) broad discretion in appointing individuals to high level positions within the organization. Before a position is eligible for hiring under this process, the job description is presented to the OIIG for approval. To be eligible for approval, the job itself must meet specific criteria in terms of educational and experience requirements, as well a chain of command requirement. These positions must also be at-will. Positions approved for this process are maintained on Exhibit 5 to the Plan.

Though the CEO has broad discretion to fill these positions and a competitive process is not required, the hires must meet all minimum qualifications and may not be selected based upon political reasons or factors. Once a candidate has been identified for hire, HR validates the candidate to ensure he/she meets all minimum qualification and verifies that none of the circumstances that would require disqualification (e.g., appearance on the Ineligible for Hire List) are present. If the candidate is eligible for hire, the next step is for HR to send notice of the selected candidate with all required documents (job description, application, resume, NPCC, etc.) to our office and the OIIG. This collection of documents is referred to as the Request to Hire (RTH) packet. After a 3-day window of opportunity for review and absent any objections, the Chief of HR proceeds with completing the hiring process.

- *RTH Packets*

This reporting period, three RTH packets were formally circulated prior to onboarding the selectees as required and we did not identify any substantive concerns in the documents.

Two RTH packets circulated in this reporting period, which I had previously addressed in the EPO 15<sup>th</sup> Semi-Annual Report, were for hires appointed in the prior reporting period (last year), thereby failing to provide the OIIG and our office the opportunity to raise objections before the individuals were hired. We addressed the concern with HR at that time and anticipated that there would be no further such violations. Unfortunately, that was not the case in the applicable reporting period. We learned of the hire of five additional onboarded Direct Appointment hires only through our review of orientation lists or through announcements made at meetings and before packets had been circulated. Four of the packets have yet to be circulated as of the writing of this report.

The trend of continuing the hiring process without first circulating RTH packets continued into July, which falls into our next reporting period. I mention the trend here because it is something that needs to be addressed and remedied immediately.

- *Job Description Update*

We also identified a matter of concern regarding a Direct Appointment job description that HR had modified in May after obtaining required approval from the OIIG. The concern stems from the fact that we later learned that the request for modification, which eliminated one of the minimum qualifications of the position, was motivated by the desire to consider applicants presented to CCH that did not meet the original minimum qualifications rather than because it was

determined that the qualification was not truly required<sup>13</sup>. One the past mechanisms of alleged Unlawful Political Discrimination was the modification of job descriptions to match the qualifications of pre-selected, politically connected candidates. We are not suggesting that there was a political motivation in requesting the modification in the present case but wanted to express our concern with the process that unfolded once the hiring manager concluded her wish to hire from a small pool of candidates whom she acknowledged did not meet all minimum qualifications. Allowing job description changes to meet the qualifications of existing applicants would open a loophole for potential abuse that the Plan intended to close<sup>14</sup>. We became aware that the selectee for the position was among those in the existing pool of candidates that did not possess the minimum qualification that had been eliminated. We expressed our concern with this process and objected to hiring the candidate under the circumstances.

- Medical Staff Appointments

A similar process is used when the CEO and the CCH Board of Directors appoint someone to a department, division, or section chair of the medical departments of the medical staff (Plan Section VII.B). We received no packets in this reporting period.

- Executive Assistants

Two executive assistants were appointed during the applicable period. Our observations are as follows:

- In one instance, we learned via a public announcement that the CHRO had appointed an Executive Assistant hire. Section X.F of the Plan states, “[u]pon completion of the verification and testing described in Section X.E.3, DHR will take steps to complete the hiring process and send written notice (including all required documents) to the EPO and OIIG.” We requested that the required paperwork be circulated and received the paperwork more than a month after the employee was onboarded. We found nothing in the packet of concern.
- The packet for the second executive assistant was circulated the day she was onboarded. We noted several concerns with the official packet that was circulated but recall seeing additional materials prior to the candidate’s hire that were not included in the packet and that may address those concerns. We raised the issue with HR and will provide an update in the next semi-annual report.

### **Emergency & Temporary Hires**

In May, HR submitted a certification to the OIIG pursuant to the Emergencies and Temporary Positions provision (VII.E) regarding emergent circumstances supporting the need to hire four employees to continue the COVID-19 vaccination effort. This process allows CCH to hire employees on an emergency basis for up to one hundred twenty days in a calendar year without complying with the General Hiring Process. These employees are not eligible to be transferred or otherwise moved into permanent positions at the conclusion of the emergency period.

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<sup>13</sup> This motivation for the update was not shared with the OIIG.

