

# COOK COUNTY HEALTH & HOSPITALS SYSTEM



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& HOSPITALS SYSTEM  
**CCHHS**

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March 16, 2015

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Mr. Patrick M. Blanchard  
Independent Inspector General  
69 W. Washington  
Suite 1160  
Chicago, Illinois 60602

Ms. Mary T. Robinson  
Compliance Administrator  
69 W. Washington, Suite 840  
Chicago, Illinois 60602

## Semi-Annual Report March 2015

Dear Dr. Shannon, Inspector General Blanchard and Ms. Robinson:

This is the first semi-annual report issued pursuant to Section IV.\_ of the Employment Plan (Plan) filed on October 23, 2014. This report will unfortunately be brief, as the Cook County Health & Hospitals System (CCHHS) is still in transition as we implement the Plan fully. Therefore, this report will be a status on the implementation to date, as well as the status of any investigations on going with my office since inception of the Plan.

### EMPLOYMENT PLAN TRAINING

Although the Plan was filed on October 23, 2015, due to the timing of holidays and vacations, it was not possible to fully implement the Plan in 2014. Although some provisions such as providing appropriate notice of interviews, randomizations, selection meetings, and decisions to hire were in full effect, many other provisions of the Plan required extensive training of the Human Resource Department (HR) as well as managers and other non-union employees who would comprise interview panels before implementation could move forward. To that end, I have been engaged in significant training efforts since October of 2014.

Overall, training on the Plan will roll out in three phases. Phase 1 was extensive training of HR. All employees of HR (55 employees as of February 2015) have been trained on their role in implementing the Plan; they also received the Interview Training. The recruitment and labor teams within HR received detailed training, because their understanding and involvement in implementation of the Plan is critical to its success. During each session, I was assisted by the Office of the Independent Inspector General (OIIG) whose investigators provided the legal compliance portion of the training. Additional sessions for new HR staff will be scheduled soon.

Phase 2 of the training started at the end of January and is currently ongoing. This training is meant for the managers, supervisors and interviewers who will engage in following the hiring processes outlined in the Plan, and it is done in conjunction with the OIIG as well. These sessions not only cover compliance with the Plan, the Shakman Consent Decrees and County ordinances related to the prohibition of unlawful political discrimination, but also extensive training on the hiring processes as outlined in the Plan. 344 employees have been trained on this process in 16 sessions held to date. There are another four Interviewer Training sessions scheduled, and five tentatively scheduled, through early April. In addition, I am working with leadership to identify how many additional managers, supervisors or interviewers need to receive training before HR is able to roll out the new forms and processes.

Phase 3 of Employment Plan Training will roll out toward the end of April and is geared toward all CCHHS employees. This session will cover the duty to report political discrimination, political contacts, non-compliance with the Plan, as well as generally cover the hiring processes so that all employees understand how to comply with the Plan, the Shakman Consent Decrees and County Ordinances related to the prohibition of unlawful political discrimination. These training sessions will be carried out by me and two members of my staff in hopes of completing training for all current employees this summer. Currently, there are approximately 5,600 employees that will go through Phase 3 of Employment Plan Training.

Overall, Phase 2 training has been well received by management and interviewers. Although not a perfect process, many in management are supportive of the goals of this Plan as well as appreciative of the flexibility permitted in the Actively Recruited Process. After each session, several attendees provide positive feedback as to the training, the efforts made in creating the Plan to combat unwanted influence in employment decision making, and the more interactive nature of the process with HR. My last two sessions even elicited applause.

#### EMPLOYMENT PLAN IMPLEMENTATION

Before the Plan can be fully implemented, training needs to be completed with a substantial number of the supervisors and interviewers as they will be using the new forms and processes. However, just prior to filing the Plan, I began training over 100 physicians on the Actively Recruited Process so that new physician requisitions could utilize that process and the new forms. This transition took place at the end of October, 2014, and has been in use ever since. Although a few mistakes have been made along the way, whenever I or HR spoke to the Hiring Manager about concerns or a forgotten step, it was quickly rectified. The Hiring Managers and panels are reaching out for assistance and advice from both me and HR on the process and forms so as to stay in compliance with the Plan.

February 9, 2015 marked the date when HR began implementing several other provisions of the Plan of which it had control. For instance, providing notice of interviews, randomizations, and completed validations to me and the Compliance Administrator, as well as documenting all changes that occur during the process. Additional provisions of the Plan will be implemented over the next few months as

new procedures are created in line with the Plan. CCHHS has a specific timeline for implementation that has been established for a practical roll out of the Plan, which will be refined once training is complete.

The implementation timeline was created in December of 2014 with the assistance of the Compliance Administrator and her staff. To date, we are essentially on track with that plan, which required that HR and Supervisors/Interviewers receive training on the Plan by the beginning of April 2015. This initial phase of implementation also required that the Plan and information relating to the Plan find a home on the CCHHS website. According to HR, that requirement will be realized soon; the site is currently in the testing phase.

#### INVESTIGATIONS

Several complaints about violations of CCHHS hiring practices have been filed with my office over the last 1.5 years. Many of these complaints are still under investigation as my focus has been on preparing and conducting trainings since last August. However, with the addition of two employees to my staff to assist in training, monitoring and investigating, I anticipate my next report will incorporate the nature of these complaints along with any recommendations that have been made. A few incident reports were presented to the OIIG and CEO of CCHHS as investigations were completed. In each of these cases, either no violations were found, or minor violations occurred which were remedied with additional training sessions between me and the interviewers or Hiring Managers at issue. Training was the recommended course of action because of the lack of approved Plan and considerable differences in training that had been provided to the interviewing panelists since 2012.

However, twelve complaints have been filed since the Plan was filed in October. Each of these complaints is still under investigation, and one of those complaints has been forwarded to the OIIG for further review as it alleged retaliation for having filed a Pre-SRO claim with the Compliance Administrator in 2007. I will report on the status or results of each of these investigations in my next report.

#### RESPONSE TO INVESTIGATIONS

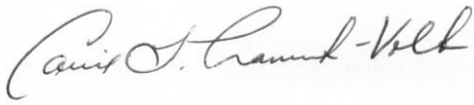
Due to the lack of incident reports completed since the filing of the Plan, there are no CEO responses to discuss. However, in general, management and CCHHS employees have been cooperative during the investigation process. Supervisors have made employees available for interview; witnesses have been accommodating and presenting for interview; and HR has been helpful by providing requested documentation in a timely manner.

#### SUMMARY

Since my start date in June of 2013, I have been monitoring and auditing the hiring processes at CCHHS with the goal of learning what was or was not working, and where the training would need to be focused once the Plan was in place. Those efforts were not wasted; HR was able to use much of this information and the interactions we had over that time period to craft the Plan we have today. And with the help of HR, I was able to prepare the current training sessions to address those repetitive errors or inconsistencies that I or others had personally observed.

The next report will issue after the Plan has been in effect for several months. That report will be able to provide a more robust assessment of Plan implementation, areas of focus, and my current investigations under the Plan.

Sincerely,

A handwritten signature in cursive script, reading "Carrie L. Pramuk-Volk". The signature is written in black ink on a light-colored background.

Carrie L. Pramuk-Volk

cc: Ms. Elizabeth Reidy, General Counsel  
Ms. Gladys Lopez, Chief of Human Resources