<sup>14</sup> Section IV.H of the Plan, which addresses the review of job descriptions states, “DHR may not consider the particular qualifications of an anticipated Applicant or Candidate when modifying a Job Description.”



## Hiring Fairs

### ○ *Historical Context*

The Hiring Fair provision was added to the Plan in February 2020 but was not utilized until July 2021 when HR and leadership made the decision to implement the process due to the critical staff shortage described in the introductory paragraph. The Hiring Fair Process was included in the Plan as the pandemic was emerging and priorities were shifting. Understandably, there were no immediate plans to utilize a process that would involve large gatherings, and developing the training and infrastructure (e.g., standard operating procedures, checklists, tracking mechanisms and forms) was not identified as a priority. Unfortunately, the decision to start scheduling fairs to address critical staff shortages was made at a time when HR staff and the EPO were stretched thin and without adequate time to develop the training and ancillary procedures critical to provide the requisite transparency and to facilitate compliant implementation of this very complex process. Because of how closely together the early fairs were held, the necessary training and ancillary procedures had yet to be developed. In the absence of these important safeguards, as well as other observable internal and external challenges, significant missteps and errors occurred.

The first fair in this reporting period, which took place in January, had to be converted to a virtual process (via Teams) in short order due to an uptick in COVID-19 diagnoses at the time and required the development of a process for overflow interviews that could not be completed on the day of the fair<sup>15</sup>. This office and the OIIG also approved a modified selection process that required substantial hours from the EPO to support compliant implementation. Though we did not identify anything of significant concern in the interviews we observed, we learned of a significant posting violation after-the-fact<sup>16</sup>.

At the time that this January fair was being completed, I had already started drafting the EPO 15<sup>th</sup> Semi-Annual Report. Though my office did not have the resources to fully audit the fairs that were held and planned between the first fair in July 2021 and the end of the reporting period in December 2021, we had identified several process gaps and violations, as well as an emerging trend for HR and the hiring departments to seek *ad hoc* modifications to customize the process for each fair. In that report, I expressed my belief that these fair-specific adjustments (such as the selection process for the January fair), though not direct transgressions of the Plan, set a bad precedent. By that point, my office held significant concerns that the established processes would become the exception and newly developed unvetted processes would be implemented without adequate transparency. I recommended discontinued use of the Hiring Fair Process until the Plan could be amended to reflect a process that would meet CCH's needs (and be implemented systemwide without exception), ancillary procedures could be developed, and the training necessary to support successful implementation could be developed.

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<sup>15</sup> There was a higher volume of registrants than anticipated and the assigned panels could not complete all interviews by the time set for the conclusion of the fair.

<sup>16</sup> We learned that the positions had been posted for the fair without first completing the internal/CBA processes as required by the Plan and that the ranking process had to be corrected. This was particularly concerning because this issue had not been reported to our office when it happened but rather came up as an aside in a later meeting on an unrelated topic. HR employees, like any other employees of CCH, have a duty to report violations of Plan, Supplemental Policies or the Personnel Rules to our office.

- *Process Updates*

We did not have the opportunity to look backward and conduct a full audit of the January fair because efforts to review and amend the Hiring Fair Process had already begun. Our office was actively engaged with HR to consult on modifications that would satisfy the Plan's fundamental principles. A temporary Revised Hiring Fair Process was proposed and approved by our office and the OIIG in March.

- *Hiring Fair Observations*

Though I had formally recommended against any further hiring fairs until the Hiring Fair Process could be solidified and a comprehensive training implemented, by April, there was a push to conduct another fair for nurses given a critical staffing shortage. We were assured that training content would be completed in time to prepare CCH staff for the fair with the support of HR's optimization consultants. The fair was planned, but comprehensive training was not completed in time.

- *April Fair*

To support a compliant process in the absence of a comprehensive training program, partial training was provided. CCH fair participants (interview panelists, HR support, hiring department administrative support, etc.) were required to attend a walkthrough and tutorial on what to do *on the day of the hiring fair*. This walkthrough, though beneficial, did not satisfy the training requirement as the most significant issues identified in the previous fairs arose or resulted from errors or missteps made prior to the date of the fairs (e.g., job posting violations, deficiencies with applicant/potential applicant communications).

Though turnout at the April fair was small<sup>17</sup>, we did observe non-compliance with new Revised Hiring Fair Process. For at least one of the requisitions, the hiring department, with HR's approval, failed to make any attempt to include an interview question specifically tailored to validate one of the minimum qualifications. The need to validate experience minimum qualifications via the interview questions was new and necessitated by the fact that the Revised Hiring Fair Process does not include a process by which the hiring department and/or HR reviews the application materials to verify the applicant possesses all required qualifications for a position before they are interviewed.

Even for the requisitions for which minimum qualifications questions were addressed, they lacked requisite specificity and did not include boilerplate language traditionally included on the Interview Evaluation Form to advise the panel of which question(s) were validating a minimum qualification. In one instance, a candidate applied for a position that required two years of experience. Though the candidate only demonstrated one and a half years of experience (and one panelist identified the issue on her evaluation), the other panelist nevertheless recommended her for hire. The hiring manager completed a Deviation Form seeking HR's permission to hire the candidate despite failing to meet the minimum experience requirement. Fortunately, HR recognized the deficiency, and the candidate was not hired into that role.

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<sup>17</sup> Twenty-nine attendees; CCH extended six contingent external offers.

Also worth noting is the fact that the process detailed in the Revised Hiring Fair Process for HR to notify our office before moving beyond contingent offers (to allow our office the opportunity to review the files) was not followed.

- *Recent Trends*

We believe it necessary to touch on hiring fair related activity that transpired in July and August given the uptick in non-compliance that was identified.

It was determined this summer that there was a critical need to fill a minimum of four hundred vacancies before September 1<sup>st</sup>, and my office and the OIIG approved additional proposed amendments to the Revised Hiring Fair Process to support that goal. Most notably, we agreed to a reduction of the notice requirement for each fair from thirty days down to seven and a reduction of the posting period from fourteen days to seven. Reducing the notice period significantly without full training for HR and the hiring departments created concerns for my office since previous fairs planned with a guaranteed thirty-day planning window had not been fully compliant.

The Plan requires that the CHRO and EPO approve a fair in writing but does not speak to a process or criteria. I had previously communicated the need to formalize a process for obtaining EPO approval since there are many factors that go into whether a requested fair is appropriate. I determined that our approval would be conditioned upon proof that HR and the hiring department had planned a Plan-compliant fair. This became even more critical with the reduced notice and posting periods as comprehensive Hiring Fair Process training had yet to be implemented and a fair could now be held only one week after receiving the requisite approvals.

We worked closely with HR and its optimization consultants to develop a request, planning and approval process, as well as the corresponding forms. Finalization of a comprehensive fair plan at a planning meeting attended by all leaders and project managers in both HR and the hiring department was at the heart of the process that was agreed upon. Our expectation was that HR would work with the hiring departments and provide the guidance necessary to plan compliant fairs<sup>18</sup>.

Once the request/planning/approval process was finalized, my office prepared a PowerPoint presentation to introduce department heads interested in requesting fairs to the steps necessary to obtain approval.

Leadership determined that six fairs would be held before September 1<sup>st</sup> to satisfy critical need, and all six were scheduled to take place in late August. The request/planning/approval process did not go as planned. Though there were a couple of instances in which all or at least most of the required parties gathered, they never got very far in the planning process and the fairs were planned via ongoing side meetings (that were not attended by all required participants) and via voluminous email communications. Under the circumstances, we were unable to follow the processes and I did not provide advance written approval for any of the fairs. I was assured that compliant fairs had

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<sup>18</sup> This guidance is particularly important considering the hiring departments have not received hiring fair training.

been planned, but we identified several concerns<sup>19</sup> and violations that would have been prevented had the planning meetings been conducted as the procedure was designed.

The most notable concerns were with the HR's posting of the positions (inaccurate and otherwise non-compliant) and approval of interview questions that did not validate the experience minimum qualifications as required. There was also one instance we became aware of in which HR gave a panel authorization on the day of a fair to reduce the questions from nine to four (below the minimum required - 5) after candidates had already been interviewed (violating the requirement that all candidates answer the same pre-approved questions).

Though we did not have the resources to fully monitor each fair or to audit the entirety of the documents, we did perform an initial review of the documents generated in the fair held on August 19th. In that review, we identified several concerns which parallel those identified elsewhere in this report. Some of what we found demonstrated violation of a specific Plan requirement (e.g., insufficient interview questions or failure to post a requisition for the minimum allowable time -- which had already been reduced significantly), where other issues related to possible gaps in the audit trail (insufficient transparency)<sup>20</sup>. In monitoring one of the fairs, we also learned of a long-standing HR procedure that we believe violates the Plan<sup>21</sup>.

#### ▪ *The Future*

Our recommendation remains the same as it was when I issued the EPO 15<sup>th</sup> Semi-Annual Report. The Hiring Fair Process should be discontinued until ancillary procedures are solidified and comprehensive training is finalized and implemented<sup>22</sup>.

Based upon what we were able to observe from the most recent hiring fairs, there was a considerable amount of non-compliance with the new process. We met with HR's leaders and project managers after the August fairs to discuss the issues we identified. HR acknowledged that mistakes were made and that training is needed, but that does not go far enough. HR is responsible for compliant implementation of the Plan and must take the initiative to review the documentation, identify non-compliance (including any gaps in documentation), and take the initiative to not only correct violations from the past fairs but to also make procedural adjustments necessary to prevent recurrence in future fairs.

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<sup>19</sup> For one of the fairs, there were urgent emails circulating after the fair had started to verify the eligibility of one of the assigned panelists.

<sup>20</sup> For example, where an earlier requisition has leftover PIDs after the internal/CBA process and has been approved for re-posting for a fair, there must be documentation to match that requisition to the hiring fair requisition if the same requisition number is not used.

<sup>21</sup> HR has been disqualifying applicants based upon low interview scores received in connection with applications for other postings for the same job title within the preceding year. This basis for disqualification is not addressed/authorized in the Plan. We raised this concern with HR.

<sup>22</sup> Training content and job aides finalized following this fair have not been presented or circulated to staff due to HR's desire to release it together with training on the hiring blitz process. As of the writing of this report, the hiring blitz process has not been agreed upon internally or proposed for inclusion in the Plan.

## Miscellaneous

The Plan requires my office to review all letters of recommendation (LORs) and forward any containing a Political Contact to the OIIG with a Political Contact Log. Hiring departments are trained to forward LORs to us upon receipt (as opposed to after the hiring process) so that a determination may be made as to whether the recommendation is a Political Contact that must be reported to the OIIG. Only valid recommendations may be considered by a panel. Only three LORs were submitted to my office in the reporting period, and they were all for the same candidate. They were not submitted by a politically-related person or organization.

In a recent report in which I reported I had not received any LORs, I addressed the possibility that LORs were being submitted to hiring departments but not forwarded to our office as required. I expressed a desire to incorporate additional measures to support compliance with this requirement. This was accomplished via inclusion on the checklist provided to all who attend Revised Hiring Process training<sup>23</sup>.

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## Supplemental Policies

### Reclassification of Positions (#02.01.11) and Desk Audits (#02.01.19)

In our last semi-annual report, we did not have any reclassifications to report. In that report, we addressed the following bulleted points. I have provided the updated status of each:

- I recommended two desk audits in a June 2021 Incident Report that had not been completed.
  - The desk audits have not been completed as of the writing of this report. HR acknowledged the recommendation and advised us that a staffing shortage in HR was responsible for the delay.
  - One of the recommended desk audits became moot when the employee applied and was hired into the role believed to match her current duties.
- We noted at that time that one reclassification had been approved but had not been implemented for budgetary reasons.
  - That budgetary constraint was subsequently resolved, and the reclassification was implemented.
- Two reclassification requests we had identified in the EPO 14<sup>th</sup> Semi-Annual Report had been withdrawn as incomplete and were not re-submitted by December 31, 2021.
  - We received no notices of reclassification in this reporting period. I followed up recently to verify that there had been no reclassifications and learned that the two previously withdrawn reclassifications had been approved. We requested packets for review and will include our analysis in the next semi-annual report.

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### Transfers (#02.01.12)

One transfer was reported. We reviewed the notice form and did not identify anything of concern.

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<sup>23</sup> Revised Hiring Process training has been incorporated into Interviewer training for new employees such that existing and new employees trained to participate in our hiring processes will receive this checklist.

### **Training Opportunities (02.01.13) & Overtime (02.01.14)**

The Employment Plan Office submits electronic NPCCs for completion by the Department Heads twice per year specific to their implementation of the Training Opportunities and Overtime policies over the prior six-month period. The most recent NPCCs were due on June 15, 2022. As of July 11, following a series of reminders, ninety-four were not started or incomplete. As of September 2, and after another series of email reminders, that number was reduced to twenty-eight. We will continue our follow-up efforts to achieve full compliance.

### **Interim Assignment (#02.01.16) and Interim Pay (#02.03.01)**

HR submitted roughly fifty approvals for Interim Assignments (including extensions) and corresponding Interim Pay. Included among these were approvals for classifications of employees and circumstances admittedly not covered by the policies.<sup>24</sup>

We were not able to review every packet, but the same types of issues identified in prior reports were present. As stated in prior reports, a significant concern is that the policies and the related form(s) need to provide for consistent application and full transparency. Satisfaction of all requirements and criteria must be verifiable in the four corners of the packets presented.

I have highlighted a few points below:

- The Interim Assignment Policy does not define Interim Assignment but describes an employee fully assuming the duties of a vacant position and includes a process to evaluate whether the proposed employee meets the minimum qualifications of the that position. The Interim Pay Policy, on the other hand, refers to employees assigned to perform all or part (50% or more) of the duties of a higher-level position [higher pay grade or broader responsibility] as performing Interim Assignments.
  - The Interim Assignment/Interim Pay Request and Authorization Form requires the department head to certify that the employee proposed for the assignment meets all minimum qualifications in the job description but pay is being authorized even under circumstances where the individual has not fully assumed another role and may not meet all minimum qualifications of the vacant role.
  - Under circumstances where the budgeted and Interim Assignment Positions are the same pay grade, there is no place for the department head to verify that the duties of the Interim Assignment Position require broader responsibility<sup>25</sup>.
- The Interim Assignment Policy requires justification for why an Interim Assignment is needed.

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<sup>24</sup> More than a year ago, HR leadership began developing a policy (and corresponding form) to address the criteria and process for requesting and approval special earnings not addressed by the Interim Pay Policy, but it has yet to be completed. HR utilizes the Interim Assignment/Pay form because there is currently no better alternative to document and report special earnings issued outside of the policy. Finalization/updates to these policies must be prioritized as there must be clear authority, process and mechanisms of transparency for interim assignments and all forms of special earnings.

<sup>25</sup> In one case, an assignee is receiving interim pay to continue the duties of her former position after receiving a promotion.

- There is no space on the form to justify why an Interim Assignment is needed. It is not enough that the position is vacant; documentation of the reason for the vacancy is a separate requirement. This information is included in the documentation very infrequently.
- The Interim Pay Policy requires that the Department Head to submit a request to the applicable System Senior Leader and obtain approval in writing. These approvals must also be submitted to HR prior to the effective date of the Interim Assignment for an employee to be eligible for Interim Pay.
  - These requests and System Senior Leader<sup>26</sup> approvals are not included with or verified by the materials submitted to our office.
- The Interim Pay Policy contains an eligibility requirement that the duties must be performed by the employee for a minimum of one month before being eligible for Interim Pay.
  - There is no place on the form to document when the duties began.
- Neither policy nor the form require the department to provide justification specific to the need to extend an Interim Assignment.
  - Interim Assignments and are more prevalent since the start of the pandemic and in the face of the Great Resignation, as are the lengths of the assignment<sup>27</sup>. For the sake of transparency, we believe that the policy should be updated to require documented justifications for extensions (e.g., position posted but not yet filled).
- The form does not provide a means to verify that an individual is filling a *budgeted* vacancy. The policy requires justification for why an Interim Assignment is necessary (e.g., why someone needs to perform the duties while the position remains vacant). It stands to reason that an Interim Assignment should not be approved where a position is not prioritized highly enough to be included in the budget/there is no plan to fill the position<sup>28</sup>.

Updates to these policies and the form have been among HR's highest priorities for some time now, and I expect that the updates will be addressed before year's end. I will provide status in the next report.

### **Layoff/Recall (#02.01.17)**

There were several layoffs this reporting period related to the conclusion of the COVID-19 contact tracing grant.

- We reviewed the documents and confirmed that the process was governed entirely by the CBA to which the employees were parties (and, in many cases, allowed them to remain at CCH in other available union positions).

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<sup>26</sup> System Senior Leader is not defined but is generally understood to be the highest executive leader over the respective department.

<sup>27</sup> In the applicable reporting period, we noted some Interim Assignments from the beginning of 2021 were still being extended.

<sup>28</sup> We identified an Interim Assignment that exceeded a year that fulfills an unbudgeted role and another year-plus assignment for a position for which there appears to have been no attempt to permanently fill the vacancy.

No recalls were reported. It has been more than one year since an updated Layoff List has been circulated to the OIIG and EPO as required.

### **Demotion (#02.01.20)**

There were no demotions reported during the reporting period.

### **Grade 24 Positions: Classification (#02.01.21) and Salary Adjustments (#02.01.22)**

Human Resources is required to perform a market study to determine the salary for Grade 24 positions when they are new, vacant, or subject to a request for an adjustment. The CHRO approves all salary determinations and submits determinations and approvals to our office and the OIIG with DTH packets.

- We reviewed the Grade 24 determinations provided with the Direct Appointment RTH packets and did not note anything of concern.

As noted in past reports, I recommended clarification of certain language in the policy. HR agreed, but the update has yet to be made. It is among several policies under review.

### **Discipline (02.01.15)**

According to HR, there were two hundred ninety corrective actions in the reporting period, with one hundred eighty-three being formal discipline, and over one hundred fell below the level of suspension. Out of the formal disciplines, one hundred thirty-six contained a citation to the Time & Attendance Policy and/or the Personnel Rule infraction connected to repeated tardiness<sup>29</sup>.

We reviewed one hundred corrective actions and noted a combined total of nearly seventy violations or notable administrative concerns with the documentation. The most common issues identified included failure to attach required documents, failure to obtain necessary signatures (approvals) or failure to obtain them in the timeframe or order required, late submission of required documents, supervisor failure to verify that an assessment had been conducted prior to issuing discipline, and supervisor citation to outdated and/or irrelevant corrective action history on the forms.

Consistent with past practice, we met routinely with an employee from HR to discuss violations and other concerns identified and she followed up with the issuing supervisors as necessary to provide guidance and/or require corrections. We were unable to provide as much direct guidance (or formal notice of non-compliance) to applicable leaders when issues were identified as in the past. However, we were able to continue offering optional refresher training.

We also discovered when reconciling termination numbers with HR, that departments are still making the mistake of not sending the packets to the email account that we have access to and/or failing to submit the separation documentation to HR's operations team for processing. HR is aware of the issue and is addressing it.

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<sup>29</sup> We were pleased to learn that the HRBP team is currently working with the Manager of Workforce Development to provide guidance on application of the Time & Attendance Policy. The policy addresses how to approach discipline for infractions and questions regarding the application of those rules are frequent in discipline training sessions.



## AUDITS

### **Third-Party Providers**

Due to the large influx of contractors brought in to assist HR with sourcing and recruitment, many of which are subject to the Third-Party Providers Policy, we initiated an audit to review the contracts and other policy-related documentation<sup>30</sup> as well as to verify that all contractors have received necessary training for the functions they are performing. The results will be covered in the next report.

### **Hiring Fair**

We intend to fully audit at least one of the August hiring fairs to evaluate compliance and to ensure that there are no gaps in procedure or documentation<sup>31</sup>. We will include those results in the next report.

## INELIGIBLE FOR HIRE LIST

HR and the EPO met three times during this period to review terminations and resignations/retirements made in lieu of termination to evaluate whether inclusion on the Ineligible for Hire List is pursuant to Plan Section IV.P is warranted. Fifteen individuals who separated in the applicable period were added.

When an individual is added to the list, HR provides notice to those added to the list. Individuals (except those who are exempt from Career Service) may appeal the decision in writing to the CHRO within thirty days of the date the notice was sent. Unless the CHRO reverses the determination, the individual remains on the list for a period of five years. The CHRO received four appeals during this reporting period. Though none of the appeals were granted, one individual was removed from the list upon reinstatement. A total of twenty individuals were removed in the applicable period as their time on the list expired.

My office, pursuant to an agreement with HR, has continued to execute CCH duties regarding the list by maintaining records, editing the list and circulating updates to the OIIG, BHR, and the recruitment team and will do so until this task is returned to HR. Given the hire of a new employee into the HR role that previously performed this function, I expect that transition to occur imminently.

## INVESTIGATIONS

During the preceding reporting period, we received eight new complaints one of which has already been closed. We closed five additional complaints from earlier reporting periods without sustained findings and expect to issue several additional investigative reports shortly. Difficulties associated with EPO understaffing precluded progress on several outstanding investigations as has been reported previously. However, the EPO recently hired a new Program Manager, Andrew Jester, who comes to us after serving over ten years in the Cook County Office of the Independent Inspector General where he focused on both compliance matters and investigations related to the Employment Plans of the various County entities. Following his arrival, the EPO proposed a series of modifications to the Employment Plan which will better enable the EPO to triage and administratively resolve, often by referral, complaints which do not address the underpinnings of the Employment Plan and

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<sup>30</sup> In conjunction with this process, we requested NPCCs executed by each current Third-Party Provider as permitted by the policy. We collaborated with HR on the development of a form specific to contractors and it was circulated to all covered contractors.

<sup>31</sup> If any gaps are identified, we will convene the necessary parties to improve the process for the future.

Supplemental Policies<sup>32</sup>. We expect that the addition of Mr. Jester and this new EPO investigative triage process will substantially resolve our backlog of investigations in the coming months.

The following references regard new complaints received and the related allegations:

- EPO2022-1: Improper procedures at a CCH Hiring Fair. *Pending*.
- EPO2022-2: Hire of individual who failed to meet minimum qualifications. *Pending*.
- EPO2022-3: Conduct of ARP Panel absent required notice to Human Resources. *Closed*.
- EPO2022-4: Time theft by CCH contractor. *Pending*.
- EPO2022-5: Inquiry regarding cancelled posting. *Pending*.
- EPO2022-6: Failure to follow disciplinary procedure regarding clinical staff. *Pending*.
- EPO2022-7: Verbal and administrative mistreatment by manager. *Pending*.
- EPO2022-8: Improper contact with applicant outside of interview or HR process. *Pending*.

#### CCH WEBSITE

The Plan specifies certain content and information that our website must contain. In the EPO 15<sup>th</sup> Semi-Annual Report, I identified the following bulleted concerns:

- Various employee names and/or mailing addresses on the face of the Human Resources page or in the documents accessed via its links were incorrect/outdated.
  - Those issues were corrected immediately.
- The Quarterly Report for Q4 of 2021 had not been uploaded.
  - As of the writing of this report, neither the Q4 of 2021 report nor any reports for 2022 have been uploaded.
- The website does not contain all the job descriptions required, and the ones it does contain do not appear to be the most current versions.
  - As of the writing of this report, the job descriptions on the website are outdated and incomplete. The failure to provide access to the job descriptions is not only an impediment to transparency generally but has also lends to challenges and vulnerabilities in the hiring process<sup>33</sup>. HR recently reassured us that this is a priority and will be addressed shortly.

I also noted in our last report that the narrative content on the Human Resources page relative to the Employment Plan requires update and reorganization, that the website did not contain an Employment

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<sup>32</sup> These modifications were approved but, as of the writing of this report, CCH has yet to formally amend the Plan to include them.

<sup>33</sup> It was recently brought to our attention how the inability to directly access current, approved job descriptions has impacted the hiring process. Hiring departments have attached outdated job descriptions to the form that starts the hiring process. If that is not caught by HR, our requisitions will be posted with outdated requirements. We also learned departments, on occasion, have attached job descriptions with unapproved proposed updates to Requests to Hire. This also creates the opportunity for posting errors. The need for a central repository of final, approved job descriptions and the need for a defined process for proposing updates became apparent. Before that issue was brought to our attention, guidance on how and when to make proposed changes to job descriptions for a position to be posted had been incorporated into the Revised Hiring Process training that was set to roll out systemwide.

Plan Office page, and that there was no reference or link to Employment Plan information on the Careers page (accessed by individuals interested in applying for positions). I expressed my intention to work with HR and our IT team to ensure that updates and corrections were made on a priority basis.

- Those updates have not been made to-date, but it is our understanding that one of HR's optimization teams has been tasked with improving the Careers page on the website. Our hope is that this will involve creating an Employment Plan page and providing a link to it. Website improvements remains on our list of priorities as our website is one of the main mechanisms to provide transparency.

### NEW & UPCOMING

#### **Employment Plan, Supplemental Policy and Training Updates**

Plan, Policy and training needs and statuses are addressed above.

#### **Website**

Website update needs and initiatives are addressed above.

#### **Technology**

In past semi-annual reports, I have addressed our desire for key components of the hiring processes to be automated.

- While the initial internal effort to automate the interview and selection processes was abandoned, HR's optimization consults have made progress toward automating another part of hiring. As of the writing of this report, they are in the process of rolling out an automated Decision to Hire Form that will also be used to collect uploads of other hiring process documents.
  - Our hope is that all hiring processes and a method for providing required notices<sup>34</sup> will be automated.
  - The CHRO was very receptive to my inquiry about the possibility of automating the discipline process. It involves multiple steps, multiple participants, and the movement of drafts of forms and related documents to various participants throughout the process. Notice and document maintenance requirements are also factors. Automation would provide transparency and support efficient and compliant implementation and oversight. It is my understanding that our optimization consultants and HRIS have been assigned this task but that, due to competing priorities, have been unable to initiate. I will provide an update in the next semi-annual report.

#### **HR Updates**

Aside from the information previously provided regarding optimization and recruitment efforts, HR created the Human Resources Business Partner (HRBP) role and filled three of the four vacancies.

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<sup>34</sup> The Plan requires departments to send advance notice of interviews and other types of employment actions to both our office and the OIG. These notices result in a large volume of email and require review, analysis (timeliness of notice, eligibility of panelists, etc.) and processing on our end. For something as simple as notice, a shared calendaring system that requires input of all relevant data would be very much appreciated.

The new HRBPs work closely with leaders and staff of their assigned business areas provide guidance on various HR-related concerns, including interpretation of HR practices, policies, and procedures<sup>35</sup>. We have already seen their impact from supporting Plan and Policy compliance.

## **EPO Updates**

We have done our best to keep up with investigations and routine monitoring, but it has been extremely challenging in an organization of this size with only one analyst and without an information coordinator considering the current mechanisms for accessing data, the volume of data received, and the need to actively engage on evolving processes (and related training needs). That said, I am confident that our position will improve in the coming months.

- We hired a program manager at the end of May who is focusing as much time as possible on our investigations and eliminating the backlog of pending complaints. Additionally, the newly approved Plan modification allows for much more efficient processing.
- We onboarded a contracted administrative assistant in August who will temporarily assist us with administrative needs.
- We hired an information coordinator who started September 12<sup>th</sup>. Her initial focus will be on assisting with our department's planned overhaul of the ways we access, monitor/audit and track data.
  - We developed a multi-step plan to identify shared sources of data (currently available or that will become available as a result of HR optimization initiatives) and redesign our internal procedures and tools for maintaining and tracking data that address recent changes to our hiring processes and prioritizes efficient processing. The Business Intelligence Department has graciously agreed to serve as a resource in this effort, and we would gladly welcome any guidance or support that HR's optimization consultants may be able to provide.
- I requested funding for two additional analysts in the FY2023 budget.

## **CONCLUSION**

CCH, like other employers during the Great Resignation, has faced challenges with maintaining staff and filling vacancies at the rate necessary to maintain operations. To combat these challenges, leadership contracted with various agencies to supplement its recruitment team. By the end of August, the recruitment team, supplemented by contractors, had grown to at least twenty. As of the writing of this report, another HR contract including both optimization and recruitment services was kicking off, growing the recruitment team even further.

We worked closely with HR and a modified hiring process was approved in the spring to streamline the hiring for our General Hiring and Actively Recruited positions. The Hiring Fair Process was also modified to facilitate quick, volume hiring.

In the face of a large influx of new HR resources and new hiring processes, the need for clearly defined procedures, comprehensive training, and increased oversight was critical. Unfortunately, processes

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<sup>35</sup> This includes the Employment Plan and Supplemental Policies.

continued to evolve, some procedures remained unclear, necessary training was not provided, and oversight was limited<sup>36</sup>. Even with our reduced capability to monitor and audit, a consistent and broad array of non-compliance was identified. From our observation, this resulted from the facts that processes were constantly evolving and not always communicated, training needs were not met, and senior HR leadership was too stretched to provide the enlarged team of staff and contractors with the high-level decision-making, guidance and oversight that was needed to properly develop and implement new processes and procedures in a complex environment at such a fast pace. Added to all of this is the fact that compressed hiring fair timelines did not provide adequate opportunity to identify and address issues or course correct along the way.

The Plan includes mechanisms for emergencies and allows for process modifications such that compliance is attainable even in difficult circumstances. After leadership decided against using the process for emergencies to temporarily fill the vacancies pending completion of the applicable hiring processes for permanent hires, we worked tirelessly with HR to develop streamlined but Plan-compliant processes and the training content necessary to support successful implementation. The foundation is there. With proper training and oversight, and with both HR and hiring department leaderships' commitment to encourage, oversee, and support compliance<sup>37</sup>, the types of violations we have identified are easily preventable.

We recently began an initiative to interview and/or shadow key HR employees to better understand HR's procedures for implementing the Plan's hiring process requirements. This will allow us to identify where existing procedures may need to be adjusted or new procedures may need to be created to facilitate and oversee compliant hiring processes. It will also allow us to assess where additional training or support may be needed as we begin to develop and update training content for HR<sup>38</sup>.

I will report on HR, hiring department and EPO efforts and progress toward improving Plan compliance in the next report.

Sincerely,



Kimberly Craft  
EMPLOYMENT PLAN OFFICER

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<sup>36</sup> Senior HR leadership was stretched, and my office's ability to monitor hiring processes was limited by several factors including short staffing and multiple competing priorities. While our monitoring numbers have been somewhat reduced since the significant reduction in staff experienced in early 2020 and beyond, our overall percentage of hiring actions monitored has reduced significantly in recent months given the increased volume of hiring activity.

<sup>37</sup> HR must hold hiring departments accountable for adhering to the Plan and hiring department leaders must support this by holding their employees accountable.

<sup>38</sup> We are also using these meetings as an opportunity to identify sources of HR data and the opportunity to share resources as we work on re-designing our own internal procedures for maintaining documents and tracking data.

cc: CCH Board of Directors *via* Deborah Santana, Secretary of the Board, CCH  
Jeffrey McCutchan, General Counsel, CCH  
Valarie Amos, Chief Human Resources Officer, CCH  
Carrie Pramuk-Volk, Associate Chief Human Resources Officer, CCH  
Steven Cyranoski, Office of the Independent Inspector General  
